



WITTWER CONSTRUCTION CO., INC. CORPORATE HEALTH & SAFETY POLICY STATEMENT



PURPOSE

The purpose of this statement is to formally communicate the corporate position on Occupational Safety and Health.

SCOPE

This Corporate Safety Policy Statement applies to all divisions, subsidiaries and companies of this corporation.

RECORDS

A copy of this Corporate Safety Policy Statement will be posted on all safety bulletin boards.

Policy Statement

The Company is committed to providing a healthy and safe working environment for every employee. Toward that end, the company is guided in all its operations by an established Health and Safety Program. All personnel will observe the rules and procedures in this program, as a moral and legal responsibility and as a sound business policy.

It is the company's goal always to maintain an effective safety program to guard against accidents, injuries and illnesses. All members of management and supervision are charged with the responsibility of preventing incidents or conditions that could lead to occupational injuries or illness and for developing the proper attitude of employees toward accident prevention, instructing employees in the recognition of hazards and insuring that all operations are performed with the utmost regard for safety.

While the ultimate success of a safety and health program depends upon the full cooperation of each individual employee, it is management's responsibility to provide a safe environment in which to work. Health and safety must be considered an integral part of quality control, cost reduction and job efficiency. Every supervisor will be held accountable for the safety performance demonstrated by employees under his or her supervision.

The Health and Safety Program is designed to reduce the number of injuries to a minimum. Unfortunately, when accidents occur every segment of our operation, as well as the lives of our employees and their families, suffers. Therefore, our Health and Safety Program shall be interwoven into every phase of the business and will be enforced uniformly, consistently and swiftly.

President



Wittwer Construction Company, Incorporated

Safety Program Responsibility

PURPOSE

To provide a complete and clear description of safety responsibilities for all employees. It is important for all employees to understand not only their responsibilities but also the responsibilities of fellow employees.

DEFINITIONS

Competent Person—Employee Capable of identifying existing and predictable hazards and hazardous working conditions and is authorized to take prompt corrective measures to eliminate them

PROCEDURE

All levels of management and supervision are identified by Wittwer Construction Co. Inc. as *competent persons* charged with the responsibility of preventing conditions that could lead to occupational injuries or illness. While the ultimate success of our safety and health program depends upon the full cooperation of each employee, it is management's responsibility to see that safety and health rules and procedures are adequate and enforced, and to see that effective training and education programs are employed to the best advantage.

RESPONSIBILITY

Corporate Management/Safety Director

- Communicate safety information and the corporate safety commitment.
- Administer Safety Policies and Procedures within the framework of the company Corporate Safety Procedures Manual with particular emphasis on potentially hazardous operations.
- Accompany inspectors during inspections and properly document any events arising out of OSHA inspections, corporate safety audits or other formal type safety inspections conducted at the division or project site by outside agencies.
- Ensure compliance in the following areas; OSHA compliance programs, employee safety awareness and training, monitoring and investigation of worker compensation claims and accident occurrence, and reporting requirements are met. (200 Log, First Report of Injury, Insurance Claims, etc.)
- Conduct periodic job site safety inspections, prepare documentation of health, safety and environmental concerns resulting from inspections, and make recommendations for corrective action to alleviate problematic conditions.
- Provide field/shop supervisors with required protective equipment and materials.
- Investigate all accidents, injuries, fires, property damage, and other safety and environmental



related incidents, and issue required reports in a timely manner

Superintendents and Foremen

- Enforce all safety policies and procedures.
- Ensure all accidents are reported, thoroughly investigated and corrective action is taken.
- Follow up on all reported safety violations to ensure corrective action is taken.
- Attend supervisor safety training conducted by safety director.
- Implement and administer safety training in accordance with company safety training requirements.
- Communicate to the safety director the need for personal protective equipment, fire protection equipment and other safety-related equipment required to meet the project site's needs.
- Display and maintain publicity materials on site bulletin boards, such as posters, safety signs, banners, and distribute safety literature.
- Take immediate corrective action whenever unsafe conditions and when unsafe acts are noted.

