

APPLICATION FOR
Voluntary Protection Program (VPP)
October 1999

Rifenburg Construction, Inc.
DOT Project D257950
Route 332 Reconstruction
Canandaigua, NY

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- Table of subcontractors and bargaining units
- Example of letters sent soliciting VPP commitment
- VPP Information packet
- Letters of commitment returned

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- Example of corporate newsletter
- Near miss database
- Client evaluation on Rifenburg Performance - Gouverneur Talc

Corporation

- Rifenburg Inspection History
- Example of agenda - weekly managers meeting (7/21/99)
- VPP Poster
- Annual Safety Day Agenda
- Current Goals and Objectives

Organization

- Organizational Chart and Position Descriptions

Written Materials that include safety and health elements

- Employee Evaluation Form - performance appraisal
- Employee Handbook - Progressive discipline policy section
- Initial hire safety package - Safety Rules handbook, hazard communications and hiring agreement.

Program Evaluations

- Respirator program annual review
- 1998 Near Miss Summary
- "What's killing our employees" BLS Summary
- Truck Safety
- Corrective Action Plan - Truck and Bus incident "lessons learned"

Contract Workers

- Subcontractor Prequalification
- Subcontractor Agreement

Safety Committee

- Shop inspection that triggered safety committee (4/21/98)
- Items for discussion - OSHA meeting (7/8/98)
- Initial safety committee structure meeting (7/23/98)
- Notice for employee involvement (7/24/99)
- Agenda to discuss results - (8/10/98)
- Vendor solicitation for seats on committee - (8/10/99)
- Press release on formation of committee with OSHA
- Example of safety committee agenda (2/8/98) and minutes (3/8/98)
- Near miss investigation - tar kettle

Safety committee - On-site

Minutes from VPP initial meeting and inspection - (8/2/99)
SC Agenda - (9/20/99)
SC member posting

Worksite Analysis - Company examples

Talc mine (5/6/98)
St. Johnsville (7/8/99)
East Greenbush (10/18/99)
Ushers Road (5/3/99)

Site Inspections - Rochester

Project hazard assessment (pre-work)
Pre-work assessment - (7/20/99) during videotaping of site
Worksite Analysis - Rochester Project
Example of emphasis checklist - Excavations (requested by Fayle)

Accident Investigations

Company Policy (7/22/99)

+

Safety and Health Rules

Example of an employee "atta boy"
Specific "rules" for Rochester project, trucking (7/19/99)
Example of corporate tool box talk - near miss (5/3/99)

Medical Programs

Results of monitoring for PAH's and total dust - (8/19/99)

Training

Example of last Supervisor, Foreman training agenda (7/21/99)

Written Respiratory Protection Program

Rifenburg Safety Program Manual

INTRODUCTION - the application format and how it was put together.

It was decided early on that one person should not, and could not complete the application. Since many of the safety committee members are in the field and working on this project, it was decided that as many people as possible would help with the application from George Rifenburg, president of the firm to Shirley Flavin our most experienced flagger to Doug Bouge our on-site mechanic. Others who contributed to the effort were superintendents Ken Barth, Wes Hood, our project managers Bill Fayle and Jim Wilcox and our safety director Donna Shave.

The format is question and answer and should work well. The information requested is here. If a section of a policy answered the question, only that section is given yet the full document is attached. If a supporting document is attached its location is listed in the Attachments Summary.

The information given is honest, candid and succinct.

The project we are hoping to get VPP certification for is the largest the firm has worked on so far. Our staff there is the best of the best and the client; the New York State DOT is behind our efforts 100 percent.

Several months ago we reviewed the application requirements and started initiating programs or efforts to comply. As a result of this work, regardless of whether we are awarded VPP, the effort has made this company safer and smarter.

GENERAL INFORMATION

Company: Rifenburg Construction, Inc.
159 Brick Church Road
Troy, NY 12180
1-800-964-3265
1-518-279-6260 fax

Site: Canadaigua Project
Jim Wilcox - Project Manager
Bill Fayle - Project Supervisor
C/O Rifenburg Field Office
1653 Route 332
Farmington, NY 14425
1-716-398-0141
1-716-398-0231 fax
Kenbar@rifenburg.com

VPP Contact: Donna Shave - Director of Safety
Rifenburg Construction, Inc.
159 Brick Church Road
Troy, NY 12180
1-518-279-3265 x128
Donnash@Rifenburg.com

Subcontractor and Organized Labor

The following are involved with all or portions of the project:

Organization	VPP OK	Work	Contact	Telephone
Accent Striping	08-27-99	Line Painting	Edward Spiesz	1-716-823-7704
ATS Inc.	08-16-99	Traffic Control	Kathy Gorsch	1-716-492-4441
Brick and Concrete Local 11	10-25-99	Labor	Steve Remington	1-716-454-1212
Butler Fencing	08-25-99	Fencing	Neil Austin	1-800-992-8919
Donnelly Construction	08-10-99	General Construction	Carrie Speshock	1-518-664-9435
Eastwood Industries	08-18-99	Demolition and Clearing	Jane Rozborski	1-716-941-7420
Fischbach and Moore	08-23-99	Overhead Utilities	Beth Lewis	1-716-424-3838
Iron Workers Local 33	10-13-99	Rigging labor	Mike Downey	1-716-288-2630
Laborers Local 435	10-19-99	Labor	W. Pat Murphy	1-716-272-9890
Mexcon	08-12-99	Concrete	Julia Geraghty	1-607-397-9381
MS Unlimited	08-02-99	Traffic Safety Equipment	Mary Beth Sbaraglia	1-315-437-1291
North Country	08-22-99	Landscaping	Frank Pravata	1-518-561-0796
Northeast Caissons	08-16-99	Large Diameter Borings	Mike Henley	1-716-542-4608
Northeaster Studwelding	08-24-99	Bridge Deck	Susan Zeleznik	1-518-456-8440
NYS DOT	08-09-99	Project Engineer	Art Andrews	1-716-398-0224
Operating Engineers Local 832	10-19-99	Equipment Operation	Robert Brown	1-716-454-5411
Patterson-Stevens	08-03-99	Rail line Construction	Charles Patterson	1-716-873-5300
Pile Drivers Local 1163	10-6-99	Pile Driving	David Wagner	1-315-923-2611
Rochester Rigging	10-13-99	Steel Erection	Kelly Gilligan	1-716-657-7665
Simpson Seeding	08-02-99	Site Restoration	Carol Simpson	1-315-265-8213
Sunstream Corporation	08-13-99	Asbestos Removal	Gaenett Bolan	1-607-724-4400
Syrstone	08-19-99	Materials	Edward Monk	1-315-458-7723
Videseal	08-18-99	Subsurface Filming	Gary Amadori	1-716-646-6825

Collective Bargaining Representatives

Rifenburg is a non-union firm but has some union forces working on this site. In addition several sub-contractors use union and non-union forces. The contact information listed covers the crafts that are working or will work on this site.

