# **LPDOCSA**

## ASSOCIATES, INC. GENERAL CONTRACTORS



Updated:

3/17/2017

### Safety & Health Policy/Accident Prevention Program

POLICY STATEMENT: L.D. Docsa Associates, Inc. considers no phase of its operation more important than safety and health protection. We will provide and maintain safe and healthful working conditions and establish and insist upon safe work methods and practices at all times.

Safety and health shall be an integral part of all operations including planning, development, production, administration, sales and transportation. Accidents have no place in our company. We will work to consistently maintain safe and healthful working conditions, to adhere to proper operating practices and procedures designed to prevent injury and illness, and to observe Federal, State, Local and Company safety and health regulations.

Each level of management must reflect an interest in company safety and health objectives and is required to set a good example by always observing the rules as a part of their normal work routine. Management interest must be vocal, visible and continuous, from top management to departmental supervisors.

All employees are expected to follow safe working practices, obey rules and regulations and to work in a way, which maintains the high safety and health standards developed and sanctioned by the company. We require all employees to make our safety and health program an integral part of their daily operations.

#### SAFETY & HEALTH POLICY/ACCIDENT PREVENTION PROGRAM

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#### SAFETY AND HEALTH MANAGEMENT SYSTEM

Establishment Name: L.D. Docsa Associates, Inc.

Address: 300 S. 8th Street

City: Kalamazoo, MI 49009

Phone: 269-349-7675

Type of Business: General Contractor

Email: info@lddocsa.com

Chief Executive Officer:	David L. Docsa, P.E
President	Jason Docsa, P.E.
Vice President	Scott DeVoll
General Superintendent	Jeff Lovell
Employer Safety and Health Representative:	Kris Alderman
Equipment Manager:	Kris Alderman

#### MODIFICATIONS/UPDATES

#### Review and Approval

This document has been updated on 1-1-2017 and implemented into action on March 31, 2017. These revisions have been reviewed and approved by the following:

David L. Docsa, P.E., Chairman of the Board	
Jason Docsa, P.E., President	
Scott DeVoll, Vice President	
Jeff Lovell, General Superintendent	
Kris Alderman, Safety Manager	

#### **Update Process/Procedures**

Upon updating this document, it is imperative this document be replaced and/or distributed in accordance with the following:

- Create updated Safety Policy & Procedures folder with date as noted above and save
- Incorporate changes into new employee packet distribution process
- Distribute inner office and to all project superintendents for implementation

#### MANAGEMENT COMMITMENT AND PLANNING

The organization's culture can directly influence the success of the safety and health management system. Our management will play a major role to ensure its success. Management commitment requires managing safety and health like other organizational concerns, integrating safety and health into the entire organization, becoming personally involved and establishing accountability for safety and health at all levels in the organization.

It is the intent of L.D. Docsa Associates, Inc. to furnish each employee employment, which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to such employee. The following guidelines will be utilized and enforced:

- L. D. Docsa Associates, Inc. shall not knowingly permit an employee to work while under the influence of intoxicating beverages or substances that impairs the employee's ability to perform a task in a safe manner.
- L. D. Docsa Associates, Inc. will inspect all machines, tools and equipment's on a regular basis to make certain that no defect is present that will affect the safety of employees.
- All employees' complaints or concerns regarding safety shall be immediately brought to the attention of the Safety Manager.
- Periodic meetings will be held to inform all employees of the company safety program.
- Continual training of all employees is required.
- Employer will enforce a disciplinary system to employees in violation of safety procedures.
- L.D. Docsa Associates, Inc., in an attempt to use accepted safety standards, has adopted both the MIOSHA Construction Safety Standards and MIOSHA Construction Health Standards, as well as the Army Corps of Engineers EM385 by reference.

#### SAFETY AND HEALTH POLICY STATEMENT

L.D. Docsa Associates, Inc. considers no phase of its operation more important than safety and health protection. We will provide and maintain safe and healthful working conditions and establish and insist upon safe work methods and practices at all times.

Safety and health shall be an integral part of all operations including planning, development, production, administration, sales and transportation. Accidents have no place in our company. We will work to consistently maintain safe and healthful working conditions, to adhere to proper operating practices and procedures designed to prevent injury and illness, and to observe Federal, State, Local and Company safety and health regulations.

Each level of management must reflect an interest in company safety and health objectives and is required to set a good example by always observing the rules as a part of their normal work routine. Management interest must be vocal, visible and continuous, from top management to departmental supervisors. All employees are expected to follow safe working practices, obey rules and regulations and to work in a way, which maintains the high safety and health standards developed and sanctioned by the company.

We require all employees to make our safety and health program an integral part of their daily operations.

#### GOALS AND OBJECTIVES

Corporate Motto "Everyone Goes Home Safe"

Goal: Provide a comprehensive program to assess and prevent or control all hazards Objective: Increase Employee involvement in job site safety assessment and control.

#### **EMPLOYEE HANDBOOK STATEMENT**

Carelessness breeds injury. Poor health or injury can break-up your home and/or future. To protect yourself and those around you, you are asked to cooperate fully by observing rules at all times.

L.D. Docsa employees will follow all guidelines set by OSHA, MIOSHA, ACOE EM385 and the L.D. Docsa Associates, Inc., Job Site Safety Manual. As noted in the Safety Policy violations of safety rules will be documented and placed in employee files.

It is the Policy of this company to maintain a safe and healthful workplace. The company has implemented a Safety Program to help further this policy. (See the LD Docsa Associates Safety Manual).

