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Rodney Square Building Restorations, Inc.

# Safety Manual



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## **1. Introduction – Our Policy**

All employees of Rodney Square Building Restorations are to follow these rules for safe practices and render every possible aid to safe operations.

Supervisors shall insist that employees observe and obey every rule, regulation, and order necessary to the safe conduct of the work and take such action necessary to promote and ensure compliance.

*Employees should be alert to danger and unsafe conditions at all times. Among other things they should be aware of the condition, placement and installation of all load bearing devices, lifelines, guardrails, rigging, fall arrestors and barricades. The moment any irregularity in any equipment or process is discovered it is to be remedied if possible. If remedy isn't immediately available help is to be sought from management to correct the deficient condition. Under no circumstances is work to continue while an unsafe condition exists.*

No one is to knowingly work while their abilities or alertness is impaired by fatigue, illness, or other causes. No one will be permitted or required to do so.

Work shall be well planned and supervised to prevent injuries.

Approved protective equipment shall be worn when required by the nature of the task.

Horseplay, and other acts that could endanger the safety or well-being of employees, customers or the public is prohibited.

Most of the work we do is overhead. It may seem unnecessary to point out that while on a scaffold, bosun's chair or ladder falling and dropping objects on others is a constant possibility. However, *those of us who do the work every day know that complacency can occur every time we leave the ground. Working safely requires diligence!*

Ours is a physically demanding occupation and it requires lifting of electric motors, large containers, counter weights and other heavy objects. This is another area in which complacency can lead to injury. When lifting heavy objects, employees should bend their knees and use the large muscles of the legs instead of the smaller muscles of the back. Back injuries are the most frequent and often the most persistent and painful type of workplace injury.

All injuries shall be reported promptly to the supervisor/employer so that arrangements can be made for medical and/or first aid treatment.

## **2. Management Commitment and Employee Involvement**

### **2.1 Management Commitment**

Management has to initiate safety programs and safety training. They have to provide the resources to purchase safety equipment and allow employees the time to work safely. Management support and insistence that everyone get through every task without injury it is imperative.

### 2.1.1 Program Implementation and Dissemination

All employees shall receive a copy of this manual. Employees are to acknowledge receipt in writing. Within a week of receipt they are to acknowledge that they have read the manual. At that time the contents of the manual will be reviewed with the employee and all questions and concerns will be addressed. In the meantime, new employees will be closely supervised and assisted by their co-workers. Until they have learned what they need to know to ensure their safety and the safety of others all tasks they accomplish will be done under the close scrutiny of experienced co-workers and their designated supervisors.

### 2.1.2 Continuous Improvement

#### 2.1.2.1 Safety and Health Policy Statement

The safety and health of each of us must be everyone's concern and a part of every operation. It is every employee's responsibility at all levels. We will maintain a safety and health program conforming to the best practices of organizations of our type. To be successful, such a program must be undertaken with the proper attitudes toward injury and illness prevention. Such attitudes will result in cooperation in all safety and health matters, not only between supervisors and employees, but also between employees and their co-workers. Concern for each other is indispensable. It may be the most effective way to ensure safety.

With cooperative effort, our practices will continue to be safe and continuous improvement in the safety program will naturally result.

To record our progress in developing and improving the safety program the following activities will be enacted:

#### 2.1.2.2 Activities to Facilitate Continuous Improvement

##### 2.1.2.2.1 Annual Review

At least once a year, management will review what has been accomplished in meeting the objectives of maintaining safe operations and improving the safety program.

##### 2.1.2.2.2 Annual Report

At the conclusion of the Annual Review management will issue a report documenting the outcome of the review. All employees will receive a copy and are encouraged to respond to the findings with their own observations and comments. This feedback will serve as a primary aspect of the evolution of the safety program.

### 2.1.2.3 Accountability

Management will institute an accountability system where all personnel will be held accountable for not following work rules designed to promote workplace safety and health. Although disciplinary action will be an aspect of accountability it will not be the first resort. The objective is to improve safety, not punishment.

### 2.1.3 Task Analysis

Management will periodically review with employees each category of work and individual tasks, analyzing them step-by-step to see if there are any hazards in the equipment or procedures that haven't previously been recognized.