Millwrights', Piledrivers' and Divers - Local 1163 Mr. David Wagner - Business Representative PO Box 31 30 Galen Street Clyde, NY 14433 1-315-923-2611	Operating Engineers Mr. Pat Murphy Box 93310 Rochester, NY 14692 1-716-272-9890
Iron Workers Local 33 Michael Downey 154 Humbolt Street Rochester, NY 14610	Bricklayers and Allied Craftworkers Local 11 Mr. Steve Remington 480 St. Paul Street Rochester, NY 14605 1-716-454-1212
Rochester Laborers 435 Mr. Robert Brown 20 Fourth Street Rochester, NY 14609 1-716-454-5800	

Number of Employees: 420 (company wide)
 Site Employees (routinely on-site): 55
 Contract Employees (routinely on-site): 20

Type of Work Performed: Construction of two additional travel lanes along approximately nine miles of highway; reconstruction of existing lanes and installation of a 30-foot grass median.

TASK	Quantity	Brief Description
Earthmoving - Lane Construction	4 lanes at 36,960m	See above
Water Line Installation	15,000 ft	Abandon existing and install new 12" main
Blasting and Spoil Removal	400 cy	Removal for pipe trenching
Electrical Utility Replacement	Seven miles of new overhead lines	Relocation of existing (parallel construct)
Bridge Demolition and Replacement	One span over rail	Demolition of single lanes to a double
Rail line Reconstruction	2,900 ft	Add new rail
Stormwater system	40,000 ft	New drainage for highway
Demolition of Structures	5	Removal of buildings in new travel path
Paving and Curb	36,960 ft	New curbing along project

The cost to complete the project has been estimated at \$26,328,545.91.

Standard Industrial Code: 1611 Highway and Street Construction
 1622 Bridge, Tunnel & Elevated Highway
 1623 Water, Sewer and Utility Lines

Injury rates

Since this is a new project, a true incidence history will be difficult to compile. Offered are the rates for Rifenburg Construction *and* rates for the project based on hours-worked to-date. The project was started on June 24, 1999.

Injury Incidence Rates

<u>On-site Employees</u>				<u>Company-Wide</u>		
Year	Hours Worked	Recorded Injuries	Rate	Hours Worked	Recorded Injuries	Rate
1997		NA		358,380	3	2.79
1998		NA		547,559	3	2.92
1999	23,093	0	0	543,186	10	3.07

Site 3-year Average = zero

BLS Industry Average of 4.5
 For Standard Industrial Code 16 – Heavy Construction

Lost-Work Day Cases

<u>On-site Employees</u>			<u>Company-Wide</u>	
Year	Recorded Lost & Restricted Workday Injuries	Rate	Recorded Lost & Restricted Workday Injuries	Rate
1997	NA			1.116
1998	NA			1.095
1999	0			2.76

BLS Industry Average of 4.4
 For Standard Industrial Code 16 – Heavy Construction

MANAGEMENT LEADERSHIP

Commitment

- What is Rifenburgs approach to managing the development of the site health and safety policy?

A balance of profit and safety. Rifenburg recognizes a clear link between safe operations and profitability. If the workforce gets hurt, trenches collapse or there is an accident involving one of our trucks, the project will suffer and we lose good people and money. If operations lend themselves to a smooth flow of materials and labor, it's good business. For example, over the last few years we have made an effort to educate the employees on the value of using trench boxes. These devices limit the amount of materials being removed while maximizing the safety of the crew. On this project, using this approach, we are putting in record amounts of waterline with little hazard to the workers and real efficiency for the firm.

During an incident last year where a traumatic event happened on one of our NC worksites, the firm immediately recognized the effects of the accident on our people and scheduled a critical incident stress debriefing immediately following, for those who witnessed the accident. We recognize the damage that an accident can cause emotionally to the work force. There is no dollar value for this type of loss.

Last, unsafe employees are not tolerated at Rifenburg. In one case this summer, near miss history data was used and an employee was terminated due to his continued unsafe work practices.

- How is this commitment communicated to the employees?

Our safety commitment starts with our corporate mission statement "Safety, Productivity and High Quality is our Goal." This statement is displayed on our newsletters and project signage. Each quarter, the president of the firm, George Rifenburg delivers a "Presidents Message" that routinely encourages safety. In our most recent newsletter George says in regard to the VPP effort "To accomplish this (VPP) we all have to make safety our #1 goal in the company." Management also sets by example; if equipment is needed to make a job safer or something needs to be modified to make it better, there is never an issue with cost. Never.

- What system is used to set goals for safety and health?

Reliance on our Experience Modifier (EM) is one method we use to gauge safety performance. Though the company has almost doubled in size and work over the last five years, our EM has remained near 0.70 for the last two years declining from a 0.89 several years ago. We also rely heavily on near miss reporting to head off problems before they might cause an incident or injury. This is the most common method we use for highlighting areas where goals need to be set. We love near misses!

To gauge how well we are doing as a firm, we also send out Client Evaluations at the completion of projects to get an idea from the client how we did. The first item on the questionnaire is: "Considering the hazards present at this work site was the job completed in a safe fashion? Are there any areas in regard to safety that we might improve? "

- How are these goals and objectives communicated to the employees?

Toolbox talks are completed on each project either daily or weekly depending on the client. If there is a specific objective (like reducing heat-related injuries) the topic is discussed right away. We also present goals like reducing fall injuries at a company wide Safety Day held each winter in NY and in NC. Our Director of Safety presents past performance and objectives for the following year. These goals are backed up by trends that have been discovered either through near miss reporting or incidents reported for the year. Since there might be non-readers among the workforce this Safety Day is a great method for getting the word out.

We use the quarterly newsletter, which is sent to the home of each employee to communicate our safety objectives.

Last, the majority of our employees are OSHA hazwoper trained. During the annual refreshers, trends are discussed and methods to eliminate or reduce accidents or injuries are offered.

