

1.1 INTRODUCTION

1.1.1 Training is one of the most important components within TERRY R PITT CONSTRUCTION's safety management system. It gives employees an opportunity to learn their jobs properly, bring new ideas into the workplace, reinforce existing ideas and practices, and it helps to put TERRY R PITT CONSTRUCTION's Safety and Health Program into action. TERRY R PITT CONSTRUCTION employees will benefit from safety and health training through fewer workplace injuries and illnesses, reduced stress, and higher morale. Productivity, profits, and competitiveness will increase as production costs per unit, turnover, and workers' compensation rates lower.

1.2 MANAGEMENT COMMITMENT

1.2.1 TERRY R PITT CONSTRUCTION will provide the necessary funds and scheduling time to ensure effective safety and health training is provided. This commitment will include paid work time for training and training in the language that the worker understands. Both management and employees will be involved in developing the program.

1.2.2 To carry out their safety responsibilities most effectively, all employees must understand:

1.2.2.1 Their role in the program

1.2.2.2 The hazards and potential hazards that need to be prevented or controlled

1.2.2.3 The ways to protect themselves and others

1.2.3 TERRY R PITT CONSTRUCTION will achieve these goals by:

1.2.3.1 Educating everyone on the natural and system consequences of their actions

1.2.3.2 Educating all managers, supervisors, and employees on their safety management system responsibilities

1.2.3.3 Educating all employees about the specific hazards and control measures in their workplace

1.2.3.4 Training all employees on hazard identification, analysis, reporting, and control procedures

1.2.3.5 Training all employees on safe work procedures and practices

1.2.4 TERRY R PITT CONSTRUCTION's training program will focus on health and safety concerns that determine the best way to deal with a particular hazard. When a hazard is identified, we will first try to remove it entirely. If that is not feasible, we will then train workers to protect themselves, if necessary, against the remaining hazard(s). Once we have decided that a safety or health

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problem can best be addressed by training (or by another method combined with training), we will follow up by developing specific training goals based on those needs.

1.2.5 Employees

1.2.5.1 At a minimum, employees must know the general safety and health rules of the worksite, specific site hazards and the safe work practices needed to help control exposure, and the individual's role in all types of emergency situations. TERRY R PITT CONSTRUCTION will ensure all employees understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards.

1.2.5.2 TERRY R PITT CONSTRUCTION will commit available resources to ensure employees receive safety and health training during the circumstances below.

1.2.5.2.1 Whenever a person is hired -- general safety orientation, including an overview of company safety rules, and why those rules must be followed

1.2.5.2.2 Whenever an employee is given a new job assignment -- during formal classroom training, and again, when the supervisor provides specific task training. It is extremely important that supervisors emphasize safety during initial task assignment

1.2.5.2.3 Whenever new work procedures are begun -- during formal classroom training and supervisor on-the-job training

1.2.5.2.4 Whenever new equipment is installed -- if new hazards are introduced

1.2.5.2.5 Whenever new substances are used -- hazard communication program may apply

1.2.5.2.6 The bottom line -- train safety whenever a new hazard is introduced to the employee

1.2.5.3 Employees must know they are responsible for complying with all company safety rules, and that most accidents will be prevented by their safe work practices. They must be very familiar with any personal protective equipment required for their jobs. They must know what to do in case of emergencies. Each employee needs to understand that they are not expected to start working a new assignment until they have been properly trained. If a job appears to be unsafe, they will report the situation to their supervisor.

1.2.6 Supervisors

1.2.6.1 Supervisors will be given special training to help them in their leadership role. They will be taught to look for hidden hazards in the work under their supervision, insist on

the maintenance of the physical protection in their areas, and reinforce employee hazard training through performance feedback and consistent enforcement, when necessary. TERRY R PITT CONSTRUCTION will commit necessary resources to ensure supervisors understand the responsibilities below and the reasons for them:

- 1.2.6.1.1 Detecting and correcting hazards in their work areas before they result in injuries or illnesses
- 1.2.6.1.2 Providing physical resources and psychosocial support that promote safe work
- 1.2.6.1.3 Providing performance feedback and effective recognition and discipline techniques
- 1.2.6.1.4 Conducting on-the-job training

1.2.6.2 Supervisors are considered the primary safety trainers. All supervisors will complete train-the-trainer classes to learn training techniques and how to test employee knowledge and skills. They will also receive training on how to apply fair and consistent recognition and discipline. Supervisor training may be provided by the supervisor's immediate manager, by the Safety Department, or by outside resources.

1.2.7 Managers

1.2.7.1 All line managers must understand their responsibilities within the Safety and Health Program. This may require classroom training and other forms of communication. Formal classroom training may not be necessary. The subject can be covered periodically as a part of regular management meetings.