All Employees in the Company

- Read, understand, and follow all company safety policies and procedures.
- Perform all duties in a safe manner.
- Report all unsafe acts and conditions.
- Report all accidents immediately.
- Wear all personal protective equipment that is required and maintain the equipment in good condition.
- Set an example of safe working practice and follow all safety regulations.
- Participate in all safety training sessions.



Wittwer Construction Company, Incorporated Safety Violation & Disciplinary Action

PURPOSE

To support the enforcement of good safety performance and to eliminate repeated or continuing safety violations by the use of appropriate disciplinary measures.

OBJECTIVE

The primary objective of the company safety program is to provide a safe work environment for all employees. Foremen or supervisors are required to issue appropriate specific safety instructions to all employees prior to assigning them work. Foremen or supervisors are responsible for coordinating work with other supervisors in the work area to ensure that all work can be accomplished safely. Each employee is individually responsible for complying with each of the provisions of the Corporate Safety Program, in addition to those safety instructions issued by the employees' foreman or supervisor, either verbally or in writing. However, when Safety Policies and Procedures are violated or individuals continue to be involved in accidents or infractions, disciplinary action must be considered, in order to emphasize the gravity of the situation and bring about desired improvement.

Each employee who reports for work will be given a safety orientation as a part of the general hiring process. During this orientation, the company's positive attitude toward working safety will be stressed and the employee will be advised that safety compliance is a condition of work. The safety program will be explained and safe responsibilities will be clearly defined.

When an employee is observed committing an unsafe act, the employee is to be informed by means of a formal safety notice letter. The exact nature of the violation and what is acceptable must be thoroughly explained to the employee. A copy of the written warning will be given to the employee's supervisor and a copy placed in the employee personnel file.

Violations of safety guidelines may result in sanctions of varying severity up to termination of employment.

Wittwer Construction Company, Incorporated Safety Incentive Program

PURPOSE

To recognize and reward positive attitudes toward safety and the utilization of safe practices and procedures on the road, project sites, shop and office.

OBJECTIVE

The primary objective of the safety incentive program is to reward safety. A positive attitude toward safety and the utilization of safe practices and procedures can benefit employees, the company, and the communities in which we work. In addition to reprimanding unsafe practices, it is the policy of Wittwer Construction to reward positive attitudes toward safety and records of safe operation. Safety is valuable and worthy of recognition and reward.



SAFETY AWARDS:

In order to recognize a commitment to safety and accident free operation, the company has created several awards that will be given annually. Safety is important and should be rewarded.

Wittwer Safe Driving Award

This award is given to all Wittwer certified drivers, employed full-time, who have a driving record free of moving violations and accidents. Truck drivers receiving this award will be considered for the Virgil R. Mistler Safe Driving Award. Winners of the Safe Driving Award will also be entered in a drawing for a prize of considerable value. A \$100 safety bonus will be awarded to each recipient of the Wittwer Safe Driving Award. Winners of safe driving awards will also be entered in a drawing for a price of considerable value.

Virgil Mistler, Jr. Driving Award

This award honors the safe driving record of Virgil Mistler, a long time Wittwer Construction employee who has exhibited an exemplary driving record in a career that has spanned over 25 years and millions of over the road miles. This award will be presented annually to one Wittwer truck driver exhibiting a record free of accidents and moving violations, and an attitude toward safe driving that serves as a model to other drivers. All truck driving recipients of the Wittwer Safe Driving Award will be considered for the Mistler Award.

Safe Project Award

This award will be given annually to superintendents and their crews, that in the previous year, exhibited a commitment to safety and an outstanding accident record. Members of award winning crews receive a \$100 safety bonus.

Safety Training Compliance Award

This award will be given annually to superintendents and foreman who participate in all required safety training seminars and who conduct and submit safety meeting records in a timely and accurate manner. A \$500 safety bonus will be awarded to each recipient of the Safety Training Compliance Award.



Wittwer Construction Company, Inc.