- Is top management visibly involved in the safety and health program?

That's the neat thing about Rifenburg. George Rifenburg considers safety equal to production and profit. George was the driving force behind the formation of our award winning safety committee (he's a charter member) and also made the final decision on applying for the VPP. At the weekly managers meeting where top management gets together, safety is almost always an item on the agenda for discussion. This might range from where crews will be working to complete exposure sampling, to reviewing near misses for everyone's benefit.

During the annual Safety Day there numerous topics that are presented to the employees - managers are part of this presentation. Last year managers presented topics on the reasons behind preventative maintenance of equipment and the inspection of lifting devices. A favorite was the displaying of lifting straps and chains that had been taken out of active service due to damage. Some of these devices were in sorry shape and easily made the point that inspections needed to be ongoing.

**SITE SAFETY AND HEALTH
POLICY
(attached)**

Current Years Site Safety Goals
And Objectives
(attached)

Organization

- How do the site safety and health functions fit into the overall management organization?

From the field foreman to project managers, safety is a part of the job. Granted, production is foremost in most cases but this is tempered with safe operations. Since the majority of the firm's work is highway construction there is a clear link with the Owner (NY DOT) in regard to safety. During the pre-work project get together, our Director of Safety and the DOT determine what hazards might exist and how they will be dealt with. The regional DOT safety director is a member of our safety committee.

This idea of getting a head-up on what may be coming down the road safety-wise reflects how the Rifenburg organization works. This is a firm where there can be no surprises.

Here is a recent example. Early on in one project the project manager recognized that a confined space entry would be required. It was his job to put together the team, acquire what equipment was needed and coordinate this effort with the client (for confirmation sampling). This work is done routinely and not by exception.

- Do you have an organizational chart depicting the relationship of the site safety and health personnel to the overall organization?

Yes. Due to the size of this project, Rifenburg has devoted a great deal to the safety and health responsibilities. The Project managers are both 40-hour trained and have received numerous hours of training in other areas like confined space entry and air monitoring. The Director of Safety is also a dedicated resource to this project and visits the site almost weekly.

Our environmental manager an associated professional safety and occupational health and safety technologist has also been given safety authority for the site and works closely with the project managers as needed. Both the safety director and environmental manager report directly to the president.

Responsibility

- How is safety and health responsibility assigned to line and staff employees?

Over the last few years there have been efforts at Rifenburg to first off make sure everyone knows that *they* are responsible for their own safety. It is clear that from the top down, everyone who runs a project from a desk (or from a pick-up) knows safety is their responsibility.

Safety performance good or bad is often documented in an employee's file. This information and our annual evaluation form (which has a safety component) is used as a tool for recognition or advancement in the firm. Our employee handbook further stresses the safety responsibility by having a progressive discipline policy - three strikes and your out. Unsafe employees are not tolerated at Rifenburg. An example of a warning is attached.

Examples of written materials that
include safety and health elements
(attached)

Accountability

- What system is used for holding line managers and supervisors accountable for safety and health and how is this system documented?

Peer pressure might be the most effective system has we have for safety accountability. In one case, several years ago, a project manager was involved in the installation of a deep structure without proper shoring. Nothing exciting resulted but the employees and foreman soon reported back to the corporate offices what had happened. Because we have been training in safe operations for several years, what might have been business-as-usual in the past, created an uncomfortable situation for all. As a result, the manager was spoken to and he acknowledges that he put production in front of safety. The same situation happening today is almost unthinkable. That same project manager now contacts someone in the safety department for help - and he has.

We also gauged managers and supervisors during their annual performance evaluations specifically on safety. This portion of the evaluation is given below.

KEY: (O)=Outstanding (AS)=Above Satisfactory (S)=Satisfactory (RI)=Requires Improvement (U)=Unsatisfactory (NA)=Not Applicable (NQ)=Rater Not Qualified to Answer							
PERFORMANCE FACTORS	O	AS	S	RI	U	NA	NQ
<u>QUALITY OF WORK</u> : The ability to do work with accuracy and completeness							
<u>QUANTITY OF WORK</u> : Production relative to what is expected							
<u>JOB KNOWLEDGE</u> : The degree of mastery of details of all phases of the job, including use of method, tools, and materials							
<u>ORGANIZATION OF WORK</u> : The ability to independently plan, arrange, and complete work with minimal supervision/oversight							
<u>TECHNICAL SKILLS/KNOWLEDGE</u> : Degree of knowledge of the technical aspects and skills of the position							
<u>SAFETY</u>: Attention to, and observance of the Rifenburg safety rules and practices, incidents.							

Performance Appraisal Forms (Attached)

Resources

- What resources are devoted to the Rifenburg health and safety effort?

Safety related expenses were \$110.5k for the year 1997, \$70k for 1998 and \$119k for 1999. These figures include an estimated \$10,000 annually for safety training sessions for employees, and \$4,500 for the administration of a company-wide drug and alcohol program.

In addition to these expenses, safety related tasks consume 160 % of the salary for two management staff positions. Supervisory staff devote project time for safety tool box talks and training of new hires. Furthermore, twenty + employees are paid their regular hourly salaries to attend monthly safety committee meetings.

Planning

- How is safety and health part of the overall management planning effort when increases in the workforce, new equipment purchased or production goals are set?

As stated earlier there are few projects awarded today that do not include a safety and health component. Prior to project initiation the Safety Director, Project Superintendent and owner prior to any work review each project. These meetings are mandatory for our state work.

Production rates vary with the type of work being completed and material encountered. In most cases, production is weighed against safety by default. Working too fast for conditions will not make money. As an example, we have learned in planning excavation work that use of a protective trench box to install water line is safer - and we can make more money than just hogging materials out.

With over 40 years in the business, Rifenburg has a good idea of what production is manageable for the conditions when we bid.

Program Evaluation

- How does Rifenburg evaluate its safety and health programs and efforts? If corrections are needed, how are people held accountable for the change?

Our safety committee is the key to changes in our programs. It seems that when there is a concern in the field, it is brought to the attention of the committee for resolution. As a result we have made a point of reacting to issues from the workforce quickly. For example, several mechanics were concerned about air quality in the shop, we recognized that we needed to investigate this and sampling was conducted. Interestingly enough, the contaminants we were searching for (dust) were not a true concern but another, carbon monoxide was. As a result recommendations were made and these "fixes" were discussed with the guys to ensure it would not happen again.