Employee safety is of utmost importance to the company. Any unsafe or hazardous working condition (whether involving a company employee or another entity's) should be brought immediately to the attention of your supervisor.

Safety and health involves individual responsibility on the part of every employee. The company expects all employees to constantly be aware of any action or condition, which is or might be unsafe, unhealthy or careless, and to act and work in a safe manner, and watch out for each other, as well as subcontractors.

**Never allow an accident to go unreported.** If you are injured on the job, regardless of how slight the injury may appear to be, report it promptly to your supervisor. Any injuries of a serious nature must be handled at once by the nearest immediate care facility. Treatment of alleged injuries at a later time may not be covered by Worker's Compensation and the employee may be responsible for the medical charges.

#### PROGRAM RESPONSIBILITY AND AUTHORITY

#### SAFETY AND HEALTH COMMITTEE

L. D. Docsa Associates, Inc. designates a Safety Committee to be responsible for the development and implementation of the Company's safety program. When practical, employees of L. D. Docsa Associates, Inc. will participate in safety seminars.

Then the total elimination of accidents and injuries will become not just an objective, but also a way of life. L.D. Docsa Associates, Inc. uses the company wide structure noted in this safety plan to maintain accountability for safety. The company safety officer monitors and trains employees in safe work practices and reports directly to the President. The enclosed safety violation procedure and forms are used by the project supervision to enforce the safety rules for each project. Each project supervisor as well as the General Superintendent, Safety Manager, and Project Manager have the full authority to stop work on each site if safety rules are not maintained.

Our committee will be comprised of management and employee representatives. Our committee will meet quarterly and yearly to review safety standards and procedures.

The committee will:

- Have defined goals and objectives.
- Address safety and health issues.
- Record and post minutes of the meetings.
- Involve employees in problem solving.

- Document action taken and post on the bulletin boards for all employees to read and/or comment.
- Have a formal agenda.

#### PROGRAM MANAGER

The Safety Manager acts as the competent person for L.D. Docsa Associates, Inc. in reference to this program. It is the responsibility of our Safety Manager to coordinate, implement, and administer L.D. Docsa Associates, Inc.'s safety and health system. Responsibilities include:

- The procedures described in this program are followed.
- Conduct or facilitate safety and health training.
- Serve as a safety and health staff resource for supervisors and employees.
- Accompany work site managers on all regulatory inspections (e.g., MIOSHA, Fire Inspector, etc.)
- Instruct each employee regarding operating procedures, hazards and safeguards of tools and equipment when necessary to perform the job.
- Inspect the construction-site; tools and equipment to assure unsafe conditions that may create a hazard are eliminated.
- Instruct each employee in the recognition and avoidance of hazards.
- Instruct each employee, where known harmful plants, reptiles, animals or insects are present, as to the potential hazards, how to avoid injury, and applicable first aid procedures to be used in the event of an injury.
- Instruct each employee required to handle or use known poisons, toxic materials, caustics and other harmful substances regarding the potential hazards, safe handling, use, personal hygiene, protective measures required and applicable first aid procedures to be used in the event of injury.
- Instruct each employee required to enter a confined space regarding the hazards involved, the necessary precautions to be taken, the use of personal protective equipment, and the procedures to be followed if an emergency occurs.
- Instruct all employees in the steps to be taken in case of an injury or accident.
- All required inspections, tests, and record keeping functions have been performed.
- Being knowledgeable of potential job hazards.
- Ensuring compliance with MIOSHA construction safety and health standard requirements.
- Making regular safety inspections and auditing project sites.
- Establishing safety procedures.
- Correlating regular safety training with lead persons.
- Maintaining safety records.

#### **EMPLOYEES**

All employees, including contractor personnel, who work in or around job-site, must comply with the requirements of this program. Employees are responsible for reporting hazardous practices or situations to L.D. Docsa Associates,

Inc. management, as well as reporting incidents that cause injury to themselves or other employees to the Safety Manager.

#### SITE SPECIFIC

#### Supervisor

Our supervisor's attitude plays an important part in obtaining or preventing the acceptance of safe and healthful work practices, policies, and procedures. It is the supervisor's responsibility to identify potential hazards, identify methods to control or eliminate the hazards, ensure employees engage in safe and healthful work practices, and ensure employees receive safety and health training to do their work. Safety and health performance will be part of our supervisor's evaluation.

The on-site Superintendent will be on-site while work is on-going. He/she will report directly to the General Superintendent, Corporate Safety Director and President/Vice President of L.D. Docsa. He/she will have full authority to stop work if unsafe conditions arise. He will be charged with following tasks to ensure safety compliance and a safe work site. (Note, this is not intended to be an exhaustive list.)

- Safety on-boarding of new employees to their specific site.
- Safety orientations for every new subcontractor on-site.
- Daily Tool Box Talk/JSA meeting with entire site team.
- Weekly Safety Audit recording near misses and deficiencies are resolved.
- Continuous safety inspections of the site while work is on-going.
- Hazard analysis review for each new task and review with the crew performing the work.
- Safety inspections of equipment, tools, etc. on-site.
- Make sure safety signage, posters, and promotions, are visible to site employees.
- Fostering a safety culture in conjunction with the President and Safety Director of L.D. Docsa.
- Maintain documentation on safety inspections, deficiencies, etc.