Alcohol and Drug Program

Statement of Substance-Free Workplace Policy

STATEMENT OF POLICY

It is the policy of Wittwer Construction Company, Incorporated to maintain a work environment that is safe for all persons, including the community, and conducive to attaining high work standards. To achieve these objectives, the company is committed to a strong stand against substance abuse. This includes the misuse of legal drugs, any activity with illegal drugs, the presence of alcohol in the workplace, the use of alcohol in the workplace, and being in the workplace while under the influence of alcohol, as they are not conducive to the company's objective of maintaining a safe work place. Research on the conduct described in this policy shows that this type of conduct causes impairment of the user's faculties and has the substantial likelihood of resulting in injury to the user, others and the community at large.

It is Wittwer Construction's policy to maintain a drug and alcohol-free workplace and prohibit the possession, use, distribution, or sale of drugs and drug paraphernalia. The company will strictly enforce this policy.

PROHIBITED CONDUCT

The company prohibits the following conduct in all company vehicles, all personal vehicles while on company business, offices, workplaces and job locations at all times:

No employee shall distribute, dispense, manufacture, possess, sell or use illegal drugs or controlled substances including but, not limited to marijuana, cocaine, "crack", heroin, phencyclidine (PCP), morphine, cocaine, methadone, methaqualone, LSD, narcotics, amphetamines, opiates, barbiturates and anabolic steroids;

No employee shall abuse legal ("prescribed") drugs including but not limited to the distribution, dispensing or selling prescription drugs or abusing legal drugs in any manner contrary to the specified restrictions imposed by valid prescription.

No employee shall report for duty or remain on duty while under the influence of alcohol.

No employee shall be on duty or operate a commercial vehicle while the employee possesses alcohol.

No employee required to take a post-accident alcohol test shall use alcohol for eight (8) hours following the accident or until he or she undergoes a post-accident alcohol test, whichever occurs first.

No employee shall refuse to submit to a post-accident, random, reasonable suspicion, return-to-duty, or follow-up alcohol or drug test.

No employee shall report for duty or remain on duty when the employee uses any controlled substance, except when use is pursuant to the instructions of a physician who has advised the employee that the substance does not adversely affect the employee's ability to perform their job duties in a safe manner.



Where job related, and justified by business necessity, in the opinion of management, the company may require that use of prescription and non-prescription drugs be reported to their supervisor, who will then report to a company officer. An employee who questions whether a prescribed drug or over-the-counter drug is prohibited by this policy, should contact their supervisor prior to the employee's beginning work-related duties.

DRUG FREE WORKPLACE COMMITMENT

Wittwer Construction is frequently engaged in federal work for which the company is required to comply with the Drug-Free workplace act of 1988.

As a condition of new and continued employment with the company, all employees must:

1. Certify that they will abide by the terms of this policy by refraining from manufacturing, distributing, dispensing, possessing, selling or using illegal drugs and/or controlled substances;
2. Notify the company, in writing, of any state or federal criminal drug statute conviction, including a plea of no contest (nolo contendere), for a violation occurring in the work place, no longer than 5 calendar days after the date of conviction (or entering the plea). Written notice of a conviction described above must be submitted to your supervisor, foreman, or company officer within the 5-day period. Failure to submit this notice to the appropriate person within 5 days may result in reprimand of varying severity and may include the immediate termination of employment.

Disciplinary action for a conviction will be instituted within thirty (30) days of receipt of notice by the company as detailed below.

3. Sign the employee/applicant consent and waiver form. When an employee signs the consent and waiver form they are agreeing to submit to drug and/or alcohol testing. Refusal to sign this form may subject the employee to termination of employment, immediate removal from the premises and prohibit future access to company premises and job locations.
4. Notify the corporate safety director of any known violation of the company's drug-free workplace policy. Employees who fail to report violations of the drug-free workplace policy may result in reprimand of varying severity and may include the immediate termination of employment.

CONSEQUENCES OF POLICY VIOLATION

Violation of any of the aforementioned company policies, engagement in any prohibited conduct, or a confirmed positive drug/alcohol test may result in reprimand of varying severity and may include the immediate termination of employment, immediate removal from the premises and being barred from future access to any company premises or job locations.