Each employee involved now realizes what they did to contribute to the hazard and what they need to do to correct it. Discipline would not have been of any value since it was the time for the guys to learn. However, if the conditions are repeated, those involved will receive a warning notice.

- How are recommendations from the program evaluations into the safety and health objectives for the next year?

At the end of each year, the near misses, accident and injury data is reviewed and trends highlighted. At our annual safety day this data is shared with every employee in the firm. Case histories are given where possible and we take the time to encourage safer work practices in these trouble areas.

We then take these trends and further expand on the area during our annual 8-hour refreshers and competent person training. Last year (1998) the emphasis was on sling safety and falls, this year, trends indicate that we will be targeting visibility and communications at the worksite to reduce struck-by and caught between accidents, incidents and near misses.

Recent Program Evaluations

- If your incident rates or lost workday cases are above the national average, what are the long and short-term strategies for reducing these incidents?

The incident rates for Rifenburg Construction are below the national average for the construction industry, but we continue to seek ways to eliminate incidents and reduce lost workdays. We are currently working with our workers compensation insurance carrier to devise a better return to work program for injured workers.

We are also addressing the current method for reporting injuries, in an effort to have quicker contact with the injured employee, and treatment options.

Contract Workers

- Is the past health and safety performance of Rifenburgs subcontractors considered prior to the bid or award?

Over the last 40 years of business we have gleaned out what contractors we would not work with from project experience. Recently, we have been using the OSHA Establishment search to gauge inspection history for possible sub-contractors. Each year, the safety department sends a full package to each subcontractor for the up coming season, which includes signed agreements for both safety and Equal Employment Opportunity. Subcontractors are given a copy of the Safety Program, Hazcom Program, and Affirmative Action Policy.

- How are subcontractors evaluated to ensure they have a good safety and health program and use it? How are subcontractors logged for site entry and exit?

Subcontractors are asked to submit their safety programs to our Safety Director. If a subcontractor does not have a program, they sign an agreement, stating that they will abide by the safety rules and regulations governed by Rifenburg Construction, Inc. When project safety inspections are conducted, subcontractor's employees and their operations are evaluated, along with the ongoing activities of the Rifenburg crews.

We will be submitting to each contractor starting in the year 2000 a pre-qualification checklist that will include citation history, lost time and incident data and a letter from their agent stating their experience modifier. This procedure is new to Rifenburg and resulted from our working with International Paper where such submittals were required of *us and our subcontractors* prior to working in their sites. We recognize that this is good business.

Though the project has already been awarded and contracts let, we have looked into each contractor's safety performance.

- How are subcontractors handled when there is a need for correction or control of hazards that are reported or observed by Rifenburg?

Allowances for correction start with our initial contract. If the contractor is deemed unsafe - he or she is gone from the site. They are issued a warning and if within seven days they have not got their act together our contract allows us to replace them.

We try to work with our subcontractors in regard to site safety and have made many of our programs available for their use. If our subs are safer that is a reflection on the entire project. As example, if a site audit finds a contractor without a working back-up alarm in his vehicle, we ask him to take the time to get the alarm fixed before he can return. If ignores our request and returns to the site without an alarm, he is gone for the project.

In one case, a near miss with a dump truck and a school bus, created a real mess with our client. We spoke with the trucker, explained what he needed to do to be a safer driver, and provided him and the entire trucking fleet with additional training that night from an outside source. Today, he is a loyal trucker and knows what we expect of our subs. To simply strike him from the ranks would have been a poor approach to shaping a safer, cooperative work force.

- What method of tracking does Rifenburg use when a subcontractor records an injury or illness?

Injuries are reported to Project Superintendents and are noted in the daily log of the specific project. For the Canandaigua Project, all subcontractor injuries and illnesses will be reported to the Safety Director.

- How are safe operations encouraged at the site? How does Rifenburg deal with non-compliance by subcontractors or their employees?

As mentioned, Rifenburg does not tolerate unsafe workers. If they cannot be retrained, they are replaced. The same goes with subcontractors.

Our company philosophy is to promote the idea that safety is good business. If during a safety audit someone is involved in an unsafe action, we will pull the supervisor or foreman aside and have him speak with the offender. We try our best to keep the safety authority intact at the field level. Though hard hats might go on when the safety director arrives, these incidences are becoming unusual.

If a subcontractor is not following the safety effort, we will take him aside, explain the need to follow good safety practices and encourage him to comply. We also make it clear that his participation is needed or we will ask for the subcontracted employee to be replaced. We have done this in the past and it make a great method of alerting not just that firm but others on the site that safety is really first.

Information on Contractor Employees on-site

Due to the many tasks required for this project, some subcontractors might be on-site for only a few days (centerline painting) or for months (utility installation). Following is a list of each subcontractor, what they are doing and how long they will be involved with the project.

Subcontractor	Task	Est. time on site (days)
Accent Striping	Stripe	20
Advanced Traffic	Signage	30
Atlantic Testing	Survey	650
Butler Fence	Fences	20
Donnelly Construction	Saw cutting	5
Eastwood Industries	Clear and Grub	60
Elderlee Inc.	Signage and rail	60
Fishbach & Moore	Signal and electric	350
Mexcon Inc.	Curb and sidewalk	120
North Country	Landscaping	60
Northeast Caissons	Borings (bridge)	5
Northeaster Stud Welding	Deck welding - bridge	10
Patterson-Stevens	Rail construction	30
Rochester Rigging	Steel picks	10
Simpson Seeding	Seeding	45
Sunstream	Asbestos Abatement	15
Videseal Corporation	culverts	10

Employee Notification

- How were the site employees, subcontractors and their employees notified of the VPP effort?

Meetings were held on-site with the owner (New York State Department of Transportation) engineer-in-charge and his staff for their commitment. Also present at this meeting was the head of the DOT safety department for the region.

The site employees were notified through the company newsletter and by the on-site safety committee (SC). This on-site team is charged with keeping the site employees up to date on our VPP progress. At least one of the on-site SC members is also a member of the company wide SC.

Each subcontractor was also notified by mail of our effort and an information packet on the program was provided. A letter to Rifenburg stating their cooperation verified their commitment.

Since there is organized labor on the work force, each union represented was contacted by telephone to answer any questions on the VPP effort. Also a letter was sent, again with a VPP information packet. A letter to Rifenburg stating their cooperation acknowledged their commitment.

Several parties had some great questions however; these were answered to their satisfaction.

