



American Contract Excavation

Safety Program

Prepared by:
American Contract Excavation
in association with:
U.S. Compliance Systems, Inc.

Disclaimer: This Safety Program has been prepared exclusively for:

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To the best of our knowledge, the information contained herein is accurate. U.S. Compliance Systems, Inc. accepts no responsibility for errors or omissions.

American Contract Excavation

POLICY STATEMENT

We have developed a comprehensive safety program that addresses our specific safety concerns and provides guidance for the performance of our individual job tasks within the framework of appropriate Occupational Safety & Health Administration (OSHA) standards.

Safety takes a commitment from all personnel within our organization. Training will be interactive with an opportunity for all to actively participate, ask questions, make suggestions, and refer to our written policies and procedures.

It is our policy to provide a work environment that is inherently safe. The safety and health of our employees is of primary importance as they are our most important resource.

Safety training needs will be identified by continual reassessment of our work methods, equipment and job sites as well as employee and management input. Observation of unsafe acts will be addressed immediately.

Each employee is encouraged to contact their Supervisor immediately should a safety or health risk exist so that corrective action may be taken immediately.

Safety requires not only that each person understand and perform individual tasks in a safe manner, but also that each individual is aware of his surroundings and is actively involved in the safety of others.

This Policy Statement will be conspicuously posted.

Nathan Wade
Safety Director

American Contract Excavation

Safety Program Overview

This comprehensive safety & health training program has been developed to address our specific safety concerns and to provide guidance for the performance of individual job tasks within the framework of appropriate Occupational Safety & Health Administration (OSHA) standards.

Safety demands a commitment from all personnel within our organization. As a contractor, we have an obligation to ensure that all our employees are afforded the protection of an appropriate safety & health program.

This program contains policies and procedures to deal with common workplace hazards, specific job related hazards, and potential hazards that may arise.

Hazard assessment, project pre-planning, and engineering controls, where feasible, will be the preferred method of providing a safe workplace. Hazards that remain will be minimized or eliminated through training which provides our employees the ability to recognize workplace hazards and understand the proper procedural and/or personal protective equipment requirements.

Each employee is encouraged to contact their supervisor immediately should a safety or health risk exist so that corrective action may be taken to eliminate the hazard entirely or deal with the hazard in a safe manner through modified work procedures, PPE, and/or other appropriate action.

On all job sites, at least one person will be designated a “**competent person**” by virtue of experience or training. This person will have the ability to identify work related hazards, know the corrective procedures, and have the responsibility, ability and authority to stop work if the workplace cannot be made safe.

The Safety Director or a designated competent person will make routine and random job site inspections to both identify new hazards and to monitor the effectiveness of our safety & health program.

In the final analysis, the success of our safety effort depends on all employees from senior management to the newest hire demonstrating a commitment to safety by working in a safe manner. Safe job performance is how our safety effort is ultimately measured.

For ease of use, this safety program has been divided into four broad categories. These are:

SECTION I

General safety policies and procedures.

SECTION II

Job Specific - Equipment Specific Safety Procedures.

SECTION III

Specific compliance programs with appropriate forms.

SECTION IV

Project Manual with Job Site Forms.

This manual highlights important concepts and is designed to be kept on individual job sites with the job site forms.

Additionally, there is one appendix:

APPENDIX A

Training documentation.

SECTION I

GENERAL SAFETY POLICIES AND PROCEDURES

American Contract Excavation

SAFETY PROGRAM

SECTION I

GENERAL SAFETY POLICIES AND PROCEDURES

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Standards:

- 29 CFR 1926.16, *Rules of Construction*
- 29 CFR 1926.20, *General Safety and Health Provisions*
- 29 CFR 1926.21, *Safety Training and Education*
- 29 CFR 1926.34, *Means of Egress*
- 29 CFR 1926.35, *Employee Emergency Action Plans*
- PART 1904, *Recording and Reporting Occupational Injuries and Illnesses*

GENERAL SAFETY POLICIES AND PROCEDURES

ACCIDENT/INJURY PREVENTION

Our safety program is designed so that our employees do not work in conditions that are unsanitary, hazardous, or dangerous to their health or safety.

One lax moment in terms of safety may result in a lifetime of needless pain and suffering. Disregarding safety standards may even be fatal. While an accident may happen in an instant, the consequences may last for years.