#### ACCIDENT REPORTING CONTACT ORDER

Accidents incurred on the job site must be reported according to the following order:

Site Employee/Worker → Superintendent → General Superintendent → Safety Manager & Project Manager → Vice President & President → Chairman of the Board

#### POLICIES, PROCEDURES, SAFETY & HEALTH RULES

#### **ADDITIONAL PROCEDURE POLICIES**

Our management is responsible for implementing major decisions, policies and safety and health procedures. Specific safety and health procedures that are required by MIOSHA will be put in writing, including, but not limited to:

- Confined Space Policy and Procedures
- Respiratory Program
- Crane, Sling and Hoist Policy and Procedures (All cranes will maintain this document along with owner's manual)
- Excavation, trenching and shoring policies and procedures (All equipment will maintain this document along with the owner's manual)
- Fall protection policy and procedures
- Written hazard communication and chemical safety policy and procedures
- Control of Hazardous Energy (Lockout-Tagout) Policy and Procedures
- Crystalline Silica Protection Program

Copies of these written programs are available on-site and at the main office. Written safety and health rules, and required MIOSHA posters, will be posted on-site and communicated with all employees. These rules will be enforced and followed by everyone at our facility.

#### PERSONAL PROTECTIVE EQUIPMENT

General requirements for Personal Protective Equipment (PPE) are as follows.

- Head protection is mandatory, and will be worn on job sites at all times.
- Eye protection is mandatory, and will be worn on the job site at all times.
- Protective footwear in the form of hard toe boots is mandatory, and shall be warn to protect from falling objects, chemicals, or stepping on sharp objects.
- Protective gloves shall be worn when required to protect against a hazard.
- Harnesses and lanyards shall be utilized for fall protection as required in MIOSHA Construction Safety Standards.
- High visibility clothing is recommended to be worn to increase the visibility of the worker.

A more detailed policy and procedure is available for review at any time. This document can be found with each Site Superintendent, Safety Manager, and in the L.D. Docsa Associates, Inc. main office.

#### MICHIGAN RIGHT TO KNOW

The Michigan Occupational Safety and Health Act (MIOSHA) has been amended to include requirements for the communication of information regarding the safe handling of hazardous chemicals present in Michigan workplaces. These amendments are known as the Michigan Right To Know Law.

The law requires a communication program designed to safeguard the handling of hazardous chemicals through labeling of chemical containers, development and availability of Material Safety Data Sheets, the training of employees working with these chemicals and a written hazard communication program developed by the employer.

The law also provides for specific employee rights. They include: 1) the right to be notified (by employer posting) of the location of Material Safety Data Sheets (MSDS); 2) the right to be notified (by employer posting) of new or

revised MSDS no later than five (5) working days after receipt; 3) and that employees have the right to request MSDS(s) from their employers.

Employees are afforded protection from any discrimination or discharge resulting from the request for information regarding hazardous chemicals under the Right To Know Law.

#### **MSDS**

A copy of MSDS information sheets will be available on-site and also in the main office. Employees will not be discharged or discriminated against for exercising their rights including the request for information on hazardous chemicals.

Additional detailed information on this policy can be found in the Written Hazard Communication Program Policy and Procedures.

#### RULES/DISCIPLINE

#### Rules

All of our corporate safety rules must be followed at all times. Fail to do so will result in strict disciplinary action.

- 1) Keep your mind on your work at all times. No horseplay on the job. Injury or termination or both can be the result.
- 2) Personal safety equipment must be worn as prescribed for each job, such as: safety glasses for eye protection, hard hats at all times within the confines of the construction area, gloves when handling materials, safety shoes in the form of hard toe boots, and high visibility clothing or vest.
- 3) Precautions are necessary to prevent sunburn and to protect against burns from hot materials.
- 4) If any part of the body should come in contact with an acid or caustic substance, rush to the nearest water available and flush the affected part. Secure medical aid immediately.
- 5) Watch where you are walking don't run.
- 6) The use of illegal drugs or alcohol or being under the influence of the same on the project shall be cause for termination. Inform you supervisor if taking strong prescription drugs that warn against driving or using machinery.
- 7) Do not distract the attention of fellow workers. Do not engage in any act which would endanger another employee.
- 8) Sanitation facilities have been or will be provided for your use. Defacing or damaging these facilities is forbidden.
- 9) A good job is a clean job, and a clean job is the start of a safe job. Keep your working area free from rubbish and debris.
- 10) Do not use a compressor to blow dust or dirt from your clothes, hair or hands.
- 11) Never work aloft if you are afraid to do so, if you are subject to dizzy spells, or are apt to be nervous or sick.
- 12) Never move an injured person unless it is absolutely necessary. Further injury may result. Keep the injured as comfortable as possible and utilize job site first-aid equipment until an ambulance arrives.
- 13) Know where firefighting equipment is located and be trained on how to use it.