Suspension Pending Investigation

Any employee who is the subject of an investigation regarding possible violation of the Drug-Free Workplace policy may be placed on temporary suspension without pay pending full investigation of the matter. If such an investigation results in a finding of no violation of policy or evidence of prohibited conduct, the suspended employee will be returned to work and will be paid lost wages during the suspension based on a 40 hour work week.



Return To Work/Light Duty Policy

Research suggests that injured or ill employees may pose a significant danger to others in safety sensitive workplaces, such as job sites involving the heavy construction of highway infrastructure. This policy is intended to promote the safety of all employees, and the public, by eliminating hazards that may accompany the presence of an injured or ill employee in a safety sensitive workplace.

In the event of an occupational injury, physical condition or disease requiring the care of a physician and requiring time off from work, the employee must obtain a doctor's release before returning to work. This release must indicate the employee's level of occupational fitness and any physical restrictions or limitations. Wittwer Construction Company, Inc. also reserves the right to require an employee, who has missed work due to illness (whether related or not related to work) but has not seen a physician, to obtain a physical examination from his or her physician or by a physician or clinic selected by the company.

When employees return to work with physical restrictions, the company will make a reasonable effort to provide the injured with a position requiring fitness levels consistent with the doctor's recommendations.

PROCEDURE

With the injured employees' knowledge, the following options may be considered by appropriate company personnel in order to accommodate the employee who returns to work following an injury or illness:

- A. Determination of work availability by the appropriate company personnel.
- B. Transfer the employee to a job position with physical requirements that are consistent with the doctor's recommendations.
- C. If the above two cannot be executed, on a case by case basis, depending on current work availability, the appropriate company personnel may develop a job with physical requirements that are consistent with the doctor's recommendations.
- D. If the injured employee does not accept or does not complete the job that is offered, disciplinary action up to and including termination is possible.



Wittwer Construction Company, Inc.

Safety Committees

CORPORATE SAFETY PLANNING COMMITTEE

The company has established a Corporate Safety Planning Committee consisting of the COO, President, Vice President(s), and the Corporate Safety Director. This committee shall meet at least once each quarter and shall:

- Establish safety policy and procedures.
- Advise on safety policy matters.
- Communicate safety policies to the various operating center safety committees.
- Monitor legislation and regulation changes as they relate to the safety policy.
- Monitor safety performance.
- Advise on recommended policy changes.
- Identify and evaluate job hazards and recommended corrective action.
- Make safety equipment recommendations.
- Evaluate and recommend training requirements and safety training programs for job superintendents.
- Recommend policy enforcement procedures.
- Monitor program effectiveness and recommend improvements.

COMPANY-WIDE SAFETY COMMITTEE

A committee consisting of all Planning committee members and all Superintendents/Foreman. This committee is simply a communications device to facilitate active thinking and participation in maintaining a safe work environment. The following guidelines may be used.

- The safety committee will meet biannually.
- All accidents and accident investigation reports are to be reviewed and discussed to share insights which may prevent reoccurrence.
- Review and discuss findings of joint construction site safety inspection and any other inspection conducted in the previous week.
- Discuss recommendations on safety improvements brought to light as a result of the inspection.
- Discuss safety concerns and suggestions.



- Discuss construction and production for coming month and safety issues to be addressed.

COMMITTEE MEMBERSHIP STRUCTURE

Chairman/Safety Director

- Develop a written agenda for the meeting.
- Lead the safety committee meetings, following the agenda and encouraging open discussion.
- Designate one committee member per month to participate in the joint facility inspection.
- Communication of safety committee minutes.
- Start meetings on time and limit length of meeting to one-half hour.

Committee Member, Superintendents, Foreman

- Attend and actively participate in all safety committee meetings.
- Communicate safety concerns.
- Set an example of safe work and follow all safety regulations.
- Offer insight and assist accident investigation procedures.

Recorder

- Take minutes of all safety committee meetings.
- Make sure minutes are typed and distributed.