- How did you let everyone know that they still have the right to contact OSHA and or file a complaint?

The OSHA information sheet fact sheet 88-10 was sent to each party contacted. During the telephone conversations the ability to file or contact OSHA was also emphasized.

- Are the employees aware that they have a right to the results of the self-inspections and accident investigations?

Yes. All current inspection results and exposure samples are posted at the project for anyone to see. Near misses are also posted. In addition, if exposure sampling is completed (total dust for this project) the sampling results were sent to mailed employee.

EMPLOYEE INVOLVEMENT

Degree and Manner of Involvement

- Specifically, how does Rifenburg involve its employees in safety and health for the firm?

A group of employees that represent a cross cultural selection from the company, participate in monthly safety committee meetings. Volunteering employees are asked to make a two-year commitment to the group.

Employees are encouraged to report safety concerns to the safety hotline number or to any supervisory personnel. More importantly, employees are asked to be mindful of their coworkers and to take corrective action when they witness any unsafe act.

Safety and Health Committees (corporate)

- Why did you decide on a safety and health committee?

After inspection of one of our mechanical shops in April of 1998, it was suggested that a committee be formed to not only to track the concerns noted during the inspection but also to get the employees involved in the corrections.

Subsequently the director of safety, environmental manager, president and our insurance risk manager met with OSHA to review the benefits of such a committee at the firm.

From this meeting, the principals of the firm met and decided that the formation of a safety committee should go forward.

- When was it formed?

The safety committee was formed in August of 1998 the day after meeting with OSHA to discuss the likely structure of the new committee.

- How were employees selected and what are the service requirements?

Each employee was contacted by a mailing on July 24, 1998 that outlined how the committee would work and soliciting volunteers. Several of our vendors were also contacted should they wish to participate.

- How are the meetings presented?

- Meetings are held monthly near our corporate office in Troy, NY
- An agenda is built from issues raised between meetings
- Minutes are kept and sent to each member after each meeting
- Every quarter a speaker is invited to discuss timely topics with the group. During this meeting, the agenda is condensed to allow time for the presentation.
- Members are paid to attend including travel time to their jobsite afterwards.
- Though efforts are made to get each committee member to every meeting, schedules do not always allow full participation
- Present at each meeting are either the president or vice president of the firm
- In almost all cases, a representative from OSHA is present
- New Business, Old Business and Good of the Organization are agenda items, Roberts Rules for voting etc. are generally followed.
- After the agenda has been completed, the floor is open to items for discussion and any near misses or accidents reported are reviewed by all.

- What is the committees' role in?

Site inspections

The safety director or environmental manager completes the majority of the site inspections for the firm. If a safety committee member is available, he or she will be asked to accompany the inspector. However, due to the nature of the business, this cannot always be accomplished.

Accident Investigations

Three members of the SC have been trained in accident investigations by the National Safety Council (ASSE Baltimore 1999) and complete the investigations as directed by the safety director. Prior to this training, the environmental manager, also a SC member performed such investigations. An example of some corrections resulting from an investigation is attached.

Hazard Notification

During the SC meetings any hazards that are noted are discussed and methods for getting this information to the field are decided. Early on in the SC formation it was agreed that members would be the prime method of getting this useful information to the field. Typically the SC member will present what he has learned to his fellow workers during toolbox talks.

Rifenburg also has a confidential 800 number for safety concerns that is controlled by the safety director.

- What training has been offered to committee members

Aside from the accident investigation training, many members of the committee have been trained in confined space entry, fall protection, excavation safety, lock-out tagout, industrial hygiene, radiation safety and Mine Safety and Health Administration fundamentals.

The majority of the training was garnered as many members took the OSHA 40 hour HAZWOPER training, competent person training and MSHA training for quarry operations.

In summary, each SC member has a great deal of experience in identifying situations that are unsafe. There was an early fear that these members would be the "rat squad" of the company in regard to safety. Now, it is generally understood by the entire firm that the SC members who are working on each project are a great safety conduit to the top.

Safety and Health Committees (on-site)

- Why did you decide on a safety and health committee?

Since this is the largest project that we are involved in to-date and to comply with the upcoming requirements of VPP, it was decided that we would run this site safety operations like a VPP project long before this application was started.

Since there are SC members devoted to this project, formation of a smaller unit was an easy task.

The members are :

Jim Wilcox, Wes Hood, Ken Barth, Ron Johnson, Heidi Englutt, Doug Bouge, Steve Eckman and Jody Pagorek, Donna Shave, NYSDOT and TJ Lyons.

- When was it formed?

The SC for the Rochester project was formed in August of 1999.

- How were employees selected and what are the service requirements?

Volunteers were solicited from the work crew. They are required to meet each week on Monday morning when two members do a site inspection. They are also required to attend the monthly VPP meetings with the corporate managers.

- How are the meetings presented?

The Monday meeting is a "let put our heads together" meeting with a specific outline on a wipe board of safety issues. A toolbox talk is also completed (supplied by the corporate office).

The monthly meeting is for everyone on the safety committee. The corporate safety person creates the agenda for this meeting and also allows for open discussion.

- What is the committees' role in:

Site inspections

A safety committee member from the corporate office, usually the safety director or environmental manager will walk or drive the site (its about nine miles long) with a member or the site SC. The findings are shared with the balance of the SC that also included a representative from the owner (NYSDOT). The findings are usually corrected immediately.

Accident Investigations

A member of the SC will investigate accidents. One member so trained is currently dedicated to the site.

Hazard Notification

From the start each site meeting has had a safety component. If an issue is raised by anyone in the field, it is discussed at the next meeting.

Communications of information to the field

We have developed a method of getting near misses and incidents submitted to the corporate office to each field office as a "lessons learned". This was initiated from SC suggestion. Items are faxed and posted on the project information board. The items are also discussed with supervisors and foreman as a heads up. If something happens in our North Carolina office, it will be shared with every Rifenburg project within the next few days.

Sharing near miss data has been a SC emphasis since its formation.

What training has been offered to committee members (on-site)

Since the on-site committee is a mix of operators, mechanics and supervisors their job is production orientated. However, every Rifenburg employee has the benefit of an annual refresher (Safety Day) offered by experts in various safety fields ranging from sling safety to John Tomich the Regional OSHA director. Supervisors and foreman also receive competent person training and most receive an additional 8-hours of OSHA HAZWOPER training that contains additional safety training relating to workplace exposures, instrument use etc.

