

V2.0

Safety Program Manual



Base image courtesy
of Reggie Lavallee

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Engineers Construction, Inc.
V2.0

ECI Code of Conduct

- Strive to maintain a positive and professional image of ECI to our employees, our clients, vendors, subcontractors, and the public.
- Speak and act supportively of ECI, as a company, and of our workers.
- Be prompt – Start on Time (work, appointments, projects, etc.)
- Don't over-promise or under-deliver
- Respect the Property of Others
- Work to VOSHA, OSHA, FRA, & ECI safety standards
- Work in an environmentally conscientious manner.
- Drive safely, defensively, and courteously.
- Maintain cleanliness and condition of vehicles and equipment.
- Maintain respectful behavior whenever one is working, driving a company vehicle, or wearing the company logo. You are always representing this company.
- Strive for restraint, discretion, and integrity
- Maintain confidentiality of insider information learned about ECI or about our clients.
- Promote the CODE.

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Definitions and Abbreviations

Commercial Driver's License (CDL) – Is required to operate any combination of vehicles with a gross combination weight rating of 26,001 pounds or more.

Department of Transportation (DOT) – A federal Cabinet department of the U.S. government concerned with transportation.

Engineers Construction, Inc. (ECI) – The Employer / the Company

Hazardous Waste Operations and Emergency Response (HAZWOPER) – It is based on OSHA standard 1910.120 and it applies to workers involved in hazardous waste cleanup operations and emergency response to spills

Health and Safety Plan (HASP) - A plan for a workplace that is designed in accordance with the legislative requirements covering the roles and responsibilities of the staff and the emergency action plan.

Incident, safety – An unplanned or unprecedented event or occurrence resulting in a near-miss, personal injury (minor or catastrophic), ECI property damage, public or private property damage, or environmental impact

Jobsite Hazard Assessment (JHA) – Is a daily evaluation of a work place, or work activity, to identify the potential hazards that an employee may encounter while performing on the job. The evaluation is documented on the JHA form and signed by all participants.

Near miss – A type of incident that had the potential to cause personal injury, property damage, or environmental impact without actually causing personal injury, property damage, or environmental impact

Occupational Safety and Health Administration (OSHA) – U.S. federal agency established to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance.

Safe Work Practices (SWP) – ECI safe work practice are documented summaries related to a specific task containing content aimed at assisting employees with hazard recognition and control related to the specific task, and outlining applicable company expectations and regulatory requirements. SWPs are intended to act as standards for work performed throughout the entire company.

United States Department of Labor (USDOL) – Is a cabinet-level department of the U.S. government responsible for occupational safety, wage and hour standards, unemployment insurance benefits, reemployment services, and some economic statistics.

Vermont Occupational Safety and Health Administration (VOSHA) – A state agency of the Vermont Department of Labor to assure safe and healthful working conditions for working men and women by setting and enforcing standards and by providing training, outreach, education and assistance. For all intensives purposes VOSHA is equivalent to OSHA for work performed in the State of Vermont.

Section 1 – Safety Program Summary

1.1 ECI’s Safety Mission

“ECI strives to maintain a corporate culture of safe work practices to protect our workers, the public, and the environment.” – Kenneth Pidgeon PE, President of Engineers Construction

1.2 Purpose of the Safety Program Manual

The Safety Program at Engineers Construction, Inc. (ECI) is based on the corporate-wide initiative to develop and maintain a culture of safety through:

- Leadership
- Technical training
- Professional behavior
- Project planning
- Risk Assessment
- Standardized safety practices
- Strong communication, documentation, and attention to details.

The purpose of the Safety Program Manual (the Manual) is to document the particulars that make up the Program, creating a resource for employees to utilize while working with ECI.

1.3 ECI’s Fundamental Approach to Health and Safety

The Safety Program focuses heavily on the engineering aspect of safety, providing employees with technical skills and resources to aid in hazard recognition and hazard control. This builds off of the cultural aspect of the Safety Program, which is focused on promoting consistent and safe work practice and behavior across the Company and in accordance with the ECI Employee Code of Conduct. These focuses can be further generalized into two fundamental approaches to health and safety: Behavior Based Safety and Compliance Based Safety. Both of these safety approaches are equally important and complementary to a safe working culture.

Behavior Based Safety

Most incidents leading to personal injury or property damage involve behavioral issues. Frequently the root causes of such incidents, and the events leading up to them, can be pointed towards human-related factors. Examples of such factors or behaviors may include:

- Complacency – We often get fooled because the process worked thousands of times before without an incident. Be aware, stay ready, look for problems, and take corrective actions to maintain a safe working environment.

- Distractions - Keep your head in the game. Had an argument with your spouse or loved one this morning? Received spiteful comments from the boss? Thinking about the weekend? Whatever it is, if you can't stay focused on the task, then you won't have control over the work.
- Exhaustion, hung over, etc. – Do not put yourself in a situation that compromises the safety of yourself, your co-workers, or the public. Avoid excessive indulgences before a work day, get plenty of sleep, and take frequent breaks when performing monotonous work.
- Overconfidence and arrogance – Do not get blinded by your overconfidence. When we get good at a task it is easy to get overconfident and lose respect for the jobsite hazards that exist.

ECI takes a proactive approach to injury prevention that focuses on high-risk activities and behaviors that if not controlled properly, can likely lead to an incident. The Safety Program recognizes, formalizes, and establishes the recent evolution in culture and management practices along with several initiatives:

- Manage Human Behavior Aspects of Safety– Train our leaders to recognize, contain, and to better report problem behaviors. Respond quickly and firmly to behavior problems once identified. Include jobsite behavior for safety topics throughout the year. Provide better screening for signs of potential problem behaviors during job interviews.
- Develop and Maintain ECI Safety Culture – Frequently state ECI core mission statement and philosophy relative to safety. Make preplanning a core jobsite requirement. Publish weekly emails to develop ECI's culture and broadcast weekly safety focus throughout every jobsite.