RECORDS

- Original shall be placed in file.
- Copy to each committee member.
- Copy to Corporate Safety Director.



Wittwer Construction Company, Incorporated

Work Area Hazard Assessment Policy

PURPOSE

Work area hazard assessment procedures provide a mechanism through which the information needed to anticipate, recognize, identify, and evaluate work area hazards can be obtained. The information thus gained is utilized in the design and implementation of employee safety and environmental protection programs.

SCOPE

These work area hazard assessment guidelines apply to all company divisions and field construction and maintenance projects. The outcome of the hazard assessments will be utilized in determining specific personal protective equipment requirements for employees.

SCOPE & POLICY

This procedure will be implemented on an as needed basis where a thorough understanding of all work area hazards has not been established.

REGULATIONS

Except to the extent that more explicit, or more stringent requirements are written directly into these guidelines, the primary regulatory reference relating to employee protection and the performance of work area hazard assessment activities shall be Title 29 Code of Federal Regulations Part 1926.20, 1926.35 and 1910.38. These regulations, promulgated and enforced by the Occupational Safety and Health Administration (OSHA), are applicable to the work performed by the company.

PROCEDURE

Work area hazard assessment activities shall proceed in at least two distinct phases:

Initial Assessment

- Prior to initial deployment of employees into a work area, a preliminary hazard survey of the work area(s) may be completed. The survey should be made by an individual who is familiar with the type of industrial process involved in recognizing and evaluating exposures to potentially harmful materials.
- The individual should be accompanied by qualified plant personnel to explain any process or steps in manufacture that are not evident to the surveyor. Among the personnel who are best suited to the role of guide for the investigator are the production superintendent, the foreman of the work area under investigation, and the client Safety Manager.
- This initial phase of assessment will provide information about the facility to be occupied, about the process, raw materials present, waste materials present, and will serve to provide information useful in the development of hazard communication and personnel protection programs.



- Once the initial assessment has been completed and the data obtained evaluated, the procurement of appropriate, necessary equipment and services can be initiated.
- Information obtained from the initial assessment will serve to facilitate deployment of the workforce in a manner that is safe, in conformance with applicable regulations, timely, and cost effective.

Periodic Assessment

- It is important to recognize that work area hazard assessment is a continuous process. For each phase of work, i.e., contract specification, a work area hazard assessment shall be performed and evaluated to define the hazards that the work area and/or assignment may pose. This assessment shall be used to develop the safety and health strategy for the next phase of work.
- In addition to the formal information gathering that takes place during the phases of work area hazard assessment described here, all work area personnel should be constantly alert for new information about work area conditions.
- The sections below detail the components of the two phases of work area hazard assessment and provide a general guide which should be adapted to meet each specific work situation.

Job Safety Analyses (JSAs)

In addition, Job safety analyses applicable to specific construction activities (Ditchlining, Box Culvert Construction) engaged in by WCCI are on file and disseminated to field supervisors

WORK AREA HAZARD ASSESSMENT

- Work area hazard information can be obtained by two methods: The preliminary survey and, The investigational survey.

PRELIMINARY SURVEY

- As much data as possible should be collected from facility/client personnel prior to personnel deployment into the work area. The preliminary survey relies heavily on information being provided by the facility operator/owner to the company. The preliminary survey is usually made with no equipment for measurement purposes other than those portable pieces of equipment that can be conveniently carried on the person, such as a sound level meter.
- The surveyors should always determine the presence of control measures and provide an opinion about: The probable need for or effectiveness of control, The type of personnel, in terms of training, skill, or knowledge of the potential hazards in the workplace, and The attitude of management, supervising staff, the personnel employed at the work site toward health and safety practices, along with the control measures currently in effect and proper maintenance procedures.
- Additionally, where possible, the following information should be incorporated into the preliminary survey: Exact location of the work area(s) within the facility, mapped locations of buildings, containers, impoundments, pits, ponds, and tanks, detailed description of the activity that is to be performed in the work area, and anticipated duration of the activity.
- Hazardous substances involved and their chemical and physical properties. Information



sources may include: company records, receipts, logbooks, ledgers, records from state and federal pollution control regulatory and enforcement agencies, state Attorney Generals Office, state occupational safety and health agencies, state Fire Marshal's office, waste storage inventories and manifests or shipping papers, and Interviews with facility personnel (all interview information should be verified).