Accident prevention requires a commitment from all personnel within our company to actively participate in our safety program. All personnel should be aware of job site hazards and follow procedures to eliminate these hazards by proper work methods, use of personal protective equipment, and proper use of tools and equipment. All persons are encouraged to ask questions and make positive suggestions for safety improvement.

Competent persons will be designated to provide job site expertise as well as regular inspections of equipment, materials, and procedures. Competent persons will have the authority to stop work if a safety hazard is identified and it cannot be corrected immediately.

All machinery, tools, materials and equipment deemed unsafe will be taken out of service by physically removing, tagging, or locking controls to render them inoperable.

Only persons qualified by training or experience will be allowed to operate equipment or machinery.

All tools and items of equipment will be used for the purpose for which they were designed. For example, a wrench is not a hammer; a ladder is not a horizontal plank; a fire extinguisher is not a cooler!

Never take chances or attempt any job without being aware of the proper procedures, the potential safety hazards, and the methods to reduce or eliminate risk.

SAFETY PROGRAM ADMINISTRATOR

Our Safety Director will administer this safety program and has overall responsibility for the implementation of this program. The safety director will ensure each employee has appropriate safety training for the tasks to be performed.

Additionally, duties of this position include:

- a. the actual training of personnel.
- b. maintenance of training records.
- c. random inspections to verify adherence to safety rules and policies.
- d. completion of specific tasks identified within our OSHA compliance programs found in Section III of this safety program.

Our Safety Program Administrator is: Jayne Owen

The duties of this position may be delegated to other personnel who are competent persons by virtue of training or experience.

The responsibilities of this position may not be further delegated.

EMPLOYEE INVOLVEMENT

All employees are encouraged to participate actively in our safety & health program. Do not hesitate to point out perceived safety deficiencies to your supervisor or the competent person -- you may prevent an injury to yourself or a fellow worker. With the goal of providing a safer worksite for all of us, employee suggestions for improving safety management are welcomed and encouraged. Never perform any task on which you are not confident in your understanding of the safety procedures. If in doubt, ask your immediate supervisor for guidance.

HOUSEKEEPING

Housekeeping? On a job site? What's that all about? It's about safety! Employees are to maintain a neat and orderly work area *as far as practical*. Housekeeping and general cleanliness have a direct effect on safety and health. Proper housekeeping can prevent slips and falls, allow easy egress in the event of an emergency, prevent falling object injuries, and enhance fire safety. Below listed are general housekeeping rules:

- a. walking/working surfaces shall be kept clean and dry.
- b. do not allow construction debris to accumulate.
- c. stored materials will be neatly stacked at the job site.
- d. containers, when not in use, will be sealed.
- e. no objects will be left unattended on stairways.
- f. entrances and exits will be properly marked and not blocked.
- g. tools shall be properly cleaned and put away after use.

EMERGENCY ACTION PLAN

An Emergency Action Plan, if appropriate, will be posted at the job sites along with emergency telephone numbers and an escape route diagram.

After a hazard assessment of a job site, the Safety Director may determine that conditions may develop that could possibly warrant an evacuation. In this case, an emergency action plan will be developed to address the threat. Certainly, if work is being done at a hazardous chemical plant, for example, an emergency action plan is required and coordination will be made with the facility operator.

Events may occur which dictate the evacuation of a job site such as a fire, explosion, power failure, etc.. Additionally, events may occur which dictate the need for emergency medical responders. These sets of events fall under our Emergency Action Plan and a multitude of objectives must be met.

The first and foremost objective is the safety of all our personnel. To achieve this level of safety, our plan is designed to get personnel away from danger, treat injury, and provide for a thorough and accurate accounting of all employees.

There may be situations where certain employees, trained in first aid and/or fire fighting procedures, may prevent a small emergency situation from becoming a major disaster. In these types of situations, specifically identified employees will remain to perform the function for which they are trained, provided they may perform these duties in a safe manner. At no time will any employee put himself/herself at risk.

To the extent possible, job sites will have clear, direct, egress.

The actual implementation of this plan must be direct and carried out without confusion. Employees must know how to alert others, how to call for assistance, the location of fire extinguishers and first aid kits, the escape route, and the rendezvous point (being accounted for so that others do not put themselves at risk looking for a person who has already reached safety).