Compliance Based Safety

Staying safe in the modern construction workplace is more complex than ever before. Many considerations are necessary to execute work in a safe and effective manner while complying with published regulations and safe working standards. In most cases these regulations and standards include:

- State and Federal Safety Regulations:
 - VDOL Vermont Occupational Safety & Health Association (VOSHA)
 - USDOL Occupational Safety & Health Association (OSHA)
 - USDOL Mine Safety & Health Administration (MSHA)
 - USDOT Federal Railroad Administration (FRA)
 - USDOT Pipeline & Hazardous Material Safety Administration (PHMSA)
 - USDOT Federal Motor Carrier Safety Administration (FMCSA)
- Building Codes & Standards:
 - American Association of State Highway and Transportation Officials (AASHTO)
 - International Building Code (IBC)
 - Americans with Disabilities Act (ADA) Standards for Accessible Design
 - National Electric Code (NEC)
 - Other applicable local and State Codes & Standards
- Employer Safety Manuals
- Client and Owner Safety Manuals
- Manufacture's Safety Data Sheets (SDS)

- Equipment and Vehicle Operating Manuals

The Safety Program Manual and all referenced documentation shall act as a tool to inform employees of all applicable safety requirements across all aspects of our work, why they exist, and how to properly comply with them. In cases where gaps exist or where differing requirements exist between standards or regulations, the Program promotes the use of jobsite risk assessments to identify the preferred practices which make the most logical sense and provide for the safest working environment possible given the specific hazards that are identified.

1.4 Obligations of the Employer

Providing a safe workplace which is managed and controlled in accordance with all applicable regulations and standards is an essential obligation of all Employers. ECI achieves this by providing:

- Education and training specific to an employee's role and assigned work tasks
- Supervision and counsel from experienced and trained working professionals
- Risk assessment tools
- Personal protective equipment (PPE)
- Hazardous condition measuring instruments
- Fit-for-purpose safety systems and equipment
- Compliance monitoring by dedicated Health and Safety staff
- Executive leadership
- A company-wide safety culture that includes:
 - An appreciation of engineering and science associated with our work and the safety practices
 - The use of risk assessments to identify hazards and implement proper controls
 - A sense of pride for quality work and safe work practices
 - The Code of Conduct items, particularly regarding safe driving, respectful behavior, and environmental conscientious work practices

In addition to worker safety, ECI has a duty to protect the public near and around the work. This is particularly important as many of ECI's projects and tasks take place within public rights-of-way.

Safety Program Assessment

Assessments of the Safety Program will be performed at least annually, with the support of internal leadership and third party organizations. The purpose of the assessment is to evaluate how effective the program is at removing workplace hazards and keeping our employees safe and incident-free. The assessment will also aim to close any gaps that might exist in the program as a result of changing in regulatory requirements and or changes in working conditions.

1.5 Obligations of the Employee

All ECI employees are provided with the following responsibilities with respect to the Safety Program:

- Acknowledge and understand the content within the Safety Program Manual
- Understand and follow all applicable health and safety policies and procedures
- Adhere to fit-for-duty physical and mental requirements
- Maintain licensure for operating motor vehicles and other equipment as required
- Proper use and maintenance of assigned equipment and personal protective gear
- Recognize hazards and implement adequate measures to control hazards through risk assessments
- Ask for assistance if uncertain about a specific hazard or potentially hazardous situation
- Look out for fellow workers and the public traveling through ECI jobsites
- Acknowledge and appreciate general engineering principals as they relate to personal safety
- Attend and participate in JHAs and Weekly Safety Meetings
- Report safety incidences in accordance with reporting procedures
- Comply with the ECI Substance Abuse Policy
- Follow the ECI Code of Conduct

All employees have the authority to stop work under the following conditions:

- If you see an unsafe act taking place or about to take place
- If you believe conditions are unsafe and not fit for the task(s) at hand
- If there is confusion with regards to the work plan

Employees are encouraged to speak up if they have a suggestion to make the jobsite or activity safer. When we share the responsibility in the workplace, everyone wins.

1.6 Subcontractor Obligations

Leadership and commitment to providing a safe work environment and teaching safe working behaviors extends beyond just ECI direct-hired employees. All subcontractors performing work for ECI are expected to comply with all health and safety systems put in place on the specific project, including compliance with any specialty regulatory requirements that may not otherwise apply to the work being performed directly by ECI. Training for subcontractor employees will be performed as required.

Other specific health and safety requirements, including performing task specific hazard assessments and attending ECI daily Jobsite Hazard Assessments, will be outlined in the contract between ECI and the subcontractor.

All subcontractors are required to carry their own insurance for the project, unless alternative circumstances are present. This will also be made clear in the contract between ECI and the subcontractor.

ECI Project Managers shall be responsible for assuring subcontracted entities are properly briefed on the project's expectation and requirements for health and safety, including required Hazard Assessment documentation. Appropriate language outlining project-specific subcontractor obligations shall be included in the subcontracts accordingly.

ECI Superintendents shall be responsible for assuring subcontractors adhere to all applicable health and safety requirements in the field including attending daily JHAs and following activity-specific protocols as outlined in either the project specific HASP or otherwise in ECI SWPs. Non-conformances shall be reported to the Project Manager immediately.