- 14) Lift correctly with legs, not the back. If the load is too heavy, GET HELP. Stay fit. Control your weight. Do stretching exercises. Approximately twenty percent of all construction related injuries result from lifting materials.
- 15) Nobody but the operator shall be allowed to ride on equipment unless proper seating is provided.
- 16) Do not use power tools and equipment until you have been properly instructed in the safe work methods and become authorized to use them.
- 17) Be sure that all guards are in place. Do not remove, displace, damage or destroy any safety device or safeguard furnished or provided for ruse on the job, nor interfere with the use thereof.
- 18) Do not enter an area which has been barricaded.
- 19) If you must work around heavy construction equipment, make sure operators can always see you. Barricades are required for cranes.
- 20) Never oil, lubricates, or fuel equipment while it is running or in motion.
- 21) Before servicing, repairing, or adjusting any powered too or piece of equipment, disconnect it, lock out the source of power, and tag it out.
- 22) Barricade danger areas. Guard rails or perimeter cables may be required.
- 23) Trenches over five feet deep must be shored or sloped as required. Keep out of trenches or cuts that have not been properly shored or sloped. Excavated or other material shall not be stored nearer than two feet from the edge of the excavation. Excavations less than five feet may also require cave in protection in some instances.
- 24) Use the "four and one" rule when using a ladder. One foot of base for every four feet of height.
- 25) Portable ladders in use shall be equipped with safety feet unless ladder is tied, blocked or otherwise secured. Step ladders shall not be used as a straight ladder.
- 26) Ladders must extend three feet above landing on roof for proper use.
- 27) Defective ladders must be properly tagged and removed from service.
- 28) Keep ladder bases free of debris, hoses, wires, materials, etc.
- 29) Build scaffolds according to manufacturers' recommendations and MIOSHA Construction Safety Standard Part 12 Scaffolding.
- 30) Scaffold planks shall be properly lapped, cleated or otherwise secured to prevent shifting.
- 31) Use only extension cords of the three-prong type. Use ground fault circuit interrupters at all times and when using tools in wet atmosphere (e.g. outdoors) or with any temporary power supply. Check the electrical grounding system daily.
- 32) The use of harnesses with safety lines when working from unprotected high places is mandatory. Always keep your line as tight as possible.
- 33) Never throw anything "overboard". Someone passing below may be seriously injured.
- 34) Open fires are prohibited.
- 35) Know what emergency procedures have been established for your job site. (Location of emergency phone, first aid kit, fire extinguisher locations, evacuation plan, MSDS sheets, etc.)
- 36) Never enter a manhole, well, shaft, tunnel or other confined space which could possibly have a no respirable atmosphere because of lack of oxygen, or presence of toxic or flammable gas, or has a possibility of engulfment by solids or liquids. Make certain a qualified person tests the confined area with

an appropriate detector before entry, that the necessary safety equipment is worn. Standby person may be required to be stationed at the entrance.

#### Discipline

The following will be enforced for any violations of the company safety policy:

FIRST VIOLATION: WRITTEN NOTICE IN EMPLOYEE FILE (RETAINED FOR ONE YEAR AND THEN REMOVED); SUSPENDED FOR

ONE (1) DAY WITHOUT PAY.

SECOND VIOLATION: IF VIOLATION IS WITHIN ONE (1) YEAR OF THE FIRST VIOLATION, SUSPENDED FOR ONE (1) WEEK

WITHOUT PAY.

THIRD VIOLATION: IF VIOLATION WITHIN ONE (1) YEAR OF THE SECOND VIOLATION, DISCHARGE.

#### **EMPLOYEE INVOLVEMENT**

#### SAFETY INSPECTIONS

Our employees will participate in regular safety and health inspections (<u>Weekly/Monthly/Quarterly</u>) to help identify potentially hazardous conditions and unsafe actions and initiate corrections. Findings will be presented to the Safety Manager for review. Corrective action will be implemented under the direction of the Safety Manager in a timely manner.

A record of all safety inspections and correctional steps will be kept. Additional information on this portion of our policy can be found under "Worksite Analysis".

#### SUGGESTION SYSTEM

Our employees are encouraged to make safety and health suggestions to help improve a process, prevent an accident, or to make any improvement in the safety and health system. The suggestion system will be implemented by the Safety Manager, who will be responsible for determining priority and the proper means of implementation. Safety suggestions will be shared with the safety and health committee for input.

#### **EMPLOYEE PARTICIPATION**

Our employees are encouraged to provide input regarding recommendations on safety and health products, procedures, and training as it pertains to daily work operations. For example, employees may be given some responsibility to test out products or conduct research to substantiate recommendations. Employee input may be provided through the suggestion system, report of hazard, or through actions the safety and health committee initiates. Employees may participate in a variety of ways such as; a trainer, inspector, or problem solver.

#### **WORKSITE ANALYSIS**

We will conduct a worksite analysis, through systematic actions that provide information as needed to recognize and understand the hazards and potential hazards of our workplace. Listed below are types of worksite analysis actions that can assist with making an inventory of potential hazards in our workplace:

- Comprehensive hazard surveys (insurance inspections, MIOSHA On-site, etc.).
- Hazard analysis of changes in the workplace (new equipment, new processes).
- Regular site safety and health inspections (employee and management).

- Employee report of hazards or potential hazards.
- Accident and incident investigations with corrective actions and follow-up.
- Injury and illness trend analysis.
- Personal protective equipment assessment.
- Job safety analysis.
- Ergonomic analysis.
- Specific identification of confined spaces.
- Identification of energy sources for specific machines.
- Copies of written inspections and surveys by: fire department, in-house as required by safety and health standards (e.g., overhead crane inspections, powered industrial truck daily inspection, etc.).

#### NEW EQUIPMENT, PROCESSES AND FACILITY HAZARD ANALYSIS

On-site Superintendent in conjunction with Safety Manager will analyze new facilities, equipment, processes, and materials for hazards and potential hazards. Findings will be documented and plans developed to minimize or design out the hazards.

#### JOB SAFETY ANALYSIS (JSA) AND PPE ASSESSMENT

The main purpose of our JSA is to prevent accidents by anticipating and eliminating hazards. The Safety Manager will periodically perform the JSAs and personal protective equipment assessments to assure the appropriate safeguards and protection are in place and to develop safe work practices and procedures. When JSAs and personal protective equipment assessment are performed, employees will be involved in the process.

#### **EMPLOYEE REPORT OF HAZARDS**

Our employees play a key role in identifying, controlling, and reporting hazards that may occur or already exist in the workplace. Employee reports of potential hazards can be an effective tool to trigger a closer look at a piece of equipment, operation, or how work is being performed. Reports of potential hazards can also provide suggestions to eliminate a hazard.