#### 2.1.3.1 Safety and Health Aspect at Each Site

Each site needs to be considered individually for safety and aspects that will affect worker's health. Each site must also be very carefully scrutinized for ways in which our activities may expose our customers, their tenants and visitors to injury. Identification of site-specific hazards is a management responsibility.

### 2.1.4 Employee Self Evaluations

As part of employee's periodic reviews employees will evaluate themselves regarding their compliance with the Safety Program.

### 2.1.5 Daily Self Inspection

Management requires that at the start of each day, and even when beginning each operation, workers should perform a "self-inspection". Mental, and at times written, check lists will serve to combat the complacency that can otherwise occur. The following list, although more comprehensive than one that would apply to any specific task, can serve as the source for the subset that will constitute an actual check list.

#### 2.1.5.1 Items for Management to Consider Regarding the Worker's Self Inspection Check List

Training and Ability / Expertise - Does the employee's training, knowledge and experience allow him to safely accomplish the task he's asked to undertake?

Availability of Personal Protective Equipment (PPE): safety shoes, gloves, safety glasses or face shield, hearing protection, fall arrest equipment including safety harness

Availability of First Aid materials

## Condition of Load Bearing Rigging

Condition of the Work Platform - all load bearing hardware and devices: motor mounts, stirrups, hardware. Rails and toe boards. Electrical lines and terminations / plugs. Compressors and other equipment.

Work Area - Isolation of the public from the area beneath the work platform. If a ground man is required ensure he knows his purpose. Make sure he has a hard hat.

Emergency Descent - Verify that an emergency descent plan has been established and that the equipment, materials and devices are in place to implement it.

### 2.1.6 Customer and Public Safety

#### 2.1.6.1 Work site Policy

Each site will have a work site Policy that will be a result of the Work Site Analysis.

#### 2.1.6.6.3 Work Site Analysis.

The work site will be analyzed to identify all existing and potential hazards prior to the start of work on a project. If conditions change or new circumstance arise those changes will become part of the site analysis.

### 2.1.7 Employee Participation in Safety Program

Safety is everyone's responsibility. Employees are required to comply with all safety guidelines, and encouraged to contribute.

#### 2.1.7.1 Evidence of employee involvement.

All employees will be issued, and sign for, this manual, agree to follow all practices and procedures described in this manual, and attend regular safety meetings. Further, all employees will be required to use and maintain proper PPE.

#### 2.1.7.2 Records of employee participation in safety and health program decisions.

This program is a team effort, and the employee's considerable expertise can be an invaluable asset in this program. You are encouraged to bring suggestions that can improve safety. Records will be kept of employee participation in regular safety meetings.

#### 2.1.7.3 The “Buddy System” and Mentoring

Management requires that employees help each other to be safe, and hold each other to the standards. Senior employees will be a major part of the training process and Management expects experienced workers to demonstrate a concern for safe operations that new employees will emulate.

#### 2.1.7.4 Acknowledgement of Receipt

In signing for this manual, employees agree to follow the guidelines and directives described in the Safety Manual.

### 2.2 Employee responsibility

#### 2.2.1 Employee Participation in Safety Program

##### 2.2.1.1 The “Buddy System” and Mentoring

When working as a crew, be aware of your co-workers. Help each other out, and hold each other to the standards. For new and inexperienced employees, senior employees will be a major part of the training process. They should instill a concern for safe operations early on. All employees need to support the Buddy System.

##### 2.2.1.2 Knowledge and Awareness

No employee is expected to undertake a job until he or she has been instructed on how to do it properly and is authorized to perform that job. No employee should undertake a job that appears unsafe.

##### 2.2.1.3 Safety Program

The Safety Program is designed so that all employees know what is expected of them, and what is required of the employer. The purpose is not to hamper you in the execution of your tasks, but to ensure that no unnecessary risks are being taken. Adherence to the Safety Program will ensure that all employees are safe and their practices do not put others at risk.

#### 2.2.2 Employee Evaluations

Safety compliance or non-compliance will be a part of periodic employee reviews.