1.7 Corporate Health and Safety Team and Facilities

Health and Safety Team:

Safety Director

Responsibilities include:

- Continuously monitor the effectiveness of the Health and Safety Program
- Update the Program as required to maintain compliance with regulatory requirements
- Implement changes to the health and safety program
- Collect and organize corporate safety data for regulatory reporting, and for internal analyses
- Manage the ECI Substance Abuse Program
- Inspect and audit site-specific health and safety systems
- Manage the incident reporting program and conduct incident investigations as required
- Organize and / or conduct Health and Safety Training for all employees as required
- Prepare emergency response plans for individual projects as required
- Liaise with ECI's insurance providers if/when necessary
- Supervise the Safety Program Technician

Safety Program Technician

Responsibilities include:

- Managing the following items:
 - Hazardous Communication media distribution
 - Dig Safe permitting process
 - Health and Safety document control
 - Employee CDL Physicals and Fitness for Duty appointments
- Purchasing of health and safety tools, material and equipment
- Track and maintain health and safety tool and equipment inventory

Health and Safety Facilities and Equipment:

- Training Classroom – used for conducting safety training sessions and hosting company-wide Weekly Safety Meetings. Computer-led training space is also present.
- Tool Crib – used for storing and controlling the distribution of tools and health and safety materials and equipment, including fall protection systems, PPE, first-aid kits and spill-kits.

1.8 ECI Safety Committee

ECI's employees are the major stakeholder of the Safety Program, and the success of the Safety Program relies on the employee's participation. The ECI Safety Committee is established to bring the Employee's perspective to the process and to provide them the opportunity to constructively critique the Program, its administrators, and the corporate leadership.

The ECI Safety Committee's mission is to provide an independent on-going review of ECI's Safety Program from the employee's perspective. The goals are to promote personal health and job-site safety through leadership and collaboration with employees. The Committee includes a balanced mix of project managers, field supervisors, craft workers, drivers, and company administrators. Corporate Health and Safety Team meets with the Committee to report out on safety data, respond to safety questions, and to support the Committee to achieve their goals.

Committee Member positions are filled on a volunteer basis. The Chair position is assigned by ECI's corporate leadership. Committee members are replaced periodically with new members in order to diversify participation and encourage up-and-coming leaders in the company to get involved and help shape the future of health and safety at ECI.

The Chair reports findings, concerns and proposals raised by the Committee to ECI Corporate Leadership for review and implementation.

At a minimum, the Safety Committee meets four times a year.

Specific Responsibilities of the Safety Committee include:

- Promote the Safety Program and safety culture at ECI through leadership.
- Share and review feedback on the ECI Safety Program and the general health of the safety culture in the company.
- Review Incident root-cause trends and authorize the implementation of new accident-prevention measures where appropriate. It is not the intent that the Committee reviews all incidents but that certain incidents might be selected by the Chair that fit into the Committees overall mission to look at safe practices and behavior.
- Identify areas of the program that require improvement or updating.
- Establish safety-related goals and metrics for the year.
- Serve as an advisory board to the Employee Wellness Program.
- Review and comment on proposed updates to the Safety Program Manual.
- Develop and maintain ECI Safe Working Practices (SWP) policies and procedures

Contact your supervisor if you are interested in becoming a member of the Committee.

Section 2 – ECI Health and Safety Systems

2.1 Employee Management Systems

New Employee Orientation

Every new employee to ECI will attend a mandatory orientation which is designed to help familiarize all new hires with ECI's corporate culture and operations. Each new employee will attend four different training seminars during the orientation which includes:

- Safety – An overall review the ECI Safety Program, including the ECI Code of Conduct.
- Administrative - A review of the employee Handbook and filling out proper State and Federal documentation.
- Maintenance & Care of Equipment – Overview of responsibilities and expectation of the ECI Maintenance Program.
- Supervisor Meeting – A meeting to review employee responsibilities, ECI chain of command, conflict resolution, etc.

Employee Physical Examination & Health Assessment for Fitness for Duty

Physical examinations and health assessments help assure that employees are physically fit for duty and can safely perform all assigned tasks. The following is a summary of these requirements:

- **Pre-Employment Physical Examination and Health Assessment** – All potential employees shall possess a DOT Physical Card valid for a minimum of one year issued upon completion of a Pre-Employment Physical Examination and Health Assessment.
- **Renewal of DOT Physical Card** – All ECI employees will maintain a valid DOT Physical Card. The company medical provider will determine the length of the valid card per the overall health of the employee. It is the responsibility of the employee to maintain or work to a valid DOT Physical Card. Typically a DOT Physical Card is valid for one year. ECI will cover the cost of one DOT Physical Exam annually. The employee will be responsible for additional costs related to treatment, diagnosis, evaluation, and re-examinations as required.
- **Temporary Fitness for Duty** – In certain cases a Temporary Fitness for Duty authorization may be issued by our medical provider in lieu of a DOT Physical Card for a defined period of time. However, operating ECI motor vehicles or equipment is prohibited until the company medical provider issues a valid DOT Physical Card.
- **Compliance** – ECI Corporate Health and Safety will assist with scheduling, reporting DOT card to the State of Vermont, and maintaining an internal database for all ECI employees.

Employee Wellness Program

ECI is committed to providing its employees with opportunities to improve and/or maintain personal health and well-being beyond that which is required to perform work-related duties. It is ECI's belief that focusing on prevention and overall well-being will lead to long term benefits for the company and all its employees through areas such as increased productivity and fewer absences due to illness. Through collaboration with employees, health insurance providers, and other local businesses and organizations, wellness initiatives and programs are made available to help and encourage employees to live and maintain a happy and healthy lifestyle. Contact your supervisor for more information on what current programs and initiatives you may be eligible for.

Consequences of Safety Infractions

It is important for the entire Company to keep open and constructive communication when an employee is found not complying with or behaving to the expectations set forth in the ECI Safety Program, whether it is intentional or unintentional. In cases where an employee chooses to not comply with controls and safety protocols put in place, the situation will be handled as follows:

- First offense - Verbal Warning
- Second offense - Documented Verbal Warning (recorded in the Weekly Safety Report to management)
- Third Offense - Written Warning from the Vice President of Operations
- Fourth Offense – Employment termination

After each recorded offense, additional training will be provided to the employee so that he or she better understands which safety protocols were violated and how he or she can improve safe work behaviors and make better decisions while continuing to work with ECI. Identified safety infraction will be documented in a Corrective Action Report¹ and filed in the employee's personal folder. The key to this disciplinary process is for the employee to acknowledge the infraction and to embrace the safe practices expected for all employees. The Safety Director may recommend employment termination prior to the fourth offense if the employee fails to demonstrate this expectation.