1.2.7.2 Managers will be trained in the following subject areas:

- 1.2.7.2.1 The elements of the safety management system and the positive impact the various processes within the system can have on corporate objectives
- 1.2.7.2.2 Their responsibility to communicate the Safety and Health Program goals and objectives to their employees
- 1.2.7.2.3 Their role that includes making clear assignments of Safety and Health Program responsibilities, providing authority and resources to carry out assigned tasks, and holding subordinate managers and supervisors accountable
- 1.2.7.2.4 Actively requiring compliance with mandatory Safety and Health Program policies and rules and encouraging employee involvement in discretionary safety activities such as making suggestions and participation in the safety committee

- 1.2.7.3 Training will emphasize the importance of managers visibly showing their commitment to the safety and health program. They will be expected to set a good example by scrupulously following all the safety and health rules themselves.

1.3 PERSONAL PROTECTIVE EQUIPMENT (PPE)

- 1.3.1 Workers needing to wear personal protective equipment (PPE) and persons working in high-risk situations will need special training. Supervisors and workers alike must be taught the proper selection, use, and maintenance of PPE. Since PPE sometimes can be cumbersome, employees may need to be motivated to wear it in every situation where protection is necessary. Therefore, training will begin with a clear explanation of why the equipment is necessary, how its use will benefit the wearer, and what its limitations are.
- 1.3.2 TERRY R PITT CONSTRUCTION will remind employees of TERRY R PITT CONSTRUCTION's desire to protect them and of efforts not only to eliminate and reduce the hazards, but also to provide suitable PPE where needed, at no cost to the employee. Individual employees will become familiar with the PPE they are being asked to wear. This is done by handling it and putting it on.
- 1.3.3 Training will consist of showing employees how to put the equipment on, how to wear it properly, how to test for proper fit, and how to maintain it. Proper fit is essential if the equipment is to provide the intended protection. TERRY R PITT CONSTRUCTION will conduct periodic exercises in finding, donning, and properly using emergency personal protective equipment and devices.

1.4 VEHICULAR SAFETY

- 1.4.1 All workers operating a motor vehicle on the job (on or off premises) will be trained in safe vehicle operation, safe loading and unloading practices, safe speed in relation to varying conditions, and proper vehicle maintenance. TERRY R PITT CONSTRUCTION will emphasize, in the strongest possible terms, the benefits of safe driving and the potentially fatal consequences of unsafe practices.

1.5 EMERGENCY RESPONSE

- 1.5.1 TERRY R PITT CONSTRUCTION will train employees to respond to emergency situations. Every employee at every worksite will understand:
 - 1.5.1.1 Emergency telephone numbers and who may use them
 - 1.5.1.2 Emergency exits and how they are marked
 - 1.5.1.3 Evacuation routes
 - 1.5.1.4 Signals that alert employees to the need to evacuate.

1.6 PERIODIC SAFETY AND HEALTH TRAINING

1.6.1 At some worksites, complex work practices are necessary to control hazards. Elsewhere, occupational injuries and illness are common. At such sites, TERRY R PITT CONSTRUCTION will ensure that employees receive periodic safety and health training to refresh their memories and to teach new methods of control.

1.6.2 New training will also be conducted as necessary when OSHA standards change or when new standards are issued. Where the work situation changes rapidly, weekly meetings will be conducted, as needed. These meetings will remind workers of the upcoming week's tasks, the environmental changes that may affect them, and the procedures they may need to protect themselves and others.

1.6.3 Identifying Types of Training

1.6.3.1 Specific hazards that employees need to know about should be identified through total site safety managers and job hazard analyses. Accident and injury records may reveal additional hazards and needs for training. Near-miss reports, maintenance requests, and employee suggestions may also uncover other hazards requiring employee training.

1.6.4 Monitoring the Training Program

1.6.4.1 Monitoring the employee's progress through the developmental period is critical to ensure success of the training program. Monitoring provides information to the supervisor regarding the benefits and effectiveness of the training received. In addition, it provides information on the ability of the employee to achieve training goals and objectives. Both the employee's supervisor and training staff play major roles in the monitoring process. To ensure adequate monitoring of the safety training program, the actions below must occur.

1.6.4.1.1 The supervisor will ensure that each employee has completed the necessary prerequisites before the start of work.

1.6.4.1.2 The supervisor will review the employee's performance of task assignments.

1.6.4.1.3 The supervisor will conduct a review with the new-hire employee following each required training activity. This review provides the supervisor with information on the progress of the employee and can assist in identifying areas requiring further training.

1.6.4.1.4 When the supervisor determines that the new-hire employee has sufficient experience to successfully complete a task, the OJT review may be discontinued.

1.6.4.1.5 The supervisor and employee will complete training documentation.

1.6.5 Safety and Health Training Program Evaluation

1.6.5.1 An evaluation of the effectiveness of the training program will be conducted periodically. Staff from the training department will interview managers, supervisors, and employees who have participated in the program to determine the effectiveness of the training, and to obtain suggestions for program improvement. Evaluation will help determine whether the training provided has achieved its goal of improving employee safety and performance. When carefully developed and carried out, the evaluation will highlight training program strengths and identify areas of weakness that need change or improvement.

1.6.5.2 Evaluation will include an analysis of employee attendance at training sessions. Training will not work for an employee who does not show up. Absenteeism can signal a problem with the worker, but it can also indicate a weakness in training content and presentation.