### 2.2.3 Daily Self Inspection

At the start of each day, and even when beginning each operation, workers are to conduct a “self-inspection”. Mental, and at times written, check lists will serve to combat the complacency that can otherwise occur. The following list, although more comprehensive than one that would apply to any specific task, can serve as the source for the subset that will constitute an actual check list.

#### 2.2.3.1 Items For The Employee to Consider for Self Inspection Check List

Training and Ability / Expertise - The first point to consider when beginning a task is your own ability to work safely. If your training, knowledge and experience doesn't include the task you are about to undertake, do not proceed.

Personal Protective Equipment (PPE): safety shoes, gloves, safety glasses or face shield, hearing protection, fall arrest equipment including safety harness

First Aid materials

Load Bearing Rigging - Do not take anyone's word that the rigging you will use is adequate and secure. Before applying a load to any rigging element or assembly physically check every component: cables, hooks, outriggers, counterweight placement, tiebacks, cable clamps, lifelines, lifeline protectors, descent devices and rope grabs.

Work Platform - Check all load bearing hardware and devices: motor mounts, stirrups, hardware. Check rails and toe boards. Inspect electrical lines and terminations / plugs. Check that compressors and other equipment is secure.

Work Area - Ensure the public is isolated from the area beneath the work platform. Check that barricades and caution tape is where it needs to be. If a ground man is required ensure he knows his purpose. Make sure he has a hard hat.

Emergency Descent - Verify that are prepared to make an emergency descent. To do so you must have the equipment, materials and devices in place to implement it and you must know the procedure for doing so.

## 3. Work site Analysis

### 3.3 Employer's Obligation

“Work site Analysis” is the term OSHA uses to designate an activity that management and the employee accomplish every time they change tasks or locations. For us the work site can be a shopping center, high rise office building or a parking garage. All workplaces have safety hazards. Management will conduct baseline surveys that identify all safety and health hazards at the site at the time of the survey. All hazards found during these surveys will be eliminated whenever possible or controlled. All employees who may encounter the controlled hazards are to be trained in appropriate job procedures to follow to protect themselves from these hazards.



If conditions change at a site it is management's responsibility to update the baseline and implement the appropriate changes.

#### 3.3.1 JHA - Job Hazard Analysis

Management and employees work together to analyze safety and health hazards inherent in each job site and to find means to eliminate those hazards whenever possible, and otherwise to protect persons against those hazards. These job hazard analyses (JHAs) are revised as appropriate, for example, following a change in the job, the reappearance of a hazard, or an accident.

#### 3.4 Employee's Obligation

Properly trained employees are able to recognize hazards. They are obligated to report any hazard they find to the appropriate person so that the hazard can be corrected as soon as possible. Safety suggestions are welcome and all will be seriously considered. For urgent safety matters involving customer's property employees may address the matter with the property manager. For issues related to our operations the employee should notify their supervisor.

It is important that the job site be inspected periodically during the execution of the job. The site is subject to change. On the first day of the week, or after an absence re-inspect the work area, in order to identify new hazards. If the hazard can be removed, do so. If not, make a plan to mitigate the risk. If the safety checks take fifteen minutes or more, include them as a separate task on your timesheet.

Any accident or near miss is to be investigated in order to identify the cause of the accident. All accident reports are posted in the office and are open to comment by any employee.

##### 3.4.1 Employee reports of hazards

Employee reports of hazards will be recorded and retained. The individual making the report is not necessarily responsible for getting it written down, but will be asked to sign the written report, and attest to its accuracy.

##### 3.4.2 Accident/Incident Investigation

Investigating accidents and incidents presents another opportunity to identify hazards. For each accident, there usually are several steps that must be taken to prevent future occurrences. Management must investigate accidents and "near miss" incidents, so that their causes and the means for their prevention are identified.

### 4. Hazard Prevention and Control

## 4.5 Site Management

All work locations and each work activity need to be evaluated for hazards. Sites in urban environments or at locations that require long drives include hazards that jobs nearby don't. Likewise, pressure washing a tall building and restoring sealant in a parking deck are two activities with different hazards. Therefore, each site and each activity needs to be evaluated individually and every time they are encountered. Site rules need to be established. See [OSHA Job Hazard Analysis Guide](#).