Again, there would be few Rifenburg employees that could be classified as un-trained. It should be noted that we have spent about \$100,000 each year on safety at Rifenburg. This is not just the cost of pretty coffee cups telling you to "have a safe day".

WORKSITE ANALYSIS

Pre-use / Pre-Startup Analysis

- How are worksites inspected prior to operations to determine potential hazards or areas of concern?

During the preparation of the bid, the entire project is reviewed. During this project pre-bid visit, the safety implications are discussed and planned for. As an example, during a visit to this site, the presence of underground gasoline and natural gas lines was noted for this project. As a result, operations in these areas would take longer and additional parties (the utility owners) would need to be contacted.

A copy of the "site specific safety considerations" and "Task Hazard Analysis" compiled before the project started is attached.

After the award, each project is video taped to record pre-work site conditions. During this taping, any items of concern are also noted and passed along to the project manager.

**EXAMPLE OF PRE-SITE HAZARD
ANALYSIS
(attached)**

Comprehensive Surveys

- Who and how are surveys completed prior to a project start?

Usually at the request of the project manager the safety director is asked to review a worksite prior to operations. Either the director of safety or the environmental manager for the firm completes the actual survey.

- Are those completing these surveys qualified?

Yes. The safety director has received training in most construction related areas, including Hazwoper, Trench and Excavation, Confined Space, and has completed the OSHA 500 trainer courses. She also is a certified Mine Safety trainer and holds an MBA.

The environmental manager is an OHST and ASP with experience in industrial hygiene, hazardous materials and worksite operations.

Both of the above employees devote the majority of their time to safety for the firm.

Self Inspections

- How are the weekly inspections completed and by whom?

The on-site SC completes the weekly safety inspections either on their own or when a corporate safety person visits the project. Rifenburg uses a checklist but has found that an informal walkthrough and taking of notes is good approach. It is suspected that a checklist may lead to "rubber stamping" the inspection.

- How are the monthly inspections completed and by whom?

The environmental manager visits the site each month and conducts this inspection. The project manager accompanies the manager throughout the inspection and presents the findings to the SC at the conclusion of the inspection. Records are kept. They are informal but effective. It has been noted that keeping the safety effort for this site, informal and just another part of the project works well. The intent is that safety is just another component of the project completion. Any "hassles" associated with the safety effort will only get in the way.

- What method does Rifenburg use to make sure areas of concern are corrected?

Whoever completes the inspections is tasked with making sure someone is assigned to correct each problem. In most cases, the items from the previous inspection are reviewed before the next visit to ensure that any materials or training that might be needed have either been supplied or are underway.

One example for the Rochester project was lifting straps. During a recent inspection several were taken out of service immediately and replaced from stock at the site. However, since the stock was then depleted, it was important that more slings were available to ensure those in the field were being replaced. The slings that were taken out of service were then cut (failing section) and these sections were used for "show and tell" at the next toolbox talk.

- Who will be doing the quarterly inspections of the entire work site and how will this be recorded?

The quarterly inspections will be completed by the president, director of safety, environmental manager, the owner (NYSDOT), the regional DOT safety director, the entire safety committee (on-site) and representatives from any subcontractors working on the project.

The inspection will likely be completed after hours to limit disruption of the project and allow for full participation of the site workers. Two inspections will be completed using a split-team approach. When each team has completed their inspection the reports will be compared.

A log will be kept of the findings. The findings will be discussed prior to the end of the inspection effort and responsibilities and timetables for corrections agreed upon.

Routine Hazard Analysis

- How are job hazards analyzed to improve the safety of the operation?
This includes routine and non-routine tasks.

Hazard analysis as generally recognized is not used for this project though the value in the manufacturing trade is noted. On this project, during site inspection by the safety department, routine work, like water line installation, road surface preparation is reviewed. These are routine tasks that have been going in this firm for over 40 years. Plenty of lessons learned have molded into how the operations are completed. People do not stand in the swing zone; they don't ride on buckets out of the hole and knows enough to keep their hands out of trouble.

However, there are times when an inspection of routine operations is completed PPE, that should be used is not. In one case on this project, a trench shield was needed but nowhere around - though the device was available. This issue was immediately discussed with the project manager and did not re-occur. This is a case where production was not balanced against safety. The inspection got the guys back in line and helped emphasis what was expected.

- How will phase hazard analysis be completed and by whom?

At the monthly inspections, upcoming work activities, what subs might be on-site or coming, what the weather might be etc. will be reviewed and any plans made to ensure new hazards that might be put in place (bridge span erection) have been considered and engineered. The on-site SC will complete this phase analysis, record and post the findings.

- How are the results of analysis used to correct hazards, modify programs or further train employees?

Currently, near miss data, hazard analysis (what did we find) and injury reports are used to track annual trends. The type of training chosen results. If analysis find a reoccurring problem like the lack of hard hat use (a company policy) additional training and perhaps strengthening of the discipline policy would result.

For this project, trends for the site will be reviewed quarterly and corrections to procedures or programs made to reflect the findings.

Employee Reports of Hazards

- How can Rifenburg employees or its subcontractors report hazards at this worksite? Are the responses timely and how is this information shared?

In most cases, concerns are brought to the project superintendent. There is also an 800 number available for confidential or anonymous reporting. Often, during site inspections, employees come forward and share concerns with the inspector.

Information on how to report hazards will be offered through postings and a mailing to each of the subcontractors on the site later in October.

Any hazard reported would also be reviewed at the weekly safety committee meeting and the monthly full committee meeting.

- How are these corrections or responses tracked?

The hazards that are investigated will be tracked by the near miss database and the corrections posted. This database is the best tool in the firm for tracking of hazards and their corrections. This also includes unsafe actions. One example was an employee getting splashed and burned from a tar-pot. The incident was investigated, corrections suggested and the unit modified to ensure the accident could not reoccur. This was tracked on the near miss database.

Accident Investigations

- What system is in-place for investigation of accidents?

In July Rifenburg created, reviewed and accepted a Near Miss, Property Damage or Personal Injury Investigation Policy.

The entire policy is attached; pertinent sections are given here:

- What is the existing policy for investigating accidents, including the criteria for deciding what to investigate? Are near misses investigated?

(Excerpt from policy)

"An accident investigation **Will Be** initiated when the following conditions are met:

Incident - Near miss, unsafe condition or undesired event that had the potential to harm, damage property, halt production or result in a loss of resources to the firm.