#### RESPONDING TO SAFETY AND HEALTH ISSUES

We will conduct an investigation for all accidents/incidents and near misses. Our primary goal of conducting an investigation is to determine the "root cause" to prevent the risk of a future occurrence. Investigation reports can help determine injury and illness trends over time, so that patterns with common causes can be identified and prevented. Investigations are not intended to place blame.

Accidents and "near-miss" incidents will be investigated by on-site Superintendent and Safety Manager. The reports will be reviewed by a designated person from the Safety Committee within 24 hours of an accident/incident.

#### **Accident/Incident Investigation**

Our management will take prompt consistent action when responding to safety and health issues. They will demonstrate our commitment to addressing safety and health concerns and encourage employee participation. Management will respond to employees' reports of hazards or potential hazards as submitted.

Immediate supervisors will review, investigate, and take any necessary and appropriate action on all employee report of hazards or potential hazards. The employee reporting the hazard or potential hazard will be notified of the outcome. Reporting of hazards or potential hazards will be without fear of reprimand.

#### **Emergency Response Program**

As part of its safety program, it is the policy of L.D. Docsa Associates, Inc., to make certain that all employees have been instructed as to proper procedures in case of an injury or accident.

A list of emergency phone numbers will be posted at the job site when practical. If no suitable or convenient location exists, the list will be kept by the supervisor. All employees will have their supervisor's phone number. The supervisor will hold a copy of an Emergency Phone Numbers list, distributed by the office. It is important to call 9-1-1 first, when necessary. All employees shall refer to the list of emergency numbers if medical attention or emergency rescue operations are required beyond that which cannot be performed by the employees of L.D. Docsa Associates, Inc. All accidents and/or injuries shall be report to the office and the Safety Manager immediately.

#### **TRAINING**

Our management will develop systems to prevent and control hazards. These include: the establishment of controls through engineering, work practice, personal protective equipment, and/or administrative actions; systems to track hazard correction; preventive maintenance systems; emergency preparation; and medical program. Copies of applicable MIOSHA standards will be held in the main office for employee review or can be viewed on line at www.michigan.gov/mioshastandards.

Our written system will be implemented to assure guards, housekeeping, and personal protective equipment are being used. A written plan of action for the correction of hazards found in the workplace will be implemented by the Safety Manager. Actions will be communicated to all employees. A machine-specific maintenance schedule will be established by the Equipment Manager. Maintenance logs will be kept to document work performed and repairs scheduled or ordered.

Our supervisors will correct and reinforce safe and healthy work practices as part of their daily routine. Our written disciplinary procedure will assist in fair and consistent enforcement, and will include remedies and follow-up. Through a team effort all employees at L.D. Docsa Associates, Inc. will make "safety checks" a part of routine work practices.

#### SAFETY AND HEALTH TRAINING

Our goal of safety and health training is to provide a mechanism for our employees to understand safety and health hazards and how to protect themselves and others. Safety and health training programs include determining the training needs, involving our employees in the program design, and implementing the training.

Our training should be designed for the type of work and potential hazards employees may be exposed to. All construction-site workers will be required to have the proper training for their working conditions. Our employee training will be documented and reviewed as necessary to ensure consistent safe and healthful work practices.

#### Training will be Conducted

- Immediately for new employees, and at 90 day review.
- Yearly for current employees.

- When required by a specific standard, equipment, or procedure.
- When new methods are developed or changed.
- When an employee's responsibilities or designated job duties change.
- When a pattern of unsafe or unhealthy behaviors are observed.
- When an employee shows a deficiency in knowledge of a company rule and procedure.
- When new hazards are identified, new controls are implemented or personal protective equipment is provided.
- When a specific health standard such as: asbestos, benzene, lead, cadmium, ethylene oxide, formaldehyde, hexavalent chromium, and others mandate it.

#### **Training Records**

The records will be maintained by the Safety Manager. Training documents will include: who was trained, training subject, content, and date.

Our training schedules will follow, at a minimum, the training requirements of the MIOSHA standards. Our training shall consist of a combination of lecture, discussion, interactive computer learning, videotape, written materials, practical training and testing, or one-on-one (on the job) training.

#### **New Employee Training**

New employees are required to report to the L.D. Docsa office for basic and site specific safety training. This training will be conducted by the Safety Manager.

Training will include:

- Company Safety & Health Policy Handbook review
- Aerial lift and scissor lift training
- Harness donning and doffing
- Respirator fit testing
- Wellness form
- Drug screening

In addition, new employees will be required to complete a 10-hour OSHA training program at their 90 day review.

#### DOCUMENTATION/INFORMATION/LITERATURE

#### **Record Keeping**

L.D. Docsa will incorporate a daily (Tool Box Talk/JSA), weekly and monthly site specific safety audit. The daily report, as titled Tool Box Talk/JSA, will be completed by the on-site Superintendent, site engineer, or designated employee, and will focus on PPE as well as a specific daily topic in accordance with work to be performed. Along with a daily report, L.D. Docsa will also complete a more in depth weekly safety audit of the project site. This audit will also be performed by the on-site Superintendent, or site engineer. The Safety Manager will be responsible to complete a monthly safety audit, which will confirm daily and weekly audits have been completed. The Safety

Manager will also verify deficiencies have been resolved or are scheduled to be resolved. A copy of the report, signed-off by the Safety Manager, will also be included on-site.