- Vehicular traffic patterns/parking areas at the facility.
- Observations of labels, markings, or placards on containers or vehicles.
- Observations of deterioration or damage of containers or vehicles.
- Detection of unusual odors.
- Utilization of Preliminary Survey Data - Information obtained from the preliminary survey is to be used in the formulation of the project's hazard communication training program. Additionally, the data will assist the company in the selection of appropriate personal protective equipment for work activities.

INVESTIGATIONAL SURVEY

- Components of an investigational survey may include, but may not be limited to, the following: Monitoring the air for IDLH and other conditions that may cause death or serious harm (combustible or explosive atmospheres, oxygen deficiency, toxic substances), monitoring for ionizing radiation, visual observation for signs of actual or potential IDLH or other dangerous conditions, monitoring of welding operations for conditions of toxic metals exposure, measurement of ventilation systems for both volume and velocity characteristic, measurement of occupational noise exposure, measurement of organic vapor concentrations during painting operations, Inspection and monitoring of asbestos containing materials, and measurement of organic solvent exposures during facility maintenance operations. Some situations warrant special consideration: Any indication of IDLH hazards or other dangerous conditions should be regarded as a sign to proceed with care and deliberation. Extreme caution should be exercised in continuing the work area survey when such hazards are indicated. If IDLH or other dangerous conditions are not present, or if proper precautions can be taken, continue the survey.

INFORMATION DOCUMENTATION

Proper documentation and document control are important for ensuring accurate communication, ensuring the quality of the data collected, and providing the rationale for safety decisions. Documentation can be accomplished by recording information on the Hazard Assessment Form pertinent to field activities, sample analysis, and work area conditions.

HAZARD ASSESSMENT

Once the presence and concentrations of specific chemicals or classes of chemicals have been established, the hazards associated with these chemicals must be determined. This is done by referring to standard reference sources for data and guidelines on permissible levels of exposure, flammability, etc.

Threshold Limit Value (TLV) - TLVs can be used as a guideline for determining the appropriate level of worker protection. These values have been derived for many substances and can be found in Threshold



Limit Values for Chemical Substances and Physical Agents, which is published annually by the American Conference of Governmental Industrial Hygienists (ACGIH). The ACGIH defines three categories of TLVs: time-weighted average (TWA); short-term exposure limit (STEL) and ceiling (C). All three categories may be useful in selecting levels of protection within a work area. Refer to the Threshold Limit Values for Chemical Substances and Physical Agents for additional details.

Permissible Exposure Limit (PEL) - Permissible exposure limits are enforceable standards promulgated by OSHA. In many cases they are derived from TLVs published in 1968. The PEL for a substance is the 8-hour time weighted average or ceiling concentration above which workers may not be exposed. Although personal protective equipment may not be required for exposures below the PEL, its use may be advisable where there is a potential for overexposure.

Recommended Exposure Limit (REL) - A NIOSH recommended exposure limit (REL) is the workplace exposure concentration recommended by NIOSH for promulgation by OSHA as a PEL, but is not enforceable as is the OSHA PEL. In some cases, NIOSH as described time-weighted average concentrations in terms of 10-hour, rather than 8-hour averages.