EMERGENCY MEDICAL RESPONSE

Should an injury occur that requires an emergency medical responder, the below listed actions will be taken in order given:

1. Call 911 or the emergency response number posted on the job site.
 - a. If the absence of 911 service, the telephone numbers of physicians, hospitals, or ambulances will be conspicuously posted with our emergency phone numbers.
2. Provide any medical assistance you are trained and certified to do.
DO NOT provide any medical assistance you are not trained to do.

3. Designate an individual to direct the emergency responders to the injured person and provide Material Safety Data Sheets if applicable.
4. Notify the competent person who, in turn, will notify the office.

FIRE PREVENTION PLAN

Fire Prevention deals not with handling a fire emergency, but rather preventing a fire in the first place.

To reduce the likelihood of a fire, personnel are to adhere to the following rules:

1. Smoking is allowed only in designated areas and smoking materials will be totally extinguished and placed in the appropriate receptacles.
2. All chemical products will be handled and stored in accordance with the procedures noted on their individual MSDS.
3. Heat producing equipment will be properly maintained and operated per the manufacturer's instructions to prevent accidental ignition of combustible materials.
4. Precautions will be taken when working with an open flame (such as welding) and those areas will be made fire safe by removing or protecting combustibles from ignition.
5. Combustible liquids must be stored in approved containers.
6. Chemical spills must be cleaned up immediately. This is particularly important for combustible and reactive liquids. Damaged chemical containers and cleanup materials must be properly disposed.
[Note: Exercise care! Information on appropriate personal protective equipment; proper disposal; proper cleanup procedures; required ventilation, etc. is found on the product's MSDS.]
7. Combustible liquids and trash must be segregated and kept from ignition sources.
8. Keep clear access to fire hydrants as well as portable fire extinguishers.
9. Personnel will be notified by their Supervisor or the competent person of any unusual fire hazard conditions existing on a job site.
10. Good housekeeping, good housekeeping!

PORTABLE FIRE EXTINGUISHERS

All personnel will receive instruction on portable fire extinguishers to include general principles of use, the hazards involved in the incipient state of fire fighting, inspection, maintenance, and location. This training will be given prior to initial job assignment and annually thereafter.

- a. Fire extinguishers will be visually inspected monthly for general condition and adequate charge. They will be serviced and certified by qualified personnel at least annually.
- b. Portable fire extinguisher locations will be clearly identified and easily accessible.

Portable fire extinguishers will be distributed as indicated below:

<u>CLASS</u>	<u>DISTRIBUTION</u>	<u>NOTES</u>
A "A" on a green triangle	75 feet or less travel distance between the employee and the extinguisher	Use on wood, paper, trash.
B "B" on a red square	50 feet or less travel distance between hazard area and the employee	Use on flammable liquid, gas.
C "C" on a blue circle	Based on the appropriate pattern for the existing Class A or Class B hazards	Use on electrical fires.
D "D" on a yellow star	75 feet or less travel distance between the combustible metal working area and the extinguisher or other containers of Class D extinguishing agent.	Use on combustible metals.

Appropriate portable fire extinguishers will be used, as noted above. Supervisors will ensure that at least one extinguisher is on each floor of a project near the stairway.

Using the wrong fire extinguisher on some fires can actually spread the fire. Using a Type A extinguisher on an electrical fire, for example, could cause serious injury. When a fire occurs, it is imperative to use the proper extinguisher.

FIRE PROTECTION

The phone number of the local fire department shall be posted with other emergency numbers.

If a fire should occur, all personnel and the local fire department will be notified. As in all emergency situations, per the American Trauma Society, people calling the fire department should:

- a. Remain calm.
- b. Speak clearly and slowly.
- c. Give the exact location.
- d. Describe the situation.
- e. Give the phone number from where you are calling.
- f. Do not hang up until told to do so.

FIRST AID & FIRST AID KITS

Should a medical emergency occur, other than minor scrapes and bruises, and it is serious enough to call for professional medical assistance, you should call the Emergency Response Number posted on the job site bulletin board. Before the first aid providers arrive, to the extent possible, clear the way so they can reach the injured employee in the most direct way possible.

If our employees are working at a location that is more than 3 or 4 minutes from medical assistance, we will utilize designated first aid providers who are trained and licensed in CPR/first aid; designated first aid provider as an additional job; and have completed training as part of our bloodborne pathogen program. Employees will not expose themselves to blood or other bodily fluids of other employees at any time.