2.2 Safety Communication Systems

Safety Focus of the Week

Each week the Corporate Health and Safety Team identify an applicable topic to discuss and share related health and safety information. An email containing a summary of the topic and discussion is distributed every Thursday evening to all employees and various corporate friends and partners. The email is prepared using Constant Contact and mirrors content posted on the ECI Safety Blog and presented in the Weekly Safety Meeting.

All employees with a company email address will receive the weekly email. Employees without a company email address may provide their personal email addresses if they wish to be a part of the email

¹ See Appendix 2 Corrective Action Report

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distribution. Furthermore, by providing their personal email addresses, the employees are thereby granting ECI permission to send the email. Employees should submit any email address changes to the ECI Accounting Department for distribution to Corporate Health and Safety.

ECI Safety Blog

The Safety Focus of the Week is publicly shared as a blog on the ECI website:
www.ecivt.com/safety/safety-blog/

The blog contains safety-related information relative to the week's safety focus and related side-topics, and other thoughts and comments intended to inspire further discussion on the topic. Content from the safety blog can also be downloaded through the website.

The safety blog can also serve as a backup discussion for the weekly Friday morning meeting for situations where the scheduled presentation cannot occur (such as: presenter suddenly unavailable, presentation media fails, etc.).

Weekly Safety Meeting

Each week the Corporate Health and Safety team hosts a Safety Meeting on various health and safety-related topics (often mirroring the Safety Focus of the Week). The overall goal of the Meeting is to raise awareness to common hazards we see around the workplace and describe ways to control the hazards through safe work practice and/or protect employees through personal protective equipment.

Attendance at the Weekly Safety Meeting is mandatory. Employees can attend in person or tune in to the meeting via ECI live broadcasts through the internet. A link to the broadcast is included in the weekly email.

Weekly Safety Report

Each Friday a Weekly Safety Report² is prepared by the Safety Director and distributed to corporate leadership and project managers. The report is primarily focused on health and safety related events taken place during the week, including the following:

- Reported Near Misses
- Reported Personal Injury or Illness Incidents
- Reported Utility Incidents
- Reported Vehicle Incidents
- Reported Property Damage
- Reported Vehicle Violations
- Site Safety Inspection performed during the week
- Health and Safety Trends
- Other applicable comments

² See Appendix 3 Weekly Safety Report

E-C-i SAFE Mobile Phone App

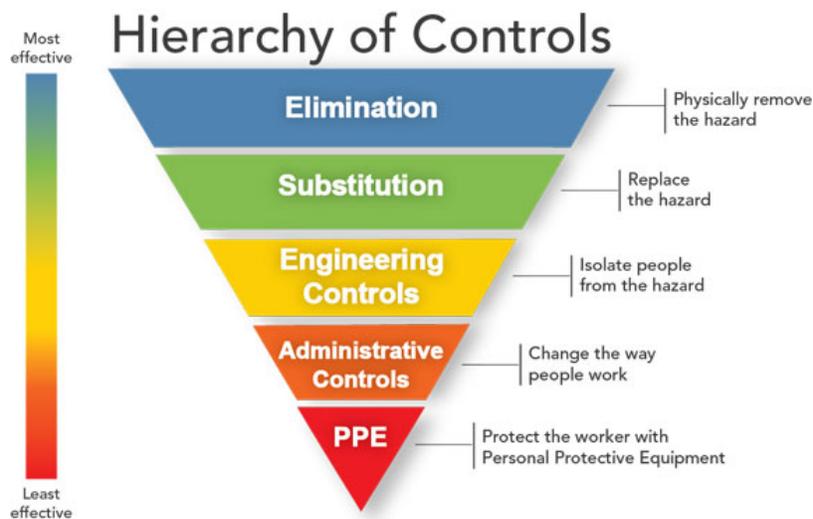
Coming soon!

2.3 Jobsite Safety Planning Systems

Jobsite Hazard Assessment

The purpose of a Jobsite Hazard Assessment (JHA) is to inform employees of potential hazards and provide an opportunity for hazards to be controlled before the work begins.

The first step in the JHA is hazard recognition. The next step is to identify the most effective and efficient ways to control the recognized hazards. ECI uses the industry-accepted system called the Hierarchy of Controls to aid in this process.



***Image taken from the National Institute for Occupational Safety and Health (NIOSH)*

Each morning, or prior to the start of a new project, job or task, a JHA shall be performed by the respective crew(s) scheduled to perform the work. The crew leader shall lead the assessment / discussion and will record the details of the assessment on the JHA form³. However, the JHA should be an open and constructive activity where all participating employees can collaborate and properly plan the work together. Signatures on the forms reflect employee participation in the JHA and understanding of the recognized hazards and the controls that are, or will be, put in place to eliminate or mitigate the hazards.

Completed JHA forms shall be submitted to the respective Project Manager at the end of each week.

Further discussions and training on the Hierarchy of Controls and the JHA process take place regularly during the Weekly Safety Meetings.

³ See Appendix 4 Jobsite Hazard Assessment Form

Site Specific Health and Safety Plans (HASP)

Some projects will contractually require a Site-Specific Health and Safety Plan (HASP). The Safety Director, Project Manager, or Superintendent may also recommend a HASP for certain other projects with a long duration (6-months +), complex nature, or HAZWOPER aspect.

