



ACCIDENT PREVENTION PROGRAM (Section 2)

PURPOSE:

At our conception Wagner-Meinert, Inc. adopted a policy to provide a safe and healthy place to work with the prevention of accidents being our ultimate goal at all times. This tradition continues as we continue with our ongoing Safety Program.

SCOPE:

In order to maintain the safety standards desired by our organization, it is necessary to actively pursue an accident prevention program through all levels of our company. Training in hazard recognition and control is essential to prevent the occurrence of accidents. The following is a summary of the accident prevention program that is to be supported and maintained by all employees:

- 1.0 TRAINING AND EDUCATION**
- 2.0 OCCUPATIONAL SAFETY AND HEALTH ACT**
- 3.0 STATE OPERATED COMPLIANCE PROGRAMS**
- 4.0 RECORDS**
- 5.0 SUBCONTRACTOR COMPLIANCE**
- 6.0 SAFETY INSPECTIONS**
- 7.0 OSHA INSPECTIONS**
- 8.0 VARIANCES**

1.0 TRAINING AND EDUCATION

1.1. General

1.1.1 Training and education cannot be over-emphasized as a means of learning the safe approach to employee work effort, as well as what to do in case of an accident. Employee training programs should be designed to ensure that employees understand and are aware of the hazards to which they may be exposed and the proper methods for avoiding such hazards. Each new employee should be furnished information and literature covering the company safety policies, rules and procedures. Each new employee shall be required to complete a safety test. Those employees who fail to complete the test in a satisfactory manner shall not be allowed to work until such time as they have completed the test in a satisfactory manner.

1.1.2 All key employees are encouraged to participate in seminars, lectures, talks, first aid courses, etc. that are provided by State, federal and other agencies. Employees are also encouraged to participate in company sponsored seminars.

1.1.3 The Safety Director schedules training sessions and contacts individuals within the organization regarding their attendance. Each employee is encouraged to contact his immediate supervisor, should there be some training course or seminar that in his opinion would be helpful in developing safety awareness. Approval of attendance and other necessary arrangements are made through the Safety Committee.

1.2 Safety Meetings

1.2.1 It is imperative that communication related to safety be established between all levels of our company. We therefore strongly support safety meetings for all employees in our organization. We believe that the most successful safety meetings are brief and concise, given to small groups to identify a specific safety subject, explain safety rules, discuss necessary precautions and exchange comments. These meetings shall be conducted on a regular basis and should be given by the immediate supervisor of the employees.

1.3 Safety Materials

1.3.1 Safety poster, charts, report forms, booklets and other descriptive material that will help dispense safety information shall be used in all work areas. This material is generally distributed for posting and distribution on a periodic basis. However, all personnel are encouraged to contact the

Safety Director and request illustrative material that addresses problems specific to their particular situation. All service vehicles, gang boxes, and fabrication facilities shall have available a copy of the Wagner-Meinert, Inc. Safety manual.

1.3.2 In addition, job site safety meeting talks are done weekly. These are expected to be discussed on site in a weekly safety meeting. The job-site foreman is expected to serve as meeting leader. Every Wagner-Meinert, Inc. employee on the job-site is expected to attend. Sub-contractors working under the direction of Wagner-Meinert, Inc. are also expected to attend. All attendees must sign the outline to verify their attendance. It is the responsibility of the foreman to return the completed outline to the office.

1.4 Training Records

1.4.1 Records should be kept of all safety and health training. Records provide evidence of compliance with OSHA standards and can supply the answer to the question during accident investigations, "was the injured employee properly trained?."

2.0 OCCUPATIONAL SAFETY AND HEALTH ACT

2.1 The Williams-Steiger Occupational Safety and Health Act was signed into law on December 29, 1970. It requires that every employer engaged in business affecting commerce shall:

2.1.1 Furnish to each employee a place of employment free from recognized hazards that are causing or likely to cause death or serious physical harm.

2.1.2 Instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to the employees work environment to control or eliminate any hazards or other exposure to illness or injury.

2.1.3 Comply with occupational safety and health standards and rules, regulations and orders pursuant to the Act that are applicable to our actions and conduct. Violators of the law and regulations are subject to penalties.

2.1.4 All employees must comply with occupational safety and health standards and all rules, regulations and orders issued pursuant to this Act which are applicable to their actions and conduct.

2.1.5 Because of this law, and in order to maintain safe conditions on our construction projects. Each supervisor and each employee should become familiar with OSHA Regulations 29 CFR Part 1926, Safety and

Health Regulations for Construction with OSHA 29 CFR Part 1920, General Industry Safety and Health Regulations Identified as Applicable to Construction and IOSHA related publications.

- 2.1.6 The Safety Manager should provide a copy of these OSHA regulations for construction to all supervisory personnel, in the form of the MCAA Publication "A Mechanical Contractors' Guide to OSHA Regulations". OSHA Publication 1920 & 1026 revised are located in the Safety Directors office.
- 2.1.7 Employees are to be encouraged to contact their immediate superior for data and literature that will help them better understand employers responsibilities under the Act.
- 2.1.8 The foreman in charge of each job site is responsible for insuring that:
 - 2.1.8.1 The Federal (or State) OSHA Poster, Emergency Telephone Numbers, OSHA Form 300, and other notices required by OSHA are properly posted at the site.
 - 2.1.8.2 Ambulance and medical service has been arranged for employees at the site.
 - 2.1.8.3 A properly equipped first aid kit is at the job site, the kit is checked weekly, and expended items replaced. First aid kits are located in each gang box and service vehicle.