Per OSHA, first aid is limited to:

- a. Using a non-prescription medication, such as aspirin, at non-prescription strength.
- b. Cleaning, flushing or soaking wounds on the surface of the skin;
- c. Using wound coverings such as bandages, Band-Aids™, gauze pads, etc.; or using butterfly bandages or Steri-Strips™.
- d. Using hot or cold therapy.
- e. Using any **non-rigid** means of support, such as elastic bandages, wraps, non-rigid back belts, etc..
- f. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- g. Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
- h. Using eye patches.
- i. Removing foreign bodies from the eye using only irrigation or a cotton swab.
- j. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- k. Using finger guards.
- l. Using massages.
- m. Drinking fluids for relief of heat stress.

If an employee is injured and emergency responders have been called, stay calm and reassure the injured employee that help is coming.

Below is basic first aid for various common job site injuries. Mostly, it is what **not** to do.

MINOR BURNS

(Redness or blisters over a small area)

Flush with cold water; apply a sterile dressing.

Do not use butter on any burn.

Do not break open blisters.

MAJOR BURNS

(White or charred skin; blisters and redness over a large area; burns on face, hands, or genital area)

Cover with sterile dressing and seek medical attention promptly.

Do not apply salves, ointments or anything else.

Do not break blisters.

CHEMICAL BURNS

(Spilled liquid or dry chemical on skin)

Liquid - Flush with large amounts of water immediately
(keep water flow gentle).

Dry - Brush as much off as possible before flushing with water.

After flushing at least 5 minutes, cover with sterile dressing.

Seek medical attention promptly.

Do not use anything but water on burned area.

Do not break open blisters.

EYE - FOREIGN OBJECT

(Object visible; feeling of something in the eye)

Have patient pull upper eyelid over lower eyelid.

Run plain water over eye.

If object does not wash out, cover both eyes with a gauze dressing.

Seek medical attention promptly.

Do not rub the eye.

EYE - WOUNDS

(Wound on eyelid or eyeball; pain;
history of blow to eye area; discoloration)

Apply loose sterile dressing over both eyes.

Seek medical help immediately.

For bruising, cold compress or ice pack may relieve pain and reduce swelling.

Do not try to remove any embedded object.

Do not apply pressure to eye.

EYE - CHEMICAL BURN (Chemical splashed or spilled in eye)

Flush immediately with water over open eye for at least 10 minutes (20 minutes if alkali). It may be necessary to hold patient's eyelid open.

NOTE: In work situations where a possibility of eye (or body) exposure to corrosive materials exists, suitable facilities for quick-drenching or flushing will be provided in the immediately work area.

Cover both eyes with sterile dressing.

Seek medical help immediately.

Do not put anything but water in eye.

HEAT EXHAUSTION

(Fatigue; weakness; profuse sweating; normal temperature; pale clammy skin; headache; cramps; vomiting; fainting)

Remove from hot area.

Have victim lay down and raise feet.

Apply cool wet cloths.

Loosen or remove clothing.

Allow small sips of water if victim is not vomiting.

HEAT STROKE

(Dizziness; nausea; severe headache; hot dry skin; confusion; collapse; delirium; coma and death)

Call for immediate medical assistance.

Remove victim from hot area.

Remove clothing.

Have victim lay down.

Cool the body (shower, cool wet cloths)

Do not give stimulants.

When dealing with any injury, stay calm and never do anything unless you know what you are doing.

First Aid Kits:

The first aid kit containers will be weather proof. Their contents will be checked before being sent to a job site and at least weekly thereafter.

First aid kits are worthless if not readily accessible. Therefore, they will not be locked up on job sites.

First aid kits will be replenished as items are used. Sterile items will be individually wrapped and sealed and used only once. Other items such as tape or scissors can be reused and should be kept clean. In the absence of plentiful amounts of clean water, eye flush will be available.

The number of first aid kits to be found on the job site should be:

<u>Number of Persons Assigned to Job Site</u>	<u>Minimum First Aid Supplies</u>
1 - 5	10 Package Kit
6 - 15	16 Package Kit
16 - 30	24 Package Kit

Depending on the job site, first aid supplies will generally include: adhesive bandages, bandage compresses, scissors and tweezers, triangular bandages, antiseptic soap or pads, eye dressing, and other items that a consulting physician may recommend. The main purpose of a bandage, the most commonly used item in a first aid kit, is not really to stop the bleeding, but to keep the wound clean.