### 4.5.1 Site Specific Hazards and Conditions

Perform routine walkthroughs of the work site to identify hazards and to track identified hazards until they are corrected. Specifically, tripping hazards, low clearances, power lines, etc. You know what can impede your ability to work and what can be a safety risk. These obstacles need to be identified.

### 4.5.2 Personal Protective Equipment

All employees **WILL UTILIZE ALL REQUIRED PERSONAL PROTECTIVE EQUIPMENT (PPE) AT ALL TIMES**. This includes, but is not limited to, eye protection, hard hats, safety shoes, life lines, etc., as required by the job. This is not optional.

See OSHA [Personal Protective Equipment Guide](#) and [OSHA PPE Fact Sheet](#).

### 4.5.3 Emergency Descent Plan

In any job working at height, a plan must be made for emergency descent of able as well as incapacitated workers. All materials for executing the plan must be in place.

### 4.5.4 First Aid

All vehicles are equipped with a basic first aid kit. Know what is included, and if items need to be replaced. If a serious injury occurs, dial 911. When rendering first aid, take precautions to prevent the spread of blood borne diseases. Use gloves, masks, etc, to protect yourself when rendering aid.

See the [OSHA First-Aid Best Practices Guide](#).

### 4.5.5 Emergency Contact List

It is very important that we have a good contact list in the case of emergency. Ensure that management has a solid emergency contact number.

## 4.6 Activity Safety Assessment

On every job, everyone is responsible for safety. Before beginning work, assess the site for possible safety hazards, and react accordingly. (Although very detailed, the [U.S. Army Risk Management Matrix](#) can be a helpful tool when assessing risk.)

#### 4. 6. 1 Two Point Swing Stage Scaffold

Working platforms shall be operated only by persons who are proficient in the operation, safe use and inspection of the particular working platform to be operated.

We operate the boards at significant height. **Anyone who falls more than 2 meters (6.6 feet) is at significant risk of serious injury**, and we routinely operate at heights in excess of 20 stories. A fall from a board can easily result in a fatality. To mitigate this high risk, all employees must utilize all PPE (harnesses, lanyards, lifelines, etc.) when working from the boards.

OSHA's guide (an "eTool") for operating 2 point swing stage scaffolds is at: <https://www.osha.gov/SLTC/etools/scaffolding/suspended/twopoint.html>

Platforms suspended from a single point are described on OSHA's site at: <https://www.osha.gov/SLTC/etools/scaffolding/suspended/singlepoint.html>

##### 4. 6. 1. 1 Fall Hazard

Training of employees in the operation and inspection of personal fall arrest systems shall be done by a competent person.

There are many falling hazards involved with working from scaffolds, lifts, and ladders. Take appropriate actions to mitigate these risks; always work with a lifeline. Always wear a harness securely. Don't cut corners.

See: [Fall Protection on OSHA.gov](#)

#### 4. 6. 2 Bosun's Chair

Working platforms shall be operated only by persons who are proficient in the operation, safe use and inspection of the particular working platform to be operated.

Bosun's chairs can be regarded as platforms suspended from a single point, which are described on OSHA's site at:

<https://www.osha.gov/SLTC/etools/scaffolding/suspended/singlepoint.html>

When stepping over the side of a 20 story building, it's too late to wonder if everything is set up properly. Before using the bosun's chair, inspect every part of the system, from the seat to the final tie back. Inspect the line, inspect the descent device, inspect the condition of the tie back, and inspect all connections.

#### 4.6.2.1 Fall Hazard

Training of employees in the operation and inspection of personal fall arrest systems shall be done by a competent person.

It is imperative that all safety measures are rigorously followed when working from the bosun's chair. Ensure all safety equipment, ropes, and harnesses are serviceable and in good working order.