The HASP shall be developed by the project team to aid in documenting and informing all project members of the specific hazards and corresponding controls put in place on the project. This HASP will, at a minimum, contain the following project-specific content:

- Project Management Safety Policy Statement
- Site specific safety requirements (i.e. Client requirements)
- Project Team Roles and Responsibilities
- Site logistics Plan
- Site and activity specific hazard assessment
- Required safety certification, authorization and/or training
- Emergency Response Plan
- Incident reporting plan
- Project Team Contact Information

ECI Project Managers shall be responsible for developing the Site-Specific HASP at the beginning of the project and are expected to collaborate with the ECI crew(s) scheduled to perform the work, the Client, and any other applicable entities such as subcontractors or local authorities (e.g. Police, Fire Department, etc.).

2.4 Safety Surveillance and Inspections

Safety Surveillance

It is critical to the success of the Safety Program that we all watch out for each other and continuously monitor the activities of those working around us in order to promote good behavior and proper compliance. Safety surveillance is the act of:

- Observing the surrounding environment and checking for hazards
- Verifying whether or not best behaviors are being practiced by those working nearby
- Verifying that adequate hazard control systems are in place and functioning properly
- Verifying that proper compliance is being maintained
- Making an active effort to correct unsafe conditions

Safety surveillance is not performed according to a set schedule or frequency and does not require any formal documentation. It is performed continuously by all project team members through engagement and good communication. By actively and continuously watching out for each other we are all more likely to go home safe at the end of the day.

Safety Inspections

Safety inspections, unlike safety surveillance, is a more formal act of checking for defects in a safety system, measuring and recording identified defects, and sharing the feedback for the purpose of corrective action, lessons learned, and increasing general awareness.

Corporate Health and Safety Officers, and other assigned employees, conduct periodic site safety inspections⁴ on all ECI projects. The purpose of the inspection process is to assess the implementation and effectiveness of all planned health and safety systems for the specific project and ongoing work activities. Inspectors are encouraged to perform inspections with the respective jobsite supervisor so that any deficiencies can be discussed and corrected as they are discovered. All noted actions are expected to be corrected as quickly as possible and will be documented on the Weekly Safety Report for the purposes of tracking trends and sharing lessons learned.

2.5 Incident Response and Management

Incident Categories and First Response Requirements

In the event an incident occurs resulting in personal injury, vehicle collision, utility damage or other property damage, it is critical to stabilize the situation and then take further action as necessary. The following describes the categorization used when classifying an incident and the preferred first response protocol is for each:

- **Serious Personal Injury** – The injury includes loss of consciousness, uncontrolled bleeding, or other severe injury.
First Response: Call 911 (unless the project-specific emergency response plan describes otherwise) to seek emergency medical assistance. Assist with any first aid measures until emergency personnel arrive. Proceed to follow the internal reporting process⁵.
- **Personal Injury Beyond First Aid** – The injury does not require emergency medical assistance; however medical attention is still needed.
First Response: Perform on site first-aid as needed and proceed to transport the employee to a Preferred Personal Injury Health Care Provider⁶. Proceed to follow the internal reporting process.
- **Minor Personal Injury** – The injury is minor in nature and requires minimal first-aid (e.g. small cuts, bruises, etc.).
First Response: Perform on-site first-aid as required. Proceed to follow the internal reporting process.

⁴ See Appendix 5 Site Safety Inspection Form

⁵ See Appendix 6 Incident Reporting Process

⁶ See Appendix 7 Preferred Personal Health Care Providers

- **Single Vehicle Incident** – The incident involves any company vehicle or equipment or an employee’s personal vehicle during working hours.
First Response: Move the vehicle out of harm’s way if safe to do so. Proceed to follow the internal reporting process.
- **Vehicle Incident involving two or more vehicles** – The incident involves one or more vehicles AND any company vehicle (or equipment) or an employee’s personal vehicle during working hours.
First Response: Move the vehicle out of harm’s way if safe to do so. Proceed to follow the internal reporting process, including exchanging of vehicle insurance and personal contact information with the other drivers and the local / State Police Department as required.
- **Utility Strike with a pressurized Gas Line** – The incident involves damage to a pressurized gas line (e.g. natural gas, propane, etc.).
First Response: Contact the utility owner immediately and proceed to follow the internal reporting process. If the gas line is leaking, move a safe distance away from the area, call 911, and notify and evaluate any potentially affected residences and businesses. Proceed to follow additional response protocol as described in ECI Safe Work Practices.
- **Utility Strike with an Electric powerline** – The incident involves damage to a high-voltage electric utility.
First Response: Move a safe distance away from the utility, contact the utility owner and keep the public away from the hazards while waiting for emergency response personnel to arrive. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.
- **Utility Strike with a Communication Line** – The incident involves damage to a telecommunications utility such as telephone or fiber-optic lines.
First Response: Notify the utility owner. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.
- **Utility Strike with a Water Line** – The incident involves damage or rupture to a pressurized water line.
First Response: Remove all workers from the trench and, if possible, turn off the water source. Notify the utility owner. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.
- **Utility Strike with a sewer Line** - The incident involves damage or rupture of a storm or sanitary sewer line.

First Response: Take initial measures to control sewer flow if safe to do so. Notify the utility owner. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.

- **Environmental Release** – The incident involves the release of oils, chemicals, or other hazardous materials into the environment.

First Response: Stop the release if safe to do so and control additional spreading of the material by using earth berms, oil booms, spill kits or other appropriate means. Notify the Client and/or facility owner. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.

- **Property Damage** – The incident involves damage to ECI, public or private property not otherwise covered under another category. Examples include damage to civil structures, private property, buildings, tools & equipment, etc.

First Response: Contact property owner and take pictures if able to do so. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.

- **Vandalism and Theft** – The incident involves damage to ECI owned property, including infrastructure being built as part of a project, or theft of ECI owned tools, equipment or materials.