All safety audits will be logged into Timberline, our project management software for audit tracking. Hard copies of the daily and weekly site safety audits will be available on-site in the safety report binder, as well as a copy of the monthly report, signed-off by the Safety Manager. An example of these forms can be found at the end of this plan.

#### Information/Literature

At construction-sites where a job site trailer is provided, L.D. Docsa will designate a reserved space for safety and health documents, memos, and safety and health committee minutes. In addition, L.D. Docsa will provide in job site trailers an emergency plan with the following information:

- Project Address
- Project Map
- Location of nearest Fire Department
- Location of nearest Hospital
- Designated Job Site Emergency Contact Person

L.D. Docsa will also post throughout the construction trailers safety signs and safety reminders for all visitors and fellow workers at the job site. Examples can be found at the end of this plan.

#### SAFETY AND HEALTH WORK OBSERVATIONS

L.D. Docsa implements a culture of safety every day. Safety and health work observations will be performed routinely by supervisors and follow workers. L.D. Docsa expects employees and subcontractors alike, to hold each other accountable for their actions, act as a team, and ensure EVERYONE GOES HOME SAFE.

#### FORM EXAMPLES

#### SAFETY VIOLATION DOCUMENT

#### L. D. DOCSA ASSOCIATES, INC.

#### SAFETY VIOLATION NOTICE THREE-STEP SYSTEM

First Violation:		notice in enday without		ained for one y	ear and then removed) - suspended fo	r
Second Violation:	If viola pay.	tion is within	one (1) year of	f the first violat	ion, suspended for one (1) week with	out
Third Violation:	If viola	tion within o	ne (1) year of th	ne second viola	tion, discharge.	
Employee:	J	Job Location			Site Supervisor:	
On	_(Date) at		(Time), you	were observed	l violating the safety regulations of	
MANUAL		PART or SECTION	RULE		DESCRIPTION	
LD Docsa Safety N	Ianual					
MIOSHA Safety Sta	andards					•
Corps of Engineers Safe Health Standard (Em-38						
Observed by:					se #: completed by home office)	

#### JOB SITE SAFETY AUDIT FORMS

#### Tool Box Talk/JSA



#### DAILY TBT/JSA

	TC	OL BO	X TAI	_K/JOB-S	SITE SAFETY	Y ANALY	SIS		
Project:			Dat	te:		Time:			
Reviewers Name:						Title:			
			To	ol Box Talk/D	Daily Activities				
Tool Box Talk Item:									
Daily Plan:									
				PPE REQUI	REMENTS				
Are all trades equippe	ed with the f	following and	l have agree	ed to wear the a	ppropriate PPE during	g work hours:			
		Yes No				_	Yes	No	N/A
Ear	protection					Hard toe boots			
Eye/Face	protection				High visi	bility shirt/vest			
	Hard hat								
Please note any defici	iencies in PP	E requireme	nts and rec	ognize need for a	additional PPE (i.e., gl	loves, fall protec	tion, respir	ator, etc.)	
				GENERAL SAI	FETY FOCUS				
Description	of Activity:								
	Ë	es No	N/A						
	ents Met?								
Deficiency	y(s) Noted:								
Res	solution(s):								
	_	_	_	CICNAT	TUDEC.				
Worker Acknowledge	ment of daily	y plan and sa	fety require	SIGNAT ements (SIGN-IN)					
J				· · ·					
Superintendent	_	OHEN				Date			
Juperintendent	orginature_	(A co	opy of this repo	rt must be sent to LDD	office, along with all requesti				

Page 1 of 1

#### **Weekly Safety Audit**



#### WEEKLY SAFETY AUDIT

Celebrating Our Past. Building Your Future.			WELKET 37	II E I I A	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	JOBSITE REPO	RT			
Project: Clemens WWTP	Date:	Time	:		
Reviewers Name: Alderman, Kris		Title	:		
Task Description:					
	COMPANY FOCUS				
	Yes No N/A				
Are weekly tool box talks be	aing done?	Tool box talk topic	:		
Two week look ahead schedule s	ubmitted?	Date submitted	:		
Lift and equipment operator card	is current?				
Company Safety Manual and SDS shee	ts on-site?	Location:			
	NEWLY ADDED EMPLO	YEES			
Name	Safety Training Date		Operators Cards:	Yes No	N/A
Were all trades on-site wearing all of the following require	PPE REQUIREMENTS	S			
Yes No N/A	chicho:	Yes No N/A			
Ear protection	Hard toe b		1		
Eye/Face protection	High visibility shirt	/vest	j		
Hard hat					
Please note any deficiencies in PPE requirements and reco	ognize need for additional PPE (i.e.,	gloves, fall protection, r	respirator, etc.)		
	MEDICAL	No N/A			
Are first-aid kits avail:	able and properly stocked?	Location.			
Are employees aware of site address/can of giving dire					
	e trained in first aid or CPR?				
Are all emergency phone nun	ivers posted and updated?	Location:			



