

1.1 PURPOSE

- 1.1.1 The purpose of this policy is to help TERRY R PITT CONSTRUCTION employees identify, analyze, and apply control strategies to eliminate or reduce hazardous conditions and unsafe practices in the workplace.

1.2 METHODS

- 1.2.1 The following methods will be utilized to identify hazards on the jobsite:

1.2.1.1 Loss analysis of accident trends

1.2.1.2 Accident investigation

1.2.1.3 Employee observation

1.2.1.4 Employee suggestions

1.2.1.5 Pre-task plan

1.2.1.6 Regulatory requirements for our industry

1.2.1.7 Outside agencies such as the fire department and insurance carriers

1.2.1.8 Periodic safety inspections

- 1.2.2 TERRY R PITT CONSTRUCTION will have formal processes such as Job Safety Analysis (JSAs), Job Hazard Analysis (JHAs), Preliminary Hazard Assessments (PHAs), or other suitable means to identify potential hazards.

- 1.2.3 These procedures are representative only and are not exhaustive of all the measures and methods that will be implemented. As new hazards are identified or improved work procedures developed, they will be incorporated into the *Health, Safety, and Environmental Policies and Procedures*. The improvement process will be continuous and lessons learned will be incorporated into hazard controls in ways such as plan-do-check-act (PDCA) or other similar continuous improvement processes.

1.3 RISK CONTROLS AND METHODS TO IDENTIFY, ADDRESS, AND MITIGATE HAZARDS

- 1.3.1 Risk assessed hazards are complied with and addressed. They are mitigated through a dedicated assignment, appropriate documentation of completion, and implemented control methods, including engineering or administrative controls and PPE required on the jobsite hazard assessment in the site specific HSE plan. No work will begin before the jobsite assessment is completed. Additionally, no risk assessed as High (Intolerable) will be performed.

- 1.3.2 If an existing or potential hazard is identified during a hazard assessment and if reasonably practicable, TERRY R PITT CONSTRUCTION must eliminate or control a hazard through the use of engineering controls. If a hazard cannot be adequately controlled using engineering controls, TERRY R PITT CONSTRUCTION will use administrative controls that control the hazard to a level

as low as reasonably achievable. If the hazard cannot be adequately controlled using engineering and/or administrative controls, TERRY R PITT CONSTRUCTION will ensure that the appropriate PPE is used. TERRY R PITT CONSTRUCTION may use a combination of engineering controls, administrative controls, and PPE if the combination creates a greater level of worker safety.

- 1.3.3 TERRY R PITT CONSTRUCTION will include affected company employees actively in the hazard identification process and identified hazards will be reviewed with those company employees affected by the process.

1.4 RISK ASSESSMENT

- 1.4.1 Hazards are identified, then classified and ranked based on severity. Hazards are prioritized and addressed based on the probability and severity/risk associated with the task (See the risk analysis matrix outlining severity and probability).

RISK ASSESSMENT MATRIX

Consequences (C)	Likelihood (L)				
	Rare	Unlikely	Possible	Very Likely	Certain to Occur
Catastrophic	moderate	moderate	high	critical	critical
Major	low	moderate	moderate	high	critical
Moderate	low	moderate	moderate	moderate	high
Minor	very low	low	moderate	moderate	moderate
Insignificant	very low	very low	low	low	moderate

Consequences (C)	How Severely Could Someone Be Hurt?
Catastrophic	Death or permanent disability
Major	Serious injury, hospital treatment required
Moderate	Injury requiring medical treatment and some lost time
Minor	Minor injury, first aid only required
Insignificant	Injuries requiring no treatment or first aid
Likelihood (L)	How Likely Are the Consequences?
Certain to Occur	Expected to occur in most circumstances
Very Likely	Will probably occur in most circumstances
Possible	Might occur occasionally
Unlikely	Could happen some time
Rare	May happen only in exceptional circumstances

Risk Level Rating	Action Required
Critical	IMMEDIATE ACTION NEEDED. Access to the hazard should be restricted until the risk can be lowered to an acceptable level. Short term action may be required to lower the risk level and then medium and long term plans to control the risk to as low as reasonably practicable using the hierarchy of control.
High	Action needed quickly (within 1-2 days). The task should not proceed unless the risk is assessed and control options selected based on the hierarchy of control.
Moderate	Action required this week to eliminate or minimize the risk using the hierarchy of control.
Low	Action required within a reasonable timeframe (2-4 weeks) to eliminate or minimize the risk using the hierarchy of control.
Very Low	Risk to be eliminated or lowered when possible using the hierarchy of control.

1.5 LOSS ANALYSIS

- 1.5.1 Periodic loss analyses will be conducted by the safety program administrator. These will help identify areas of concern and potential job hazards. The results of these analyses will be communicated to management, supervision, and employees through safety meetings and other appropriate means.

1.6 ACCIDENT INVESTIGATIONS

- 1.6.1 All accidents and injuries will be investigated in accordance with the guidelines contained in this program. Accident investigations will focus on all causal factors and corrective actions including the identification and correction of hazards that may have contributed to the accident.

1.7 EMPLOYEE OBSERVATION

- 1.7.1 Supervisors and foremen will be continually observing employees for unsafe actions and taking corrective action, as necessary.

1.8 EMPLOYEE SUGGESTIONS

- 1.8.1 Employees and subcontractors are encouraged to be actively involved in the hazard identification process. Hazards are reviewed with all employees concerned. TERRY R PITT CONSTRUCTION will provide tools to involve workers and their elected representatives in the development of the worker safety and health program goals, objectives, and performance measures and in the identification and control of hazards in the workplace.
- 1.8.2 Employees are encouraged to report any hazard they observe to their supervisor. No employee is to ever be disciplined or discharged for reporting any workplace hazard or unsafe condition. However, employees who do NOT report potential hazards or unsafe conditions that they are aware of will be subject to disciplinary action.