The three most important things dealing with first aid kits are:

1. They must be readily accessible.
2. They must be appropriate for the job site work involved.
3. Personnel must know how to use the contents of the first aid kits.

Individual items within the kit that must be sterile must be wrapped and sealed until their one-time use. Other items such as tape or scissors can be reused and should be kept clean.

The supplies consumed in first aid kits can actually be used as a safety tool. For example, if a kit constantly needs replacement of bandages which have been used for minor cuts, there is an obvious problem that the cuts are happening in the first place. Actual trends can be established and corrective procedures initiated such as protective gloves or handling practices.

Improper medical treatment can be more dangerous than no treatment at all.

SANITATION

SANITATION. - 1926.51

Potable Water:

From a safety standpoint, you must not neglect your need for potable (drinkable) fluids. Water is not only the most abundant of all compounds found on the earth, it is the most abundant part of you -- actually about 65% of you is water.

On construction sites, exertion and heat dictate the need for plenty of water.

Potable water will be available on job sites. If portable containers are used, they will be clearly marked [Potable Water]; capable of being tightly closed;

and equipped with a tap. These containers will be used for no other purpose than supplying drinking water. Non-reusable (single service) cups in a sanitary container will be provided drinking as well as a receptacle for disposing of used cups. Employees are reminded of their need for adequate amounts of water.

Non-Potable Water:

Outlets of non-potable water should be clearly identified as such, through appropriate signage, and non-potable water may never be used for drinking, washing, or cooking.

Toilets:

Toilets will be provided at construction sites according to the below table:

<u>Number of Employees</u>	<u>Minimum Number of Facilities</u>
20 or less	1
20 or more or more	1 toilet seat and 1 urinal per 40 workers
200 or more	1 toilet seat and 1 urinal per 50 workers

Toilet facilities would include, unless prohibited by local law:

- a. Privies (where their use will not contaminate ground or surface water)
- b. Chemical Toilets
- c. Recirculating toilets
- d. Combustion toilets

Washing Facilities:

Adequate washing facilities will be provided in near proximity to the worksite if employees are working with contaminants that may be harmful to their health such as paint, coatings, or other chemical products. Paper towels and cleansing agents will be provided.

Showers and change rooms will be dictated by specific standards dealing with specific toxic materials (i.e., lead; asbestos).

Eating and Drinking Areas:

No employee will be allowed to consume food or beverages in any area exposed to toxic material.

LIFTING, PUSHING & PULLING

Back injuries are often caused by the obvious -- putting excessive strain on the lower back by lifting an object that is too heavy or awkward, or by bending and/or twisting while lifting.

However, lifting injuries are also caused by less obvious reasons:

- a. poor physical condition
- b. poor posture
- c. poor judgment (lifting, pulling, pushing an object that is obviously too heavy or awkward without seeking assistance or a mechanical lifting device.)
- d. lack of exercise
- e. excessive body weight

Proper lifting techniques are important for employee safety. Below are lifting techniques that will reduce the likelihood of injury:

- a. lift objects comfortably, not necessarily the quickest or easiest way.
- b. lift, push, and pull with your legs, not your arms or back.
- c. when changing direction while moving an object, turn with your feet, not by twisting at the waist.
- d. avoid lifting higher than your shoulder height.
- e. when standing while working, stand straight.
- f. when walking, maintain an erect posture; wear slip-resistant, supportive shoes.
- g. when carrying heavy objects, carry them close to the body and avoid carrying them in one hand.
- h. when heavy or bulky objects need to be moved, obtain help or use a mechanical aid such as a dolly, hand truck, forklift, etc..
- i. when stepping down from a height of more than eight inches, step down backwards, not forward.
- j. handle heavy objects close to the body -- avoid reaching out.
- k. lift gradually and smoothly. Avoid jerky motions.
- l. maintain a clear line of vision.

SLIPS, TRIPS & FALLS

Slips, trips, and falls are among the most common job site accidents and they are easily preventable. Below are some of the causes of slips, trips, and falls:

- a. running on the job site.
- b. engaging in horseplay.
- c. working off a ladder that is not firmly positioned.
- d. carrying an object that blocks line of vision.

- e. work boots not laced or buckled.
- f. working off a scaffold without safety rails.
- g. using ladders that have oil and grease on the rungs.
- h. not using a handrail on steps.
- i. messy work areas with debris strewn about.
- j. not paying attention to what one is doing.