#### **WEEKLY SAFETY AUDIT**

the state of the s	CENEDAL DO	OLECT FOCUS			
	GENERAL PR	OJECT FOCUS			
Manual Material Handling  Are mechanical devices being used in place of manual handling of material?	Yes No N/A	Are ropes, slings, chains, hook, cables and chokers in good condition?	Yes	No	N/A
Proper staging of materials to minimize lifting and carrying?		Rigging equipment inspected regularly and in good condition?			
Is the handling of bagged material limited to 50 lbs?		Are carrying handles being used when a single worker is carrying sheeted materials?			
Housekeeping: Slips, Trips and Falls	Yes No N/A		Yes	No	N/A
Are walking and working surfaces clear and free of debris?		Are walking and working surfaces clear and free of debris?			
Is adequate temporary lighting provided?		Are waste and trash containers provided, used?			
Is temporary storage of materials and supplies done in an organized fashion?		Does each trade clean-up after themselves?			
Fire Protection and Prevention	Yes No N/A		Yes	No	N/A
Are all flammable liquid containers clearly identified?		Are all flammable liquid containers UL or FM listed?			
Is ventilation adequate for temporary heaters?		Are extinguishers readily accessible and serviced?			
Have proper storage practices for flammables been observed?		Have gas cylinders been chained upright with valve caps securely fastened?			
Are hydrants clear and accessible for fire department personnel?		Are temporary heaters located at a safe distance from combustibles?			
Has there been proper segregation between flammable gasses?					
Electrical	Yes No N/A		Yes	No	N/A
Are all switch gear, panels and devices that are energized marked/guarded?		Lockout devices available/used on circuits that could be energized while being worked?			
Are all temporary circuits properly guarded and grounded?		Are extension cords in continuous lengths without splice?			
Are GFCI's and/or Assured Equipment Grounding Conductor Program being used?		If temporary lighting is provided, are bulbs protected against breakage?			
Are working surfaces clear of cords so as not to create a hazard?		Is there a sufficient number of temporary outlets on the job?			
		Any visual signs of outlet overloading?			
Hazard Communication	Yes No N/A		Yes	No	N/A
Is there a list of hazardous chemicals?		Container labeling?			
MSDS?		Posting?			
Excavation/Trenching	Yes No N/A		Yes	No	N/A
Have utility companies been notified of proposed work?		Are all tools, equipment, and shoring materials readily available prior to start up?			
Are overhead utility lines noted and precautions taken to avoid contact with equipment?		Is the spoil pile at least two feet from the edge of the excavation?			
Is the excavation inspected daily or more frequently when conditions could affect soil?		If needed, are barricades, stop logs, properly placed?			
Has soil classification been made by a competent person?		Are excavations five feet or deeper correctly sloped, benched, shored or is a trench box used?			
Is a ladder or other means of egress provided in trenches or excavations six feet or deeper?		When ladders are used, do they extend three feet above the surface and are they secured?			
Are shoring and shielding systems inspected daily by a competent person?		Is the trench backfilled as soon as work is completed?		Page :	2 of 4



#### **WEEKLY SAFETY AUDIT**

The same of the sa							
Barricading	Yes	No	N/A		Yes	No	N/A
Are floors openings planked and secured or barricaded?				Are direction signs used to inform the public of upcoming construction work?			
Is the sidewalk protection effective?				Is a flag person provided to direct traffic when needed?			
Has the person been trained on how to direct traffic and the public?				Are open excavation, road drop offs, manholes, uneven surfaces barricaded?			
Ladders	Yes	No	N/A		Yes	No	N/A
Is the proper ladder for the job being used?				Are ladders in good condition?			
Are there safety shoes/cleats on the bottom of ladders?				Do side rails extend 36" above top of landing?			
Are ladders tied-off at top or otherwise secured?	=		=	Are non-conductive ladders available for use around			
Rungs or cleats uniformly spaced 10-14" apart?				live wiring?			
Are step ladders fully open when in use?					_		
Tools: Hand and Power	Yes	No	N/A		Yes	No	N/A
Are tools free of any obvious physical damage?				Are double insulated tools in use and in good condition?			
Are tools and cords properly grounded (ground pins are in good condition?				Are all hoses on air or hydraulic tools in good condition?			
Are the handles on all tools in good condition (not				Operator qualified and instructed to use powder actuated tools?			
bent, splintered or broken)?				Are all shields and guards in place on the tools and in good condition?			
Welding and Cutting	Yes	No	N/A		Yes	No	N/A
Are non-combustible enclosure, (screens/shieds) provided and used when welding?				Welding goggles, gloves, and clothing being used by welder?			
Inspection for fire hazards after welding stops?				Are gas cylinder, hoses, regulators, torches, torch tips and welding carts, in good condition?			
Hoist, Cranes and Derricks	Yes	Mo	N/A		Yes	No	N/A
Are cables and sheaves checked?			197	Are slings, hooks, eyelets, chokes inspected?			
Are load capacities posted in cab?				Are power lines at a safe distance?			
Do cranes have proper barricades around swing radius?				Are crane inspection logs with crane?			
Floor, Wall Openings, Stairways	Yes	No	N/A		Yes	Mo	N/A
Floor and roof openings guarded by guardrails and toe boards or a secured cover?				Open-sided floors/platforms six feet or higher guarded with railing, toe boards or equivalent?			
Are stairs with four or more above ground properly guarded?				Anchor posts and framing capable of withstanding 200 lb. load in any direction?			
Scaffolding	Yes	No	N/A		Yes	No	N/A
Are scaffold components visibly free of any physical damage? (no bent supports or bracing)				Is scaffold properly erected with all pins and braces in place and locked?			
Are rolling scaffolds equipped with locking wheels?				Are wheels locked when scaffold is in use?			
Is scaffold erected on a firm and substantial surface?				Is planking of a scaffold grade?			
Planking in good condition and properly installed?				Are toe boards and guardrails in place on scaffolds over 10 feet.			
Are workers on scaffolding protected from falling objects if overhead hazards exist?				Ladder provided for access to scaffold work platform?			