1.9 PRE-TASK PLAN

- 1.9.1 A pre-task plan will be used for all jobs. The pre-task plan is a process where the hazards associated with each step of a job are identified and control measures are put in place to lower the risk to personnel, property, and the environment.
- 1.9.2 A pre-task plan is developed and implemented for each identified operation and task and is required by TERRY R PITT CONSTRUCTION's safety and environmental policies and practices.
- 1.9.3 This is a list of potential risks. A pre-task plan will be used in the initial preparation or for validation of a procedure. Preparation of a pre-task plan will also lead to a procedure being updated or changed to enhance safety and the protection of the environment.
- 1.9.4 A pre-task plan must be maintained at the jobsite and readily accessible to employees.
- 1.9.5 Assemble group that will perform the assessment.
- 1.9.6 Break the job down into the primary steps or operations that need to be completed.
- 1.9.7 Evaluate the specific steps and tasks for potential hazards.
- 1.9.8 Evaluate the surrounding area and work environment for hazards resulting from conditions.
- 1.9.9 Review the hazard checklist for prompt identification of other possible hazards.
- 1.9.10 Identify and list possible job hazards.
- 1.9.11 Develop recommendations for hazard management including risk reduction or elimination.
- 1.9.12 Review other pre-task plan results for suggestions, ideas, or direction.
- 1.9.13 Determine priorities for hazard reduction or elimination in order of preference.
- 1.9.14 Develop engineering controls
- 1.9.15 Develop administrative controls
- 1.9.16 Consider additional personal protective equipment
- 1.9.17 Record the information using the pre-task plan form.
- 1.9.18 Verify pre-task plan is adequate for job to be performed.
- 1.9.19 Include on the pre-task plan the signatures/names of those who participated in the development of the pre-task plan.
- 1.9.20 Review the pre-task plan after completion of the job.
- 1.9.21 Revise the pre-task plan to reflect changes that may not have been considered in the original pre-task plan.

1.9.22 File completed pre-task plan in location where individuals and the work group can access them.

1.10 REGULATORY REQUIREMENTS

1.10.1 All industries are subject to government regulations relating to safety. Copies of pertinent regulations can be obtained from the safety committee.

1.11 OUTSIDE AGENCIES

1.11.1 Several organizations may assist in identifying hazards in TERRY R PITT CONSTRUCTION's workplace. These include safety officers from other contractors, insurance carrier safety and health consultants, private industry consultants, the fire department, and state OSHA consultants.

1.12 PERIODIC SAFETY INSPECTIONS

1.12.1 Periodic safety inspections ensure that physical and mechanical hazards are under control and identify situations that may become potentially hazardous. Inspections will include a review of the work habits of employees in all work areas. These inspections will be conducted by the supervisor, manager, program administrator, or other designated individual.

1.12.2 Periodic safety inspections will be conducted:

1.12.2.1 When new substances, process, procedures, or equipment are used

1.12.2.2 When new or previously unrecognized hazards are identified

1.12.2.3 Periodically by the supervisor

1.12.2.4 Periodically by the safety program administrator

1.12.3 These inspections will focus on both unsafe employee actions as well as unsafe conditions. The following is a partial list of items to be checked:

1.12.3.1 Proper use, condition, maintenance, and grounding of all electrically operated equipment

1.12.3.2 Proper use, condition, and maintenance of safeguards for all power-driven equipment

1.12.3.3 Compliance with the company safety manual

1.12.3.4 Housekeeping and personal protective equipment

1.12.3.5 Hazardous materials

1.12.3.6 Proper material storage

1.12.3.7 Provision of first aid equipment and emergency medical services

1.12.4 Any and all hazards identified will be corrected as soon as practical in accordance with the company hazard correction policy.

- 1.12.5 If imminent or life-threatening hazards are identified that cannot be immediately corrected, all workers must be removed from the area, except those with special training required to correct the hazard, who will be provided necessary safeguards.
- 1.12.6 The hazard identification process should be used for routine and non-routine activities as well as new processes, when changes in operation, products, or services occur, when necessary to protect the work force, safeguard the environment, and to protect company and hiring client assets, as applicable.

1.13 DOCUMENTATION OF INSPECTIONS

- 1.13.1 Safety inspections will be documented to include the following:
 - 1.13.1.1 Date on which the inspection was performed.
 - 1.13.1.2 The name and title of person who performed the inspection.
 - 1.13.1.3 Any hazardous conditions noted or discovered and the steps or procedures taken to correct them.
 - 1.13.1.4 Signature of the person who performed the inspection.
 - 1.13.1.5 One copy of the completed form should be sent to the office. All reports will be kept on file for a minimum of two years.

1.14 TRAINING

- 1.14.1 Workers are trained in the hazard identification processes and the hierarchies of control used to control hazards, including engineering, administrative, and personal protective equipment controls.
- 1.14.2 Training includes the proper use and care of PPE.
- 1.14.3 Training will include instruction in the proper selection and use of personal protective equipment (PPE), regarding both hazards under evaluation and also as may be required for abatement or mitigation activities.
- 1.14.4 Individual training will be documented in writing with: date, time, and place of training, the names of personnel trained, the name of the person(s) presenting the training, and a copy of the training material.
- 1.14.5 Training documentation will be on file in accordance with TERRY R PITT CONSTRUCTION'S recordkeeping procedures.