- An incident that had the potential to injure someone
- Potential damage to equipment or structures exceeding \$1,000.00
- At the request of the near miss reporting party
- At the request of the president

Accident - Unplanned event, which caused injury or damage, typically proceeded by an unsafe act, condition or combination.

- Any damage to equipment or property exceeding \$1,000.00
- All utility strikes involving gas or electric
- If injuries result from the accident but did not require hospitalization (overnight)
- If injuries resulted from the accident and there is lost time

Investigations **Will Not** be initiated when:

- Advised by counsel (see Handling of Documents and Evidence)
- Advised by our Insurance provider
- Advised by the president

It is good business to keep our people and the public from getting hurt at any Rifenburg site from the main offices to each field operation. **The program purpose is prevention, not discipline."**

- How does Rifenburg share "lessons learned" from incidents?

(excerpt from policy)

"The core of the investigation process rests with the employee. Accidents and incidents must be reported promptly and the employee might provide insight on the occurrence and perhaps correction. Rifenburg encourages employees to share insights with management at any time to prevent future accidents. "

- If recommendations and corrections are made, how are they tracked?

(Excerpt from policy)

"2.0 RECCOMENDATIONS AND CORRECTIONS

CORRECTIVE ACTIONS FOR PRIMARY AND SECONDARY ROOT CAUSES

Specifically what should be done in an attempt to prevent a similar occurrence? Training, inspection, procedures, personal protective equipment etc.

2.1 RESPONSIBILITY FOR FOLLOWING UP REMEDIAL ACTIONS

Name who will be responsible for overseeing that the corrections are completed. If a supervisor or manager is responsible - name him or her.

2.2 CORRECTIVE ACTION PERIOD

Clearly state (with a date) when any required remediation must be done and how documentation of the tasks will be completed (training records etc.)"

Trend Analysis

What system does Rifenburg use to measure trends, how is this information used and how is it shared?

At the end of each year the near miss data, injury data and loss information is reviewed by the safety director and environmental manger and trends determined. This information is used in preparation of the annual training emphasis for all employees and to modify any programs that might be impacted.

At the annual safety day, where each Rifenburg employees is present, these trends are discussed as part of the fixed agenda. The same information is presented the NC employees.

HAZARD PREVENTION AND CONTROL

Professional Expertise

- Does Rifenburg use or employ certified professionals in identifying, preventing and controlling hazards? If so, who are they and what do they do to help?

Yes. TJ Lyons, the environmental manager has been a board certified Occupational Health and Safety Technologist since 1992 and a board certified Associated Safety Professional since 1993. He has also been certified as the radiation safety officer for the firm.

Mr. Joe Knapik, a Certified Industrial Hygienist (subcontracted) is also used as a resource for reviews of exposure data or to provide instruction.

Mr. Gary Tuthill, a state certified New York State Paramedic (subcontracted) is also used as a resource for training of employees in emergency first aid, blood borne pathogens and treatment of trauma should a workplace accident occur.

Donna Shave is an OSHA Construction Outreach Trainer and a Mine Safety and Health Administration Instructor, and is well versed in methods for identification, prevention and control of workplace hazards.

Skip Parry of Reliance Insurance, our loss control agent, is an expert in loss control and is used to provide exposure monitoring data like noise surveys and refreshment of CPR training for the employees.

- Are professional services available near the site and how are communications maintained?

Professional services at the site are limited to a testing center for the corporate drug and alcohol program. The balance of professional services comes from corporate support.

Safety and Health Rules

- What rules are in-place for employees, how are they enforced and how are the rules communicated to the employees and subcontractors at this and all sites?

Initial Hire - within the initial hiring package is an Employee Handbook that contains "safety rules, regulations and policy statements". This includes information on the progressive discipline policy. Also included is our drug testing consent form and drug-free workplace - Disciplinary Action Policy and our hazard communication policy. Also, a Hiring Agreement is required that verifies the employee has been advised of our policies. Four of the five items are safety performance based. This form must be signed prior to hiring.

Annually - Each year, copies of the Rifenburg Safety Program (about 220 pages) are also made available to employees. This includes a policy statement from the principals and copies of all safety-related programs or initiative for the firm.

For the Rochester job, each sub-contractor has or will receive a copy of our Safety Program. In addition, specific areas of concern on the project are emphasized by the issuing of one-page directives to everyone on the job site. A recent one was created for safe operations of trucks on the site. A copy is attached.

By the end of October, each subcontractor and employee will be advised that a library of the firm's safety documents will be created in the field office and that this material is available to anyone.

- Is positive reinforcement used as a tool? If so, give some examples?

Yes. In many cases a small infraction is dealt with by giving the employee one break. However, this is tempered with the warning that another infraction will be recorded as part of the three-strikes your out policy. It is apparent that approaching an employee with "hey, can you help me out here and put on your hat" is a better tool than "Gonna write you up!" But, there are cases where people are written up for poor safety performance, some are let go. In all cases, what *is expected* is always shared with the employee.

The reason for forming the safety committee came from an inspection of our main shop. There were numerous areas that needed correction and it was obvious that a group effort at correction would be the best answer. During a subsequent inspection (requested by the mechanics!) there were few problems remaining and these were corrected immediately. This approach gave the mechanics a great perspective on safety and how little work is needed to maintain a safe workplace compared to getting a workplace safe.

As a result of the effort in the shop, the inspector submitted an "atta boy" to the mechanic copied to the president of the firm. The president went out and got a gift certificate for the employee for his good work. Word of this spread quickly and the mechanic is now very proud of his shop and does not hesitate to ask for help.

Personal Protective Equipment (PPE)

- How is PPE chosen and distributed to the employees?

The safety department purchases equipment that has been generally accepted by the employees. They will surely complain if they are unhappy with the gear!

If one type of earplug causes complaints, the complainer has the opportunity to state what kind he would like from past experience and we get it. Stocks of safety equipment are kept in the corporate office and the field offices. This includes first aid kits, ear plugs, hard hats, safety glasses, gloves (Nitrile), spill kits, eye wash solution, confined space gear etc.

At a minimum on all jobs employees and our subs are required to wear a hard-hat, vest and work boots.

Written Respiratory Protection Program (Table of contents and last review attached)

Preventative Maintenance

Is there a system in-place for preventative maintenance of equipment and tools? What is used as a timetable for inspections etc.?