First Response: Take pictures as appropriate. Proceed to follow the internal reporting process and response protocol as described in ECI Safe Work Practices.

Internal Reporting

All incidents shall be reported to the employee's supervisor, despite how minor they may be. The incident, as and where applicable, will be documented on the day of the incident by completing the appropriate Incident Investigation Form⁷. The Form is used as the primary tool for documenting incidents as well as investigating the incidents further to determine root cause. The information collected as part of the investigation will help further develop safe work practices and identify potential tool, equipment, PPE or employee training needs.

Refer to the Incident Reporting SWP for additional information related to each of the respective types of incidents.

External Reporting

Depending on the type of incident, the location of the incident, and the magnitude of the incident, reporting to entities outside of the ECI organization can be critical to assure proper notifications and compliance with regulatory reporting requirements.

The following list identifies, in general, the entities that may need to be informed in case of an incident:

⁷ See Appendix 8 Incident Investigation Form

- OSHA / VOSHA
- ECI Workers Compensation provider
- ECI Insurance provider
- Department of Motor Vehicles (DMV)
- Environmental agencies (e.g. Agency of Natural Resources)

The external notifications are determined and assigned by the Safety Director and Corporate Leadership.

Return to Work Program

Where possible and practical, ECI will provide temporary transitional duties that meet any restriction of an employee recovering from an injury. Whenever possible, attempts will be made to allow the employee to remain in his or her original classification or job function with restrictions. ECI maintains the right to assign employees on restricted duty to any job or any function they are capable of performing. Once the employee is medically clear to return to full duty without restriction the employee will be reassigned to their original job duties.

Section 3 – Safety Training Program

Training is an important tool for developing worker’s abilities to identify hazards and apply safe work practices and controls to mitigate and/ or eliminate hazards and properly respond if/when an incident takes place. Training comes in the form of safety Certification, Qualification, Authorization and Awareness. All employees will receive training as necessary for their specific role and job duties, and as required to satisfy applicable regulatory requirements. All trainings are provided by ECI authorized trainers, third party organizations and/or other web-based sources and are available throughout the calendar year.

3.1 Safety Qualifications and Certifications

A qualified employee is one who possesses a recognized degree, certificate or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his or her ability perform a specific task and resolve problems relating to the subject matter. The following is a list of Qualification and Certification trainings that are available to selected ECI Employees (based upon their job descriptions) throughout the calendar year:

- **40 Hour HAZWOPER and 8 Hour Refresher Certification**
- **First Aid / CPR / AED Certification**
- **Defensive Driving Certification**
- **Forklift Operators Certification**
- **Crane Operators Certification**
- **Genesee & Wyoming Roadway Worker Protection for Railroad Contractors Certification**
- **Rigging and Signalperson Certification**
- **Confined Space Certification**
- **Competent Person Certification (multiple types)**

- **Work Zones, Traffic Control and Flagging Operation Certification**
- **PHMSA Operator Qualification**

3.2 Safety Authorizations

Authorized employees are approved and assigned by ECI to perform a specific type of duty or duties. The following is a list of Safety Authorization trainings applicable to the work commonly performed at ECI.

- **Heavy Equipment Operators**
- **Aerial Lift Operators**
- **Arc Welding**
- **Torch Work**
- **Exothermic Welding**
- **Fusion Welding**
- **Shotcrete Operators**
- **Hydraulic Jack Operators**

3.4 General Safety Awareness Training

In addition to Certification, Qualification, and Authorization training ECI routinely conducts Safety Awareness Training on topics related to the work commonly performed at ECI. The purpose of these trainings is to provide ECI employees with hazard recognition skills, and knowledge and experience to aid in controlling hazards. The following is a list of Safety Awareness trainings that are typically required by all ECI field personnel.

- **OSHA 10 and 30 Hour**
- **Fall Prevention and Protection**
- **Trench and Excavation**
- **Electricity**
- **Hazardous Communication**
- **Personal Protective Equipment**
- **Respiratory Protection**
- **Hand and Power Tools**
- **Lock-out Tag-out**
- **Flammable and Combustible Liquids**
- **Bloodborne Pathogens**
- **Asbestos Awareness**
- **Lead Awareness**
- **Silica Awareness**
- **Biological Hazards**
- **Heat and Cold Stress**

Additional training requirements will be managed on a case-by-case. Contact your supervisor for more information on what training may be applicable to your role.

Section 4- Additional Health and Safety Resources

Safe Work Practices (SWPs)

ECI Safe Work Practices are aimed at protecting workers from hazards by providing them with information and tools to recognize and control hazards specific to a work activity before the work begins. When used and referenced properly, these SWPs provide the basis to a safe working culture across the organization. Each SWP identifies common hazards that exist (as related to the activity), expected hazard controls to be put in place, additional tips and tricks for assessing, measuring and controlling identified hazards, and then all corresponding regulatory requirements that must be complied to (e.g. OSHA). SWPs are continuously updated and new SWPs are released as required. It is the responsibility of each employee to understand the requirements and expectations contained within the SWPs. Hard copies and electronic copies of SWPs are made available to all employees. Content within the SWPs will also often act as the basis for the ECI Safety Focus of the week.

Hard copies of the SWPs are available at Corporate Health and Safety Facility. Electronic copies will soon be available.

Safety Data Sheets (SDS)

Safety Data Sheets for all chemical based materials used at ECI are available at the ECI Corporate Health and Safety Facility. Electronic copies are also available by contacting your supervisor or someone from the Health and Safety Team.

Tool and Equipment Operator Manuals

For all tools and equipment operating manuals will be available with the tool or piece of equipment. Electronic and paper copies are also available by contacting your supervisor or someone from the Health and Safety Team.

ECI Substance Abuse Policy

For all question regarding to drug and alcohol testing requirements will be available in the Health and Safety Office.