IDLH Concentrations - IDLH exposure concentrations have been established by the NIOSH/OSHA Standards Completion Program (SCP) as a guideline for selecting respirators for some chemicals. The definition of IDLH varies depending on the source. For example, the Mine Safety and Health Administration Standard, Title 30 CFR Part 11.3(t), defines IDLH conditions as those that pose an immediate threat to life or health or that pose an immediate threat of severe exposure to contaminants such as radioactive materials that are likely to have adverse cumulative or delayed effects on health. The NIOSH Pocket Guide to Chemical Hazards defined IDLH concentration as the maximum level from which one could escape within 30 minutes without any escape-impairing symptoms or any irreversible health effects. The American National Standards Institute, Inc. (ANSI) defines IDLH as any atmosphere that poses an immediate hazard to life or produces immediate irreversible debilitating effects on health. Regardless of their exact definition, all IDLH values indicate whose concentrations of toxic substances from which escape is possible without irreversible harm should an employee's respiratory protective equipment fail. On projects, IDLH concentrations should be assumed to represent concentrations above which only workers wearing respirators that provide the maximum protection (i.e., a positive-pressure, full-face piece, self-contained breathing apparatus (SCBA) or a combination positive-pressure, full-face piece, supplied-air respirator with positive pressure SCBA are permitted. Specific IDLH values for many substances can be found in the NIOSH Pocket Guide to Chemical Hazards.

Potential Skin Absorption and Irritation - Information on skin absorption is provided in the ACGIH publication, Threshold Limit Values for Chemical Substances and Physical Agents and in OSHA standard 29 CFR Part 1910.1000 and other standard references. These documents identify substances that can be readily absorbed through the skin, mucous membranes, and/or eyes by either airborne exposure or direct contact with a liquid. This information, like most available information on skin absorption is qualitative. It indicates whether, but not to what extent, a substance may pose a dermal hazard. Thus decisions made concerning skin hazards are necessarily judgmental. In addition, many chemicals, although not absorbed through the skin, may cause skin irritation at the point of contact. Signs of skin irritation range from redness, swelling, or itching to burns that destroy skin tissue. Standard references can be used to determine whether a chemical may act as an irritant.

Potential Eye Irritation - Quantitative data on eye irritation are not always available. Where a review of the literature indicates that a substance causes eye irritation, but no threshold is specified, a competent health professional should be consulted to evaluate the data to determine the level of personal protection needed for workers.

Explosion and Flammability Ranges - The lower explosive limit (LEL) or lower flammable limit (LFL) of a substance is the minimum concentration of gas or vapor in air below which the substance will not burn when exposed to a source of ignition. This concentration is usually expressed in percent by volume.



Below this concentration, the mixture is too “lean” to burn or explode. The upper explosive limit (UEL) or upper flammable limit (UFL) of a substance is the maximum concentration of gas or vapor above which the substance will not burn when exposed to a source of ignition. Above this concentration, the mixture is too “rich” to burn or explode. The flammable range is the range of concentrations between the LFL and UFL where the gas-air mixture will support combustion. The flashpoint of a substance is the minimum temperature at which it gives off sufficient vapor to form an ignitable mixture with the air just above the surface of the substance. Ignition of a substance at the flashpoint is not continuous. The ignition temperature or auto-ignition temperature is the minimum temperature required to initiate or cause self-sustained combustion without an ignition source. When evaluating the fire or explosion potential in a work area, all equipment used should be intrinsically safe or explosion-proof. Where flammable or explosive atmospheres are detected, ventilation may dilute the mixture to below the LEL/LFL. However, ventilation is generally not recommended if concentrations exceed the UFL/UEL, since the mixture will pass through the flammable/explosive range as it is diluted. Note that combustible gas indicator readings may not be accurate when oxygen concentrations are less than 19.5 percent.

Hazardous Substance Information Form - Information on the chemical, physical, and toxicologic properties of each compound known or expected to be present in the work area should be recorded on a Hazardous Substance Information Form. Response personnel will then have the necessary health and safety information in one place, and can personnel be quickly briefed. As many reference sources as possible should be used to fill out the sheets because the information may vary from one source to another. Material Safety Data Sheets provided by chemical manufacturers is one source for this information.

Monitoring - Because work area activities and weather conditions change, an ongoing air monitoring program should be implemented after hazard assessment has determined that the work area is safe for routine operations.



Wittwer Construction Company, Incorporated

Safety Training Policy

SUMMARY

The company regards its employees as vital parts of the organization. As such, the company accepts the responsibility of providing a work place where the employee can do his job without injury to themselves or others. This section defines Safety Training Requirements and methods which have been developed by the Safety Director and the Corporate Safety Planning Committee to meet job requirements and safety objectives, and maintain compliance with OSHA standards.