This list can go on and on, but all the above are easily preventable by adherence to common safety procedures, common sense, and awareness of potential hazards on the job site.

DRUGS AND ALCOHOL

With the exception of over the counter drugs such as aspirin or drugs prescribed by a physician, there shall be no drugs or alcohol on any job site. Alcohol and drug abuse cause an unacceptable level of safety hazard not only for the offending employee, but for others in the vicinity. Those found to be under the influence of drugs and/or alcohol will be immediately removed from the job site by the competent person and further disciplinary action will be taken by the Safety Director.

Employees taking prescription medication that reduces motor skills should report this to their supervisor for appropriate work assignment.

Chemical dependency is a devastating problem for not only the employee, but also the employee's family and co-workers. For obvious safety reasons, it cannot be tolerated in the workplace. Those with such a problem should seek professional help. The Safety Director will assist any employee in finding appropriate treatment should they voluntarily come forward.

SMOKING

There shall be no smoking except in designated smoking areas. Under no circumstances will there be smoking during refueling of vehicles or within 50 feet of flammable materials.

ACCIDENT INVESTIGATION

The purpose of Accident Investigation is to prevent the same type of accident from reoccurring. An accident investigation will begin immediately after the medical crisis is resolved. The competent person/supervisor on the job site will complete an Accident Investigation Form as soon as feasible. The five questions that must be answered are: Who? What? When? Where? and most importantly, Why did the accident happen?

Apparently simple accidents may actually be caused by many complex reasons. Example: a worker is using a claw hammer on a working surface more than six feet above the ground. The hammer head breaks off and strikes a worker below who is not wearing a hard hat. Why did this accident happen? How can it be prevented? With just the facts presented, the fault would seem to rest with the worker who was struck by the falling object. Accident investigation may reveal other contributing factors by answering questions like:

- a. Were hard hats required on the project, were they available, and was this policy enforced by the supervisors?
- b. Were precautions taken to prevent objects from falling from above, such as a controlled access zone (CAZ)?
- c. Did the worker inspect his hammer before use? Was he driving nails -- the job for which a claw hammer is designed -- or pounding metal beams?

After determining the cause of the accident, steps can be taken to prevent a reoccurrence. Near-miss mishaps, events which result in no injury or damage, should be investigated because even though the outcomes are different, the causes are the same.

POSTINGS

On every job site there will be a prominently displayed bulletin board or area for postings. Every employee must be aware of this policy. Certain postings are required as a matter of law in all cases and other postings are required depending on circumstances and types of work being done.

In all cases, the following must be posted to meet OSHA requirements:

- a. OSHA Form 3165, *It's the law!*
- b. During the period from 1 February through to April 30, OSHA Form 300A, *Summary of Work-Related Injuries and Illnesses*, must be posted for work-related injuries and illnesses which have occurred during the previous year.
- c. Emergency phone numbers and site address for emergency response.

If appropriate, the following must be posted:

- a. OSHA citations.
- b. Notice of informal hearing conference.
- c. Names and location of assigned first aid providers.
- d. Air or wipe sampling results.
- e. Emergency action plan.

RECORDKEEPING: INJURIES & ILLNESSES

OSHA Forms 300; 300A & 301

As a matter of law, all employers with 11 or more employees **at any one time** in the previous year must maintain OSHA Form 300, *Log of Work-Related Injuries and Illnesses*, OSHA Form 301, *Injury and Illness Incident Report*, and OSHA Form 300A, *Summary of Work-Related Injuries and Illnesses*.

OSHA Forms 300 and 301 are used to record and classify occupational injuries and illnesses. The information on the OSHA Form 300 related to employee health and must be used in a manner that protects the confidentiality of the employees to the extent possible. Recordable injuries and illnesses must be entered on OSHA Forms 300 and 301 within seven (7) days of receiving information that a recordable injury or illness has occurred.

Retention of Forms:

Old OSHA Forms 101 and 200 as well as OSHA Forms 300 and 301 will be retained for five years following the year to which they relate.

Items to be recorded on OSHA Forms 300, 300A and 301:

Work related injuries and illnesses and fatalities are to be recorded using the criteria found in Part 1904, *Recording and Reporting Occupational Injuries and Illnesses*.

Injuries and illnesses must be recorded if they result in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, or if the injury or illness involves a significant injury diagnosed by a physician or licensed health care professional even if it does not meet the forgoing conditions.

