

Road-Con Inc.
501 Garfield Avenue
West Chester, PA 19380

SAFETY PROGRAM

Table Of Contents

	<u>Page</u>
Statement of Chief Executive Officer.....	16
Responsibility For Safety	17
Safety Standards	20
Personal Protective Equipment	21
Fire Prevention and Protection.....	22
First Aid.....	24
Discipline for Noncompliance	25
Accident Investigation.....	26
Hazard Communication Program	27
Record Keeping and Safety Meetings.....	30

SAFETY POLICY

The safety, health and well-being of all employees is a major concern of Road-Con Inc. Therefore, accident prevention is of primary importance. Safety will always take precedence over production demands. Shortcuts should be avoided at all times.

The management of the company will take all practical steps to provide a safe and healthful work place. In its efforts to provide a safe work place, management has established the safety procedures outlined in the following pages. It is the responsibility of all personnel to comply with these procedures. It is expected that every employee will work together to achieve the common goal of accident prevention.

Edward J. McKenna, Jr.

Chief Executive Officer

Steve Rubino

Safety Officer

RESPONSIBILITY FOR SAFETY

All employees of Road-Con Inc. are responsible for ensuring compliance with the company safety program. To ensure policy conformance in daily business operations, the training, verification, communication and reporting needs must be identified within the safety program. To encourage active employee participation, a safety committee including volunteer members from various functional areas shall assist the Safety Officer and Safety Coordinator in program review. Line supervisors and managers shall be responsible for safety training, investigations and communication. Senior management is responsible for program creation, evaluation and support. Employees are responsible for following safety regulations, reporting unsafe acts or conditions, reporting all accidents, maintaining safe work areas and cooperating with the intent of the safety program. Specific duties of each group in the safety program include, but are not limited to:

ALL EMPLOYEES

1. Report any unsafe working condition to immediate supervisors.
2. Keep individual work areas clean and safe.
3. Report ALL accidents immediately to immediate supervisor.
4. Follow all safety rules.
5. When in doubt - Ask your supervisor.
6. Maintain positive attitude toward safety and cooperate fully to ensure a safe, healthful workplace for all employees.

SUPERVISORS & MANAGERS

1. Responsible for ensuring safety of all employees under their management.
2. Responsible for training employees in safe working practices and safety regulations.
3. Remove all unsafe working conditions immediately upon discovery and ensure situation is resolved appropriately. Report all such activities to the Safety Coordinator.
4. Investigate any reported accident immediately and complete the approved company accident report within one working day. Provide reports to the safety coordinator.
5. Considers an employee's accident record and attitude toward safety when evaluating that employee for a salary increase.
6. Enforce all safety rules with a positive attitude and stress the importance of a safe working environment to all.

SAFETY COMMITTEE (construction foremen and employees)

1. Hold weekly meetings and participate in improving the safety of the work environment. During those meetings they will discuss, among other things, accident reports, changes to existing safety policies, etc.
2. Communicate the need for safety, the objective of the safety program, and the importance of compliance to all fellow employees.
3. Report any potential safety program flaws or noncompliance work conditions to the Safety Officer.
4. Assist in reviewing safety program compliance and safety audits of functional areas.

SAFETY OFFICER

1. Coordinate all safety program activities within the company.
2. Evaluate safety procedures and activities to assure compliance with the safety policy.
3. Ensure safety training is performed and is adequate.
4. Review accident investigations and corrective action recommendations to ensure implementation.
5. Monitor the documented safety program to ensure effectiveness in achieving the objective of the safety policy. Recommend appropriate changes.
6. Manage safety inspections and audits to ensure safe working conditions.

SENIOR MANAGEMENT

1. Provide guidelines for safety program operation.
2. Evaluate procedures to ensure compliance with the company safety program.
3. Approve expenditures required to ensure a safe working environment and correction of any potential safety hazard.
4. Actively support and participate in the company safety program.
5. Ensure adequate training programs are in place for all levels of employees.