SCOPE

The safety orientation handbook is to be used by all divisions. It will be used to train all employees.

SUPERVISOR SAFETY TRAINING

The company will provide special instruction to those who are responsible for field training activities. These sessions will be conducted quarterly. The purpose of these sessions include the following:

- Provide guidelines for developing, scheduling & delivery of safety awareness training for employees.
- Encourage safety awareness.
- Get employees actively involved in safety.
- Motivate employees to follow proper safety procedures.
- Enhance ability to Identify and Eliminate safety hazards.
- Introduce employees to new safety rules, practices and equipment.

The instructional curriculum may include but is not limited to the following:

- Corporate Safety Manual.
- Accident Reporting & Investigation.
- New Hire Safety Orientation Process.
- Hazard Recognition.
- Periodic Safety Inspection Procedure.
- OSHA Inspection Procedure
- OSHA 10 Hour for the Construction Industry
- Powered Industrial Truck Safety
- Hazard Communication

CONDUCTING SAFETY TRAINING

- An effective safety meeting must be planned and prepared in advance.
- Toolbox safety meetings or field safety meetings are to be conducted weekly and last approximately 10 minutes.
- All meetings are to be divided into two sections (1) the presentation itself and (2) a question and answer period.
- It is very important to allow those in attendance to participate. This will help to ensure that the message has been received.



- Use the safety training sign-in sheet to document the training.

SAFETY ORIENTATION TRAINING

Job Safety orientation shall be conducted prior to job start-up for all current employees assigned to the job. This training shall cover, but is not limited to, the following:

Company rules and regulations.

- General safety rules and requirements.
- Site hazards, unique to a specific job, or a divisional project.
- Safety operating procedures.
- Automated Safety orientation program, with voice over instruction, covering 11 general topic is presented to new employees.

NEW-HIRE SAFETY ORIENTATION

New employees will watch the New Hire Safety orientation program Safety Policies and receive other materials covering the following:

- General safety rules and requirements
- Safety Operating Procedures
- Overview of Safety Hazards Encountered During Highway Construction

ONGOING EMPLOYEE SAFETY TRAINING

All employees will attend regular safety meetings. At each meeting different topics will be discussed and any specific safety conditions or concerns will be focused on. During these meetings employees will be instructed on:

Tool Box Safety Talks

- the proper use of tools/equipment
- personal protection devices
- vehicle operations
- general site safety matters
- new or updated safety procedures

OSHA 10 Hr for the Construction Industry

Selected employees and all bilingual employees are required to attend the OSHA 10 hour for the construction industry curriculum. This workshop is presented once a year.

The effectiveness of the training given to our employees will hopefully result in a low number of injuries/accidents. That is why each division will be responsible for implementing whatever training program will ensure that his workforce receives sufficient training. The company will comply with OSHA, DOT, and EPA standards. In addition, supervisors will meet with the Safety Director regularly to receive updates and training on safety matters. Other employees will attend safety training seminars conducted by the safety director, AGC, OSC, and other safety organizations on a periodic basis.



SPECIALIZED TRAINING

Additional safety training for specialized procedures such as excavation/trenching safety, fall protection, or work zone hazards training will be provided to employees. First Aid/CPR training is conducted once a year.

RECORDKEEPING

Maintenance of records of training is required. Complete records are one of the most important resources in documenting compliance with the Safety Policies & Procedures. The following records shall be maintained by the site safety coordinator or office manager:

- New Hire Safety Orientation
- Formal OSHA Employee Safety Training Records
- Tool Box Safety Talks (shop or site safety information)
- Any other Specialized Safety Training

DOCUMENTATION

A log shall be kept of all employees and their level of orientation. This will enable more experienced personnel to help the new hires and track required safety training.

- The trainer will enter on the attendance log the date, name, topics discussed and length of meeting.
- Each employee will sign the attendance log.
- The log will be maintained in the safety file for record retention.