1.6.5.3 TERRY R PITT CONSTRUCTION will compare pre-and post-training injury and accident rates overall. The periods of time being compared must be long enough to allow significant differences to emerge if training has made a difference.

1.6.5.4 TERRY R PITT CONSTRUCTION will determine whether the training provided has achieved its goal of improving employee safety performance. Evaluation will highlight training program strengths and identify areas of weakness that need change or improvement.

1.6.5.5 The Safety Manager will evaluate training through the following methods:

1.6.5.5.1 Observing employee skills

1.6.5.5.2 Surveys and interviews to determine employee knowledge and attitudes about training

1.6.5.5.3 Reviewing the training plan and lesson plans

1.6.5.5.4 Comparing training conducted with hazards in the workplace

1.6.5.5.5 Reviewing training documents

1.6.5.5.6 Comparing pre-and post-training injury and accident rates.

1.6.5.6 If evaluation determines program improvement is necessary, the safety committee/coordinator will develop recommendations.

1.7 TRAINING AND ACCOUNTABILITY

- 1.7.1 TERRY R PITT CONSTRUCTION understands that training without accountability is ineffective. TERRY R PITT CONSTRUCTION's safety culture must support training. A culture of consequences is essential. To help make sure efforts in safety and health training are effective, TERRY R PITT CONSTRUCTION has developed methods to measure performance and administer consequences.
- 1.7.2 Supervisors and managers must understand that their first responsibility is to make sure they have met their obligations to their employees before considering disciplinary action.
- 1.7.3 Managers and safety staff will be educated on the elements (processes) within the safety accountability system. The safety committee will be trained on, and continually evaluate, TERRY R PITT CONSTRUCTION's safety accountability system. Training will focus on improving the Safety and Health Program whenever hazardous conditions and unsafe or inappropriate behaviors are detected.
- 1.7.4 Safety orientation will emphasize that compliance with safety policies, procedures, and rules, as outlined in the safety plan, are all conditions of employment. Discipline will be administered to help the employee increase desired behaviors and is not meant to punish. An explanation of the natural and system consequences of behavior/performance will be addressed in every safety training session.
- 1.7.5 Types of Training
- 1.7.5.1 Required rules-related training will be conducted according to guidelines detailed in OSHA Publication 2254. TERRY R PITT CONSTRUCTION will also make sure additional training is conducted as deemed appropriate. The Safety Manager will ensure the Safety and Health Program training is in full compliance with OSHA standards. General safety training will be conducted on the following levels:
- 1.7.5.1.1 General Safety Education: General safety information is communicated to employees.
- 1.7.5.1.2 Specific Safety Training: Specific safety information and instruction on performing safe procedures and practices. SKAs are measured/tested. Employees must meet established criteria for SKAs to successfully complete the course.
- 1.7.5.2 New Employee Orientation
- 1.7.5.2.1 The format and extent of orientation training will depend on the complexity of hazards and the work practices needed to control them. Orientation will include a combination of initial classroom and follow-up on-the-job training (OJT).
- 1.7.5.2.2 For some jobs, orientation may consist of a quick review of site safety and health rules, hazard communication training for the toxic substances

present at the site, training required by relevant OSHA standards, e.g. fire protection, lockout/tagout, etc., and a run-through of the job tasks. This training will be presented by the new employee's supervisor or delegated employee.

1.7.5.2.3 For larger tasks with more complex hazards and work practices to control them, orientation will be structured carefully. TERRY R PITT CONSTRUCTION will make sure that new employees start the job with a clear understanding of the hazards and how to protect themselves and others.

1.7.5.2.4 TERRY R PITT CONSTRUCTION will follow up supervisory training with a buddy system, where a worker with lengthy experience is assigned to watch over and coach a new worker, either for a set period of time or until it is determined that training is complete. Whether the orientation is brief or lengthy, the supervisor will make sure that before new employees begin the job, they receive instruction in responding to emergencies. All orientation training received will be properly documented.

Terry R. 1.7.5.3 On-the-Job Training (OJT)

1.7.5.3.1 OJT relates principles and theories to work skills that are then taught and applied in the work environment. OJT is designed to reinforce formal classroom training. All new-hire employees require training to perform their jobs effectively. In this regard, OJT is an essential supplement to formal classroom training.

1.7.5.3.2 OJT assignments may be provided concurrently with formal training to emphasize and complement material covered in formal training courses. Time allotted to accomplish OJT assignments should be compatible with the new-hire's current knowledge, skill, and experience levels. The employee's supervisor should assess the employee's ability to successfully complete OJT.

1.7.5.4 Contract workers

1.7.5.4.1 Will receive training to recognize TERRY R PITT CONSTRUCTION's specific workplace hazards or potential hazards.

1.7.5.5 Experienced workers

1.7.5.5.1 Will be trained if the installation of new equipment changes their job in any way, or if process changes create new hazards or increase previously existing hazards.

1.7.5.6 All workers

1.7.5.6.1 Will receive refresher training periodically to keep them prepared for emergencies and alert them to ongoing housekeeping problems.