SAFETY STANDARDS

Guided by rules and regulations established and revised by OSHA, the safety standards will be made known to all employees on each job, including subcontractors. These standards are:

1. Housekeeping: Good housekeeping is the first rule of accident prevention in construction and should be of primary concern to all supervisors and foremen. Good housekeeping should be planned at the beginning of a job, carefully supervised, and followed to the final clean-up.
 - a) Provide adequate and proper storage for tools so they will not be needlessly scattered around.
 - b) See that material (in storage area, in transit, or at the work area) is piled or stacked correctly so that it cannot fall.
 - c) See that the work area is well lighted.
 - d) Provide adequate storage for oxygen and acetylene tanks. Never allow tanks to lay in dirt or mud, maintain them in an upright position, and replace caps when not in use. Do not store tanks inside and make sure they are chained or tied to eliminate the possibility of them falling over.
 - e) All lumber and items with projecting nails should be removed to a designated area. Lumber to be reused should have all projecting nails removed, and be properly stacked. Scrap lumber, debris, and other scrap materials should be removed to a designated disposal area.

PROPER WORK CLOTHING

1. Proper work clothing plays an important part in a safety program. Employees should wear clothes that are reasonably snug, particularly around the neck, wrists, and ankles. There should be no loose flaps or strings, and pockets should be kept buttoned.
2. Safety shoes are recommended for use by all construction workers. Shoes must be kept in good repair. Slipping accidents may occur when heels are worn; sharp objects may penetrate a thin sole. Workers will not be allowed to wear slip-ons, sneakers, or shoes that have been split or have holes cut into them for relief from corns or bunions. Supervisors will be responsible for seeing that employees wear proper clothing and shoes that are in good repair.

PERSONAL PROTECTIVE EQUIPMENT (PPE)

The following protective equipment will be issued to those employees who are exposed to the hazards indicated, and its use will be consistently enforced by the supervisor. Employees will be responsible for the careful use of such equipment issued to them, and return it when its use is completed. Failure to turn in issued equipment will result in the cost being paid for by employee.

1. Hard Hats – **ALL employees must wear hard hats regardless of their craft.** The only exception to this will be when the foreman feels that a hard hat will cause a safety hazard.
2. Goggles – To be worn when there is danger of eye injury from chipping or sawing, grinding, cutting, welding, and exposure to heavy dust, acids, or toxic liquids.
3. Face Shields – To be worn when full face protection is required in exposures similar to those listed under goggles. Welders **must** wear welding helmets.
4. Gloves – To be worn when exposed to heat, sparks, acids, corrosives, or electric.
5. Respirators – To be used under severe conditions of dust, fumes, gases, or oxygen deficiency.
6. Rubber Boots – To be worn when working in concrete or water.
7. Life Jackets – To be worn when working in deep water.
8. Flagmen Vests – To be worn by workers involved in the maintenance and protection of traffic.
9. Audible Back -Up Alarms – All vehicles will be equipped with an audible back-up alarm whenever no person is assigned to physically direct backing-up of equipment.

FIRE PREVENTION AND PROTECTION

Potential losses from fire include damage or total destruction of temporary construction facilities (shops in particular), building material, equipment and supplies, permanent construction, public property, and human lives.

1. Hazards:

- a) Temporary and permanent heating devices
- b) Electrical wiring and equipment
- c) Volatile liquids and gas storage
- d) Fueling operations
- e) Handling inflammable roofing compounds
- f) Burning refuse
- g) Poor housekeeping
- h) Welding and cutting
- i) Spontaneous combustion
- j) Spilled grease and oil
- k) Explosives, gases and dust
- l) Storage of inflammable materials

2. Prevention

- a) Stack combustibles and non-combustibles alternately in storage areas.
- b) Separate temporary structures.
- c) Isolate shops, inflammable liquid, and gas storage.
- d) Do not store large quantities of gas, oil, and greases in shops. Only the minimum amount needed for current work should be kept in shops.
- e) Store oxygen, acetylene, and LP gas cylinders in racks away from sources of heat and ignitions. Keep upright with caps in place.
- f) Use fire retardant material whenever practical in temporary structures.
- g) Provide escape exits wherever inflammables are used or stored.
- h) Keep fuel, oil, and grease spills cleaned up.
- i) Provide burn pit in locations where there is no danger of igniting surrounding grass, timber, etc.
- j) Provide covered containers for disposal of oily rags and other shop combustible waste.
- k) Keep scrap picked up as work continues.