NOTE: First aid (which is not reportable) is defined in 1904.7(b)(5)ii.

Employee Involvement:

As a matter of policy, all work-related accidents and injuries are to be immediately reported to the competent person/supervisor on a job site who will complete an accident investigation form. This will be forwarded to the Safety Director who will extrapolate appropriate information for completion of the OSHA Form 300.

Catastrophic Reporting Requirements:

Within eight (8) hours after the death of any employee from a work-related incident or the in-patient hospitalization of three (3) or more employees as a result of a work-related incident, either in person or by telephone, the OSHA

Area Office nearest to the site of the incident will be notified. OSHA may be contracted for this purpose using a toll free telephone number: 1-800-321-6742.

Location of OSHA Forms 300 and 301:

As a general rule, the OSHA Forms 300 and 301 will be maintained in our main office. However, in the event that a project is to last more than one year, that job site will be considered a fixed establishment and maintain its own OSHA Forms 300 and 301.

INCIDENCE RATE

One indication of the success of our safety effort is our “incidence rate”. When bidding a job, our incidence rate could be a determining factor in a successful bid. The incidence rate is determined by the following formula:

$N/EH \times 200,000$ where:

N = number of injuries and/or illnesses

EH = total hours worked by all employees during the calendar year.

200,000 = base for 100 full-time equivalent workers
(working 40 hours per week, 50 weeks per year).

To find the “Lost Workday Injury Rate” (LWDI), the following formula is used:

$LWDI \text{ Rate} = (\# \text{ LWDI's} \times 200,000) / \# \text{ employee hours worked}$

LWDI = sum of LWDI's in reference years

employee hours worked = sum of employee hours in reference years

200,000 = base for 100 full-time equivalent workers
(working 40 hours per week, 50 weeks per year).

When accidents and injuries occur, they have an immediate detrimental impact on those employees involved. Additionally, they have a potential lingering negative impact on our company and our ability to get work.

SAFETY MEETINGS

Scheduled safety meetings provide an opportunity for reinforcing the importance of general safety as well as specific work related procedures applicable to the work at hand. Properly prepared safety meetings will focus on one or two topics and be direct and to the point. All safety questions will be addressed and interactive participation is encouraged.

ENFORCEMENT

It is expected that all employees will abide by our safety rules and guidelines not only to protect themselves, but also to protect their fellow workers from harm. Should a safety violation occur, the following steps will be taken by the employee's immediate supervisor:

- a. **Minor Safety Violations:** Violations which would **not** reasonably be expected to result in serious injury.
 1. The hazardous situation will be corrected.
 2. The employee will be informed of the correct procedures to follow and the supervisor will ensure that these procedures are understood.
 3. The supervisor will make a written report of the occurrence using our Enforcement Documentation Form and inform the employee that this documentation will be forwarded to the Safety Director for a retention period of one year.
 4. A repeat occurrence of the same minor safety violation is considered substantially more serious than the first.
- b. **Major Safety Violations:** Violations which would reasonably be expected to result in serious injury or death.
 1. The hazardous situation will be corrected.
 2. The employee will be informed of the correct procedures to follow and will impress upon the individual the severity of the violation and the likely consequences should this type of violation be repeated. The supervisor will ensure that the individual understands the correct procedures and will be cautioned that a reoccurrence could result in disciplinary action up to and including discharge.
 3. The supervisor will make a written report of the occurrence using our Enforcement Documentation Form and inform the employee that this documentation will be forwarded to the Safety Director for a retention period of one year.
- c. **Willful Major Safety Violations:** Intentional violation of a safety rule which would reasonably be expected to result in serious injury to the employee or a fellow worker.
 1. The hazardous situation will be corrected.

2. The employee will be removed from the job site, the event will be documented and forwarded to the Safety Director, and the employee will be discharged.

Employees are to understand that the primary purpose of documenting safety violations is to ensure that the important business of employee safety is taken seriously and that the potential for injury is reduced to the lowest possible level.

Schedule of Enforcement Actions for Violations within a 1 Year Period

Minor Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	1 Day Off
2nd	Written Notice	2nd	3 Days Off
3rd	1 Day Off	3rd	Dismissal
4th	2 Days Off		
5th	3 Days Off		
6th	Dismissal		

Major Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	4 Days Off
2nd	2 Days Off	2nd	Dismissal
3rd	4 Days Off		
4th	Dismissal		

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