Online Reference Guides

OSHA - <https://www.osha.gov>

Federal Railroad Administration - <https://www.fra.dot.gov>

Federal Motor Carrier Safety Administration - <https://www.fmcsa.dot.gov>

Appendices

- 1 Corrective Action Report Form**
- 2 Weekly Safety Report Template**
- 3 Jobsite Hazard Assessment Form**
- 4 Site Safety Inspection Form**
- 5 Incident Reporting Process**
- 6 Preferred Personal Injury Health Providers**
- 7 Incident Investigation Form**



Corrective Action Report

Employee Name:

Date:

Employee Job Title:

Date of Incident:

Time of Incident:

Person(s) Involved:

Incident Description:

Violation of Policy? YES NO

Policy violated and how the incident violated it:

Corrective Action Agreement:

Report Prepared By:

Signature:

Others Present at Conference:

Employee Signature:

Date:

Safety Report of the Week

Loss Control Summary

Unsafe Behaviors

Personal Incidents

Vehicle Incidents

- First Aid Only
- * Non Work Related
- **BOLD** - Comp Claim
- *Italic* - OSHA recordable

- *Not at fault

Utility Incidents

Property Damage - Equipment

Vehicle Violation

- *Not at Fault

Property Loss

* No Loss other than time

Appendix 3 - Job Hazard Assessment Form



Job Hazard Assessment

ECI Project No. _____

Project: _____ **Date:** _____ **Time:** _____

EMERGENCY INFORMATION Emergency Call No. _____

911 Address: _____

ECI Employee in Charge: _____ **Sign -In**

Emergency Equipment Fire Extinguisher: _____

Location: First Aid Kit: _____

Eyewash Station: _____

PPE Requirements Minimum = Hard Hat, Safety Glasses, Hi-Visibility Clothing

(full-time) Additional: Steel Toe Boots _____

Reflective Vests _____

Specify Other: _____

Digsafe # _____ Exp. Date: _____

Job Description for Today: _____

Hazards **Controlling Methods**

Potential Energy _____

Working Above 6 ft _____

Slips/Trips/Falls _____

Operating / Working Equip _____

Excavations _____

Underground Utilities _____

OH Electric / Comm Lines _____

Rigging/Hoisting _____

Personal Lifting _____

Power Tools / Ext Cords _____

Cutting and Grinding _____

Dust and Vapors _____

Biological/Chemical _____

Open Flame and Hot Work _____

Extreme Weather _____

Traffic _____

Railroad _____

Confined Space _____

Working Over Water _____

Other: _____

Other: _____

Form Completed by: _____

Weekly Safety Meeting	Attended / Reviewed	YES
Safety Topic:		No

Monthly Inspections (1st of each month)	
Fire Extinguishers	
Eye Wash	
First Aid Kit	
Sign: _____	

Appendix 4 - Site Safety Inspection Form



ENGINEERS CONSTRUCTION, INC.

Date: _____
 Project: _____
 Inspector: _____
 Foreman: _____
 PM: _____

Jobsite Safety Inspection

Current Work Activities: _____

Foreseeable Hazards: _____

Safe	NI	Violation	Controlling Hazards	Comments / Type of Control or Corrective Action
			Jobsite Hazard Assessment	
			Falls	
			Cave-ins	
			Electricity	
			Struck By	
			Caught in between	
			Silica	
			Chemical Exposure	
			Potential Energy	
			Compliance Based Safety	
			SWP & SDS	
			Emergency Equipment	
			Emergency Response Plan	
			Safety Equipment	
			Behavior Based Safety	
			Overconfidence	
			Unsafe Acts	
			Complacency	
			Distraction	

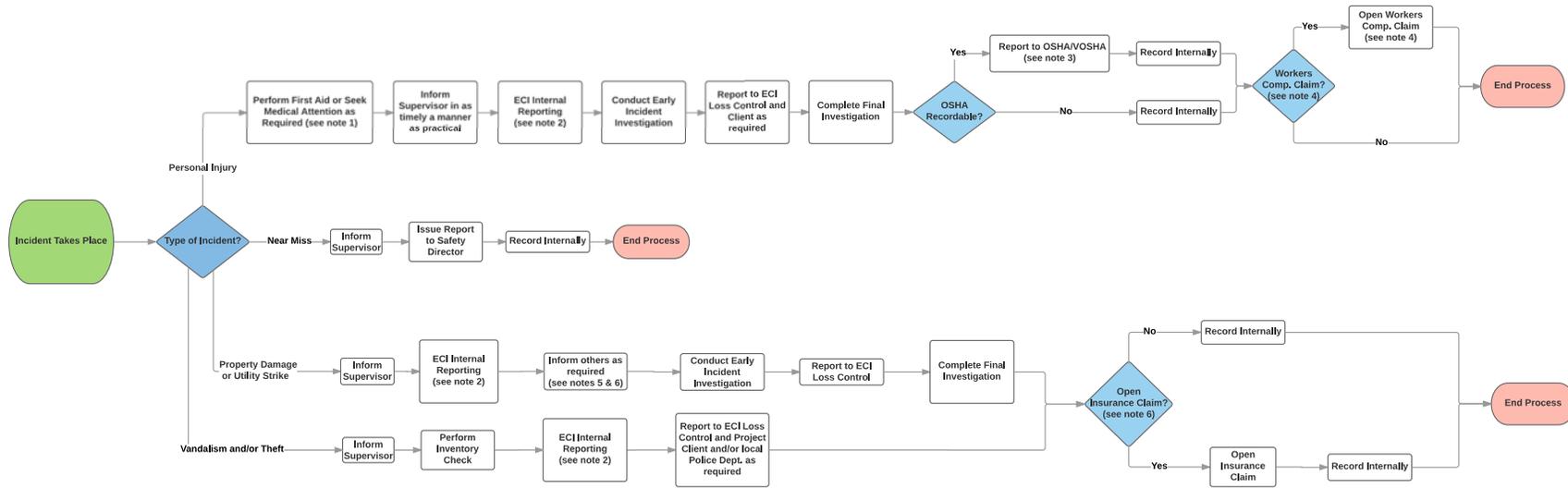
* NI - Needs Improvement

Appendix 5 - Incident Reporting Process

Updated February 2017



INCIDENT REPORTING PROCESS



Notes:

Incident = Personal Injury, Near Miss, Property Damage, Utility Strike, or Vandalism

- In emergency medical situations dial 911 or contact other local emergency medical response services as required.
In non-emergency situations that require medical attention contact the Safety Director for a list of preferred walk-in clinics closest to the location of the incident.
- ECI internal reporting consists of the following:
 - Incident victim or witness informs their Supervisor
 - Supervisor informs the Safety Director
 - Safety Director informs the Loss Control Group
 Additional reporting and notification requirements will be managed on a case-by-case basis.
- Any incident resulting in death, work-related hospitalization, amputation, or loss of an eye is required to be reported to OSHA within 24-hours of the incident (8-hours where death occurs). The ECI Safety Director is responsible for all OSHA reporting.
- A Workers Comp claim and/or Insurance Claim will be opened where the overall cost of the incident (sum of medical bills, property repair, etc.) is greater than the respective deductible cost. The ECI Safety Director is responsible for coordinating Workers Comp and Insurance claims accordingly.
- Any motor-vehicle related incident that takes place within the public rights-of-way (e.g. roadway) must be reported to the local police and the state Department of Motor Vehicles (DMV). The ECI Safety Director is responsible for coordinating police and DMV reporting accordingly.
- Where a utility strike occurs, the on-site Foreman or the ECI Safety Director shall contact the owner of the utility to report the utility strike. Contact the ECI Safety Director for more utility-company-specific reporting procedures.

Legend:



Appendix 6 - Preferred Medical Providers



Preferred Medical Providers

Champlain Medical Associates

150 Kennedy Drive
South Burlington, VT
(802) 262-6789
8:00 - 6:00pm M-F

Brattleboro Memorial Hospital

17 Belmont Ave.
Brattleboro, VT 05301
(802) 257-0341
Open 24 hours

Porter Hospital

115 Porter Drive
Middlebury, VT 05753
(802) 388-4701
Open 24 hours

Copley Hospital

528 Washington Hwy
Morrisville, VT 05661
(802) 888-8888
Open 24 hours

North Country Hospital

189 Prouty Drive
Newport, 05855
(802) 334-7331
Open 24 hours

Fanny Allen Campus Outpatient Clinic

790 Collage Parkway
Colchester, VT 05446
(802) 847-1170
8:00 - 8:00pm 7 days a week

Northwestern Walk-In Clinic

927 Ethan Allen Hwy, Suite 2
St. Albans, VT 05478
(802) 524-8911
8:00- 7:00pm Monday - Saturday

Northwestern Occupational Health

260 Crest Rd, Suite 101
St. Albans, VT 05478
(802) 524-1223
8:00 - 4:30 pm M-F

Clear Choice MD Urgent Care

410 Miracle Mile
Lebanon, NH 03766
(802) 276-3261
8:00 - 8:00pm open 7 days a week

Clear Choice MD Urgent Care

178 Swanton Rd
St. Albans, VT 05478
(802) 528-5100
7:00- 7:00pm 7 days a week

Northeastern Vermont Regional Hospital

1315 Hospital Drive, 191 Exit 22
St. Johnsbury, VT 05819
(802) 748-8141
Open 24 hours

Rutland Regional Medical Center

160 Allen Street
Rutland, VT 05701
(802) 775-7111
Open 24 hours

Clear Choice MD Urgent Care

173 S Main Street
Rutland, VT 05701
(802) 772-4165
8:00 - 8:00pm Open 7 days a week

Clear Choice MD Urgent Care

1200 Williston Rd
South Burlington, VT 05403
(802) 448-8205
8:00 - 8:00pm Open 7 dyaas a week

Clear Choice MD Urgent Care

798 US -302
Barre, VT 05641
(802) 744-0138
7:00- 7:00pm Open 7 days a week

Appendix 7 - Incident Investigation Form

	Incident Type:				Date of Report		
	Incident Sub-Type:						
Reported By:			Date of Hire:				
Employee Name:			Date of Birth:		Sex: M		
SSN:		Home Address:					
Occupation:							
Time Employee began work:			Dig Safe #:				
Project Manager:			Any time lost beyond date of incident:				
Incident location:							
Source / Cause of Injury / Damage:							
Specific Body Part or Location of injury/Damage :							
Severity of Injury / Damage:							
Phase of Employee workday at time of Incident:							
Names of Others injured in same incident:							
What Were Conditions Like?		Weather		Lighting			
When did incident Occur?		Month	Day	Year	Time (hrs)	Time (min)	AM/PM
Date/Time Occurred							
Date/Time Reported							
Witness Name(s):			Employee/Contractor/Other		Phone		
Tools and Equipment Involved:			Truck 858				
Additional Tools and Equipment:							
Environmental Release Info.		Product/Material			Amount	Unit	
Released							
Recovered							

<p>Full Description of Incident:</p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>
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Appendix 7 - Incident Investigation Form

Causal Factors:

Corrective Action Plans:

Reported by (Name/Title): _____

Date: _____

Follow-up Meeting Date: _____

Time: _____

Acknowledgment of Receipt

I acknowledge that I have received ECI's Safety Program Manual and am aware of its contents and my obligations as an employee of ECI. I understand that the contents of this Manual are presented as a matter of information only. To the best of my ability I will follow all applicable health and safety policies and procedures.

Date: _____

Printed Employee Name

Employee Signature