3.0 STATE OPERATED COMPLIANCE PROGRAMS

- 3.1 Certain states are now operating under approved State plans for occupational safety and health rather than the Federal OSHA program. These states may have adopted the existing Federal OSHA standards and procedures or may have developed their own. Indiana and Michigan have adopted state plans, IOSHA and MIOSHA respectively.
- 3.2 Where this firm is subject to State occupational safety and health plans (Indiana and Michigan), our safety policy and program will be based on State requirements. It is the responsibility of the Safety Committee to verify which OSHA, IOSHA regulations (Federal/State) apply to this company's operations.

4.0 RECORDS

- 4.1 It is company policy, as well as Federal law, that certain records associated with accidents experienced on our jobs be kept up-to-date and retained for a period of

five (5) years. The purpose of this record keeping requirement is to identify recurring accidents of a similar nature, thereby allowing for the development of corrective action to eliminate their possible causes. The following is a summary of these record requirements.

- 4.1.1 Accident investigating and reporting procedures are developed by the Safety Director. An accident report on appropriate forms must be prepared within forty-eight (48) hours after each reportable incident. Reportable incidents consist of fatalities, lost work day cases or nonfatal cases without lost work days but requiring medical treatment. These reports are to be transmitted to the proper authorities.
- 4.1.2 Depending on the hazard, there may be Federal/State requirements for maintaining records of exposure to hazardous/toxic materials. Check with the Safety Director for requirement.
- 4.1.3 Maintain the OSHA Log of all reportable occupational injuries and illnesses for each job location. In some cases, this log may be kept at a central location for jobs subject to common supervision. This involves posting the information from the initial accident report on a Master Log (OSHA Form 200) within six (6) work days after the accident has occurred. The form must be kept available for OSHA Compliance Safety and Health Officer review. The Summary Section of OSHA Form 200 must be posted at each job site by February 1st of the following year and remain in place for thirty (30) consecutive calendar days thereafter. See OSHA regulations 29 CFR Part 1904 "Recording and Reporting Occupational Injuries and Illnesses."

5.0 SUBCONTRACTOR COMPLIANCE

- 5.1 The concern for our fellow employees must be communicated to our Subcontractors working on our projects. It is imperative that we observe or Subcontractors' operations and where safety or health problems are noted, identify them to the Subcontracts, as well as to our Safety Manager.
- 5.2 All contracts awarded to subcontractors shall require that Federal and State laws concerning safety are observed by the Subcontractor. Failure to fulfill this requirement is a failure to meet the conditions of our contract. Safety on the project extends through all subcontractor operations, as on unsafe condition unattended generally encourages deficiencies in other areas.
- 5.3 The above instructions similarly apply to all other contractors on a job site. Call safety violations of other contractors to the attention of your supervisor. The supervisors, in turn, report the condition to the contractors and the company Safety Manager. All subcontractor equipment and operators (cranes etc.) shall demonstrate OSHA compliance, and insurance liability forms.

6.0 SAFETY INSPECTIONS

6.1 This company has a definite policy and procedures for conducting job site inspections as outlined in the "Worksite Hazard Analysis Program". The purpose of such inspections is to identify unsafe conditions or activities and to take appropriate corrective action to improve safety conditions and practices.

7.0 OSHA INSPECTIONS

7.1 The Safety Director is responsible for preparing procedures to be followed in the event of an OSHA inspection of a job site. The procedure shall include person(s) at the central office to be notified immediately when the OSHA Compliance Safety and Health Officer arrives at the site. (See "Guidelines For Action When The OSHA Inspector Arrives".)

7.2 The Safety Director is responsible to develop procedures for handling OSHA citations, penalties, abatement deadlines and, as applicable, contests of unjust citations/penalties.

8.0 VARIANCES

8.1 OSHA has established procedures for permitting temporary or permanent variances to certain standards when valid circumstances may preclude compliance. All supervisory personnel are to recommend to the Safety Committee any standards for which a variance may be needed. The Safety Committee will take appropriate action, following procedures of OSHA Regulations 29 CFR Part 1905. "Rules for Variances, Limitations, Variations, Tolerances and Exemptions under the Williams-Steiger Occupational Safety and Health Act of 1970"

CHANGE CONTROL:

All management system changes are reviewed, approved or disapproved by the Safety Committee.

This program was initially developed on September 11, 2000, replacing the former Accident Prevention Program entirely.

Revision No. 1 (September 11, 2000)
Revision or Review No. 2 (January 15, 2001)
Revision or Review No. 3 (January 10, 2002)
Revision or Review No. 4 (January 11, 2003)
Revision or Review No. 5 (January 15, 2004)
Revision or Review No. 6 (January 10, 2005)
Revision or Review No. 7 (January 3, 2006)

Revision or Review No. 7 (January 3, 2006)

PERSONNEL:

The Owners have the ultimate responsibility for the Accident Prevention Program. They have designated the Safety Director to manage the Accident Prevention Program .