See: [Fall Protection on OSHA.gov](https://www.osha.gov/Publications/fall-protection)

#### 4.6.3 Aerial and Scissor Lifts

Working platforms shall be operated only by persons who are proficient in the operation, safe use and inspection of the particular working platform to be operated. JLG Industries' web page for safety topics is [here](#). OSHA's tips for operating aerial lifts is at [https://www.osha.gov/Publications/aerial\\_lifts\\_safety.html](https://www.osha.gov/Publications/aerial_lifts_safety.html)

Working from an aerial platform or scissor lift poses many risks similar to the swing stage scaffolds. Harnesses are to be worn, and lanyards are to be attached to the hardware on the device installed for that purpose. Ensure when elevating, depressing, extending and/or retracting the boom that you are clear of obstacles and obstructions, and be aware of the speed at which each action occurs. Ensure that the aerial lift chassis is level, and outriggers are used if equipped. Use extreme caution when driving lifts with the boom extended. Remember that when traversing curbs the vertical motion on the basket, and therefore the operator, is a multiple of the height of the curb. A sudden drop from even a fairly low height can cause an operator to lose his footing, or worse.

Maintain a safe distance from power lines. Contact with high voltage lines is not necessary for the lift to conduct current to the ground. "Flashover" is when the charge jumps to a grounded conductor through the air. The aerial lift, and the operator, can form such a conductor. (The BPA, Bonneville Power Administration, requires a Minimum Approach Distance (MAD) for non-electrical workers of 15 feet for lines energized up to 345KV. Higher voltages require greater distances.)

#### 4.6.3.1 Fall Hazard

Training of employees in the operation and inspection of personal fall arrest systems shall be done by a competent person.

Falling from the lift presents risks similar to falling from any other working platform. In addition, there is the risk of the lift itself falling. This can happen when the surface the lift is on collapses or failure to use outriggers. Ensure the chassis is in a suitable location before going up. Don't take shortcuts with safety.

See: [Fall Protection on OSHA.gov](https://www.osha.gov/Publications/fall-protection)

#### 4.6.4 Frame Scaffold

Ensure that scaffolding is set up securely, and that work surfaces are level, and kept as clear as the job allows. See [OSHA Manuals on Scaffolding](#)

##### 4.6.4.1 Fall Hazard

Falling while climbing frame scaffolds is a hazard that doesn't exist when using other platform systems. Mitigating this hazard is mostly a matter of close attention to hand and foot placement. Wearing hard hats is a good idea while ascending frame scaffolds.

Proper set up reduces fall risks.

See: [Fall Protection on OSHA.gov](#)

#### 4.6.5 Ladders

When using ladders, ensure they are securely placed and level. Follow any safety instructions printed on the ladder. See [OSHA Manual on Ladders](#)

##### 4.6.5.1 Fall Hazard

Falling from a ladder is often the result of complacency. One used to working at heights over 100 meters can feel that a ladder is nothing to worry about. A fall from a ladder, however, can result in serious injury or death. Remember to keep your center of gravity between the verticals, don't lean out to reach the work. If you have to lean out to accomplish your task, the ladder is improperly placed. Take a few minutes to move the ladder rather than risking a trip to the ER.

See: [Fall Protection on OSHA.gov](#)

#### 4.6.6 Ground

##### 4.6.6.1 Highway Travel

The safety and health risks associated with highways and local travel are well known. Factors associated with the work we do compound these risks. Consider things like fatigue and shifting equipment in the cargo area and attached to ladder racks while traveling on company business.

**AT NO TIME WILL ANY EMPLOYEE OPERATE A COMPANY VEHICLE WHILE UNDER THE INFLUENCE OF DRUGS OR ALCOHOL.** Seat belts will be worn at all times and all drivers will follow the posted speed limits. Headlights should be used at all times. Prior to movement, ensure all lights are operational, windows and mirrors are in good working order.

Ensure any cargo is properly secured. Drive defensively, and stay alert.

#### 4.6.7 Pressure Washing

Pressure washers are used routinely, and can be dangerous. Be aware that the stream can easily cause serious injury, such as severed digits. All required safety equipment, including safety shoes, will be worn when pressure washing, and all employees will utilize safe practices while pressure washing.

#### 4.7 Safety Policy Compliance

##### 4.7.1 Disciplinary Policy and Records

As stated above, all employees, including all levels of management, are held accountable for obeying site safety and health rules. The following disciplinary policy will be applied to everyone by management:

1. Oral warnings
2. Written reprimands
3. Suspensions, without pay
4. Termination

#### 4.8 Emergency Drills

Conducting periodic Emergency Drills will improve reactions in an actual emergency. You don't want the first time an emergency descent is conducted to be in an emergency situation. Periodic Drills will be conducted to ensure every employee is prepared to act properly in an emergency situation.