- l) Never use gasoline for washing parts. Use an approved solvent with a flash point of at least 140 degrees such as diesel fuel or kerosene. Never use gasoline or other highly volatile materials to start a fire.
- m) Enforce "NO SMOKING" rules wherever there is fueling or storage of volatile materials. Post "NO SMOKING" signs.
- n) Turn off engines before refueling.
- o) Follow safe practices on cutting and welding.
- p) Follow safe procedures and use approved materials for the installation and use of temporary lighting and power.
- q) Use care in the placement, maintenance, and inspection of salamanders.
- r) Install fire protection on all heating units, including thermostatic controls. Never allow use of open fires or homemade oil fire pots for heating enclosures.
- s) When temporary electrical service is needed request that an electrician be made available to install service and outlets.

3. Control

- a) Provide fire extinguishers of the approved type at convenient locations. See that they are easily accessible, identifiable, properly inspected, and maintained.
- b) Instruct employees in the proper use of the correct firefighting equipment and methods.
- c) Instruct employees to call the nearest fire department immediately. Post fire department telephone numbers at each location.

FIRST AID

Facilities for medical and first aid treatment are to be provided for each job.

1. Medical – Find out the location of nearest hospital at the start of the job.
2. First Aid
 - a) Provide a first aid kit in each job office for treatment of minor injuries. Keep supplies replenished.
 - b) Provide small kits for foremen to be used only when work is done at a considerable distance from job office. Supplies to replenish these kits should be stocked in the job office.
 - c) Whenever possible, arrange to have at least one employee trained in first aid.
3. General
 - a) Establish a policy for transportation of injured workers to doctors or hospital.
 - b) Educate employees during supervisory and toolbox meetings in the basic procedures of handling the injured. For example:
 - 1) Do not move injured unless necessary to avoid further injury.
 - 2) Apply pressure at the point of serious bleeding rather than use a tourniquet.
 - 3) Use artificial respiration in cases of electrical shock, drowning, or asphyxiation.
 - 4) Do not give food or drink to the injured until the doctor arrives.
 - c) Stress the importance of reporting all injuries, no matter how slight, so that first aid and/or medical attention can be provided and the injury is a matter of record.

DISCIPLINE FOR NONCOMPLIANCE

Disciplinary actions will be taken against any employee who fails to observe any safety policy or procedure outlined in this manual. Any foreman, supervisor or official of management, as soon as he/she becomes aware of any such failure, shall ensure that the following is taken:

FIRST OFFENSE. A written report of the incident shall be made and placed in the employee's personnel file. The foreman will also give immediate on-the-job instruction to prevent further violations. The instruction will be part of the written report and be signed by both parties.

SECOND OFFENSE. The employee shall be immediately suspended from employment without pay for a period of one day. A written report of the incident shall be made and placed in the employee's personnel file. Upon his/her return to work, he must undergo additional formal training in the area of the violation before he/she is permitted to work so as to prevent injury to that employee or fellow co-workers.

THIRD OFFENSE. The employee shall be immediately terminated.

ACCIDENT INVESTIGATION

The objective of Road-Con Inc.'s safety program is to provide a safe and healthy working environment for all employees. As a part of this program the company has a responsibility to investigate all reported accidents regardless of severity. The intent of an accident investigation is to identify root causes and to eliminate any potential reoccurrence by implementing realistic corrective actions.

When an accident has occurred, employees involved in or witnessing the accident have a responsibility to report the incident to their immediate supervisor. Any requirement for medical treatment may be authorized by the field superintendent. In this circumstance appropriate actions shall be taken immediately.

The immediate supervisor receiving report of an accident is responsible to initiate the accident investigation. **Documentation of accidents shall be completed on the company approved accident report form within one business day.** The supervisor shall investigate how the accident occurred and immediate actions taken to correct the deficiency. The supervisor shall complete the identification, incident, and analysis sections of the accident report. Recommended controls or corrective actions should be completed jointly between the supervisor and or safety coordinator. The supervisor shall sign and date the report and provide it to the safety officer with a copy to the maintenance supervisor if the accident involves equipment, no later than one full working day following the accident. The safety officer shall utilize provided information to complete the OSHA 200 Log (if appropriate), the maintenance supervisor in conjunction with the safety officer will implement or recommend corrective actions. This information shall be entered on the accident report and signed by a member of management. The report shall be forwarded to the safety officer for follow up and report closure.

All accident reports shall be reviewed by the Senior Management to ensure corrective actions have been implemented and were effective. Following notation of this review and approval, the safety officer shall file the accident report as completed in the safety program files.

HAZARD COMMUNICATION PROGRAM

This program has been prepared to comply with requirements of the Federal OSHA Standard 1926.59 and to insure that information necessary for the safe use, handling, and storage of hazardous chemicals is provided for and made available to employees.