John Herrington the fleet manager uses a computer driven program to keep track of maintenance needs for the fleet. As an example, Rifenburg has over 50 trucks on the road each day at jobsites across New York. John takes this information and directs the ten Rifenburg mechanics to complete the preventative work (brakes, lube, etc.) as needed. Daily inspection reports are also filled out on each vehicle and sent to the central office so other items that need repairs are tracked.

On this project, there is a full time mechanic who is also a SC member.

Emergency Preparedness

- What does the company do in the area of evacuation drills and dealing with on-site emergencies?

On-site drills are not practical for the operations. However, considerable time is spent on dealing with on-site emergencies during annual training. This year a paramedic spoke to the supervisors and foreman on proper response to trauma. The majority of the managers, foreman and supervisors are trained in Community CPR and first aid. Proper care for patients is also discussed during annual training. This instruction ranges from how to deal with someone with heat stroke or exhaustion to proper immobilization of the head after a fall.

One of our main instructors, the environmental manager is also a NYS Certified First Responder and makes it a point to drill what needs to be done first and fast at every opportunity.

- What credible scenarios might be used for drill testing of emergency preparedness?

On this project there are portions of the project where natural gas and gasoline are buried. A mock response to a catastrophic release of either of these two products would be quite exciting and a good test.

Medical Programs

- How is the company's medical program integrated with safety and health efforts?

When hazards are suspected, they are investigated. Attached are examples of some air sampling that was completed this summer for poly aromatic hydrocarbons, fumes and dust on several crews. We worked with the CDC in outlining the sampling protocols and shared the results with them. The monitoring was conducted in response to a NIOSH paper on the potential health effects from paving operations.

- What is available on-site in regard to first aid, CPR or other EMS training? What levels of training do the employees have and what training is given? Who provides this training and when?

Standard First aid and Adult CPR training is offered to all Superintendents and Foreman in an effort to insure that ample emergency care is available at every jobsite. This year's training was facilitated by Reliance Insurance, as a client service. American Red Cross instruction was given to employees in both North Carolina and New York. The list of trained employees is reviewed annually, and people with expiring certifications are scheduled to receive refresher

- Are occupational health professionals involved in hazard assessments, treating of injuries, limiting the severity of harm and managing injury and illness cases?

We are currently working with our insurance carrier to administer a managed care program which would include the utilization of occupational health professionals to evaluate both injured employees and job task methods.

Specific Occupational Safety and Health Programs

- What programs are currently in placed at Rifenburg?

Respiratory Protection

Bloodborne Pathogens

Fall Protection

Confined Space

Hazard Communications

Lock-out Tag-out

Lead Protection

Noise Exposure

Radiation Safety

Excavation and Trenching

TRAINING

Employees

- What training programs are used (formal and informal) for employees to recognize hazards that are related to what they do?

Several programs are used to present training specific for a project or task:

New hire - New hires receive a copy of our safety handbook with the initial information packet. Training over the first few days is completed by hooking up the new hire with an experienced crewmember. Rifenburg is now in the midst of creating a policy to ensure new hires are routed through the main office for a mandatory session with the safety director or designee to go over how we do the safety business.

Due later this fall is a video we are in the midst of producing, that reviews all the our existing safety programs, what we expect for PPE and gives examples of safe and unsafe actions. The beginning of the video includes a welcome from the president to let the new guy know - safety matters.

Site specific - Presented on-site to detail specific hazards, like contaminants they might encounter or special hazards like unanticipated buried items.

Annual Refreshers - Presented to the majority of the work force for OSHA 1910.120. During the delivery of the information, areas are expanded on based on workplace history. As an example, there was an emphasis on recognition and reaction to heat related injuries last year.

Safety Day - A favorite day for everyone (free lunch) the entire work force attends this 8 hour session on workplace safety. Hazard recognition training is offered by vendor (lifting tackle inspections) professionals (what is a confined space) managers, and others. This gives the whole workforce an idea of when they might put themselves in danger.

Super and Foreman - These team leaders are trained to be competent persons in several areas like excavation and confined spaces. This is an 8-hour day that goes into the standard, what makes you competent and how to recognize hazards that might pop up.

Outside Training - Managers also take course at their discretion in areas that impact them. Training on lead, accident investigation, mine safety, fork truck safety and fleet safety are some of the courses that are attended by staff.

- How often are courses evaluated and updated?

The agenda for in-house presented courses are created by the director of safety and the environmental manager. Topics are chosen to either emphasize a new standard or provide a review on what may have been presented to the student in the past. The presentations take into account the students level of learning and in some cases the inability of the student to read.

At the end of each course, an evaluation sheet on the material is usually completed by each student. The instructors review these after the course and any modifications made to the presentation.

- How do you make sure the employees understand and retain the training?

Jeopardy! Over the years, a review of the topics is read aloud using the Jeopardy format. It is fun, easy for the non-reader to participate in and lets the groups work as teams.

- How are training records kept and by who?

The director of safety retains all training records.

- How frequent is employee training and what prompts repeat or extra training?

As stated earlier, toolbox talks are given each week on a wide variety of topics from cold weather concerns to working in traffic. Employee training is also given annually during Safety Day and the annual refreshers for OSHA and MSHA.

In some cases, extra training is provided immediately. In a case last year, a near miss resulted in the entire work sites workforce, including subcontractors to receive additional training from an expert in fleet truck operations. Rifenburg prompted this mandatory training, as a step in correcting the near miss incident.

Supervisors

- What training is given to supervisors both formal and informal?

Supervisors receive annual training on topics ranging from completing employee evaluations to progressive discipline techniques. This is a one-day course presented by in-house staff (supervisors and managers) when possible and some outside speakers.

During the annual employee evaluations, if a specific area of training is requested, that training is made available at no charge to the supervisor. Since this is the first year of true, annual evaluations, this work is underway.

Managers

- How are top level managers trained in their safety and health responsibilities?

The corporate safety staff tries its best to work with the managers on safety issues as often as possible. If a site inspection is made, the manager is part of it. Though the managers may not be as well versed on safety as the corporate staff, they are the most knowledgeable among the supervisory staff. They know what should be done to do it safely. It is also up to them to share this knowledge with the supervisors.

Both Supervisors and managers are also sent to the AGC Technical Meetings held each December in the Albany area and to the Construction Exposition in Las Vegas each year. They are allowed to bring along a spouse for the trip, all paid by the firm. Technical and safety issues are popular seminars attended in Las Vegas.