#### 4.9 Annual Review

As part of the annual safety and health program evaluation a review of all near misses, first aid incidents, and entries on the [OSHA 300 Log](#), as well as employee reports of hazards, will be conducted. The results of this analysis will be a significant factor in establishing the goals and action plans for the next year.

### 5. Training

The first step in the training process is a basic one: to determine whether a problem can be solved by training. Whenever employees are not performing their jobs properly, it is often assumed that training will bring them up to standard. However, it is possible that other actions (such as hazard abatement or the implementation of engineering controls) would enable employees to perform their jobs properly.

Ideally, safety and health training should be provided before problems or accidents occur. This training would cover both general safety and health rules and work procedures, and would be repeated if an accident or near miss incident occurred.

Problems that can be addressed effectively by training include those that arise from lack of knowledge of a work process, unfamiliarity with equipment, or incorrect execution of a task. Training is less effective (but still can be used) for problems arising from an employee's lack of motivation or lack of attention to the job. Whatever its purpose, training is most effective when designed in relation to the goals of the employer's total safety and health program.

The employees themselves can provide valuable information on the training they need. Safety and health hazards can be identified through the employees' responses to such questions as whether anything about their jobs frightens them, if they have had any near-miss incidents, if they feel they are taking risks, or if they believe that their jobs involve hazardous operations or substances.

#### 5. 10 Safety Manual

It is the employee's responsibility to read and understand all aspects of this training manual.

#### 5. 11 Safety Meetings and Minutes

Periodic Safety Meetings will be conducted, in order to review safety policy, and to give employees and management an opportunity to discuss any additions or revisions to policy. All employees will attend these safety meetings.

#### 5. 12 New Employee Safety and Health Orientation

All new employees will receive this manual and will be instructed on safe work practices. This is the responsibility both of management and crews on job sites. A crew member who is unaware of safety practices can endanger himself and others. To mitigate this risk, all new employees will be made aware of all safety policies before beginning work on any site.

#### 5. 13 New Employee Probation Period

According to company policy new hires are subject to a probationary period. During this period they are to receive special care and consideration both from management and other employees. An inexperienced worker is a special hazard. New employees need to be shown the ropes for everyone's safety.

#### 5. 14 Ongoing Training on Safety Topics

Management will routinely provide safety information through various channels. Employees are expected to read this information and to develop an interest in the subject. Training on new equipment or processes will be conducted.

(OSHA maintains reports on fatal accidents at: <https://www.osha.gov/Publications/fatalfacts.html>. Look-

ing over this site can illustrate the hazards of failing to maintain good safety discipline. )

## 5. 15 Records

Records of sales, costs, profits and losses are essential to all successful businesses. They enable the owner or manager to learn from experience and to make corrections for future operations. Records of accidents, related injuries, illnesses and property losses can serve the same purpose. The primary purpose of OSHA-required record keeping is to retain information about accidents that have happened to help determine the causes and develop procedures to prevent a recurrence.

1. The company will maintain a report on every injury or job-related illness requiring medical treatment.
2. Record each injury or job-related illness on OSHA Form 300 (Log of Work- Related Injuries and Illnesses) using the instructions provided.
3. Prepare a supplementary record of occupational injuries and illnesses for recordable cases on OSHA Form 301 (Injury and Illness Incident Report).
4. Every year, prepare an annual summary using OSHA Form 300A (Summary of Work-Related Injuries and Illnesses). Post it no later than February 1, and keep it posted until May 1, next to the OSHA Workplace Poster.
5. Retain these records for at least five years. Periodically review these records to look for any patterns or repeat situations. These records will be used to identify high-risk areas that require attention.

## 6. Conclusion

According to the Bureau of Labor Statistics, over 100,000 injuries occur in the construction and restoration industry each year, with at least 1,000 fatalities resulting. The purpose of this manual and the safety program is to ensure we don't contribute to these figures. Much of our work is conducted at height, and any lapse in safety diligence can easily result in a death. Taking a strong and sincere interest in safety and following the safety program is our best method to prevent serious injuries and fatalities.