This program includes guidelines on identification of chemical hazards and the preparation and proper use of container labels, placards, and other warning devices.

1. Chemical Inventory

- a) Road-Con Inc. maintains an inventory of all known chemicals in use on the work site. An inventory list is available from the project superintendent or project manager.
- b) Hazardous chemicals brought on to the work site by Road-Con Inc. will be included on the inventory list.
- c) All project superintendents will take inventory prior to the start of a new job. At that time he will check to make sure that he has all necessary Material Safety Data Sheets (MSDS), if not, he will make arrangements to procure them.

2. Container Labeling

- a) All chemicals will be stored in their original or approved containers with a proper label attached, except small quantities for immediate use. Any container not properly labeled should be given to the project superintendent for labeling or disposal.
- b) Workers may dispense chemicals from their original containers only for their immediate use. Any chemical remaining after work is completed must be returned to the project superintendent for proper handling.
- c) No unmarked containers are to be left in the work area unattended.
- d) Road-Con Inc. will rely on manufacturer applied labels whenever possible, and will insure that these labels are maintained. Containers that are not labeled, or on which the manufacturer's label has been removed, will be relabeled.
- e) Road-Con Inc. will insure that each container is labeled with the identity of the hazardous chemical contained and any appropriate hazard warnings.

3. Material Safety Data Sheets (MSDS)

- a) Employees working with a hazardous chemical may request a copy of the MSDS. Requests for an MSDS should be made to the project superintendent or the project manager.
- b) MSDS should be available on the site to provide immediate reference to chemical safety information.

- c) An emergency procedure to gain access to MSDS information will be established.
- d) The project superintendent will verify that all employees are aware of what an MSDS is.

4. Employee Training

Employees will be trained to work safely with the hazardous chemicals.

Training will include:

- a) Methods that may be used to detect the release of a hazardous chemical in the workplace.
- b) Physical and health hazards associated with chemicals.
- c) Protective measures to be taken.
- d) Safe work practices
- e) Emergency responses
- f) Use of personal protective equipment
- g) Information on the Hazard Communication Standard
 - 1) Labeling and Warning systems
 - 2) An explanation of Material Safety Data Sheets

5. Personal Protective Equipment (PPE)

- a) Required PPE is available from the project superintendent.
- b) Any employee found in violation of PPE requirements may be subject to disciplinary actions up to and including discharge.

6. Emergency Response

- a) Any incident of overexposure or spill of a hazardous chemical substance must be reported to the project superintendent at once.
- b) The foremen or project superintendent will be responsible for insuring that proper emergency response actions are taken in the event of a leak or spill.

7. Informing Employees

- a) Supervisors will inform employees of any special tasks that may arise which would involve possible exposure to hazardous chemicals.
- b) Review of safe work procedures and use of required PPE will be conducted prior to the start of such tasks. Where necessary, areas will be posted to indicate the nature of the hazard involved.

8. Informing Other Employers

- a) Other on-site employers are required to adhere to the provisions of the Hazard Communications Standard.
- b) Information on hazardous chemicals known to be present will be exchanged with other employers. Employers will be responsible for providing their employees with the necessary information.

- c) Other onsite employers will be provided with a copy of Road-Con Inc. hazard communication program.

9. Posting

Road-Con Inc. has posted information for employees at this job site on the Hazard Communication Standard. This information can be found in the project office trailer.

RECORD KEEPING

The company safety officer will be responsible for maintaining the OSHA Log 200 up-to-date at all times. This log will retain all required information. OSHA 200 Logs from the prior five calendar years as well as the current year will be maintained.

In addition, all inspection checklists, accident reports and first aid logs will be maintained by the safety officer and held along with the OSHA log for five years.

SAFETY MEETINGS

Safety meetings are an important part of the overall Safety Program. It is through these meetings that specific safety issues may be discussed and potential safety problems identified. Each department supervisor will hold weekly safety meetings.

The purpose of the Safety Meetings is to allow supervisors and employees to exchange information, discuss audit results, review new safety procedures, identify new chemicals introduced to the plan and introduce any required training programs.

Each employee shall sign an attendance sheet indicating that they were present for that meeting. The supervisor will prepare a brief outline of the items discussed and initial the attendance sheet. The outline and attendance sheets will be forwarded to the Safety Officer for filing.