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#### **WEEKLY SAFETY AUDIT**

Cereoratoly Oto Fast, Managing Foto Finare.		
	NEAR MISS/DEFICIENCY LOG	
NEAR MISSES		
Item	Reponsible Contractor	Action/Remedy
DEFICIENCIES		
DEFICIENCIES		
	Renonsible Contractor	Artion/Remedy
item	Reponsible Contractor	Action/Remedy
		Action/Remedy
	Reponsible Contractor  SIGNATURES	Action/Remedy
		Action/Remedy
		Action/Remedy

(A copy of this report must be sent to LDD office, along with all requesting parties)

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#### **Monthly Safety Audit**



#### MONTHLY SAFETY AUDIT

Celebrating Our Past. Building Your Future.		MONTHLY SAFETT AUDIT
	JOBSITE REPORT	
Project: Clemens WWTP	Date:	Time:
Reviewers Name: Alderman, Kris		Title:
Neviewers Name	_	nue.
	COMPANY FOCUS	
	Yes No N/A	
Are weekly tool box talks	s being done?	
Are lift and equipment operator of		
Company Safety Manual and SDS sh		
Is project Safety Sign maintained	and current?	
	NEWLY ADDED EMPLOYEES	
Name	Safety Training Date	Operators Cards: Yes No N/A
Nume	Sujety Truining Date	Operators Cards: Yes No N/A
Manager and Australia and Aust	PPE REQUIREMENTS	
Were all trades on-site wearing all of the following req Yes No N/A		No N/A
Ear protection	Hard toe boots	
Eye/Face protection	High visibility shirt/vest	
Hard hat		<b></b>
Please note any deficiencies in PPE requirements and r	recognize need for additional PPE (i.e., gloves, fall pro	tection, respirator, etc.)
	MEDICAL	
	Yes No N/A	
		Location:
Are employees aware of site address/can of giving d	firections to emergency crew?	
Is anyo	one trained in first aid or CPR?	
Are all emergency phone n	numbers posted and updated?	Location:



#### **MONTHLY SAFETY AUDIT**

GENERAL PROJECT FOCUS						
Manual Material Handling Are mechanical devices being used in place of manual handling of material?	Yes No	N/A	Are ropes, slings, chains, hook, cables and chokers in good condition?	Yes	No	N/A
Proper staging of materials to minimize lifting and carrying?			Rigging equipment inspected regularly and in good condition?			
Is the handling of bagged material limited to 50 lbs?			Are carrying handles being used when a single worker is carrying sheeted materials?			
Housekeeping: Slips, Trips and Falls	Yes No	N/A		Yes	No	N/A
Are walking and working surfaces clear and free of debris?			Are walking and working surfaces clear and free of debris?			
Is adequate temporary lighting provided?			Are waste and trash containers provided, used?			
Is temporary storage of materials and supplies done in an organized fashion?			Does each trade clean-up after themselves?			
Fire Protection and Prevention	Yes No	N/A		Yes	No	N/A
Are all flammable liquid containers clearly identified?			Are all flammable liquid containers UL or FM listed?			
Is ventilation adequate for temporary heaters?			Are extinguishers readily accessible and serviced?			
Have proper storage practices for flammables been observed?			Have gas cylinders been chained upright with valve caps securely fastened?			
Are hydrants clear and accessible for fire department personnel?			Are temporary heaters located at a safe distance from combustibles?			
Has there been proper segregation between flammable gasses?						
Electrical	Yes No	N/A		Yes	No	N/A
Are all switch gear, panels and devices that are energized marked/guarded?			Lockout devices available/used on circuits that could be energized while being worked?			
Are all temporary circuits properly guarded and grounded?			Are extension cords in continuous lengths without splice?			
Are GFCI's and/or Assured Equipment Grounding Conductor Program being used?			If temporary lighting is provided, are bulbs protected against breakage?			
Are working surfaces clear of cords so as not to create a hazard?			Is there a sufficient number of temporary outlets on the job?			
			Any visual signs of outlet overloading?			
Hazard Communication	Yes No	N/A		Yes	No	N/A
Is there a list of hazardous chemicals?			Container labeling?			
MSDS?			Posting?			
Excavation/Trenching	Yes No	N/A		Yes	No	N/A
Have utility companies been notified of proposed work?			Are all tools, equipment, and shoring materials readily available prior to start up?			
Are overhead utility lines noted and precautions taken to avoid contact with equipment?			Is the spoil pile at least two feet from the edge of the excavation?			
Is the excavation inspected daily or more frequently when conditions could affect soil?			If needed, are barricades, stop logs, properly placed?			
Has soil classification been made by a competent person?			Are excavations five feet or deeper correctly sloped, benched, shored or is a trench box used?			
Is a ladder or other means of egress provided in trenches or excavations six feet or deeper?			When ladders are used, do they extend three feet above the surface and are they secured?			
Are shoring and shielding systems inspected daily by a competent person?			Is the trench backfilled as soon as work is completed?			



#### **MONTHLY SAFETY AUDIT**

	17							
Barr	icading	Yes	No	N/A		Yes	No	N/A
	Are floors openings planked and secured or barricaded?				Are direction signs used to inform the public of upcoming construction work?			
	Is the sidewalk protection effective?				Is a flag person provided to direct traffic when needed?			
	Has the person been trained on how to direct traffic and the public?				Are open excavation, road drop offs, manholes, uneven surfaces barricaded?			
Ladders		Yes	No	N/A		Yes	No	N/A
	Is the proper ladder for the job being used?				Are ladders in good condition?			
	Are there safety shoes/cleats on the bottom of ladders?				Do side rails extend 36" above top of landing?			
	Are ladders tied-off at top or otherwise secured?				Are non-conductive ladders available for use around			
	Rungs or cleats uniformly spaced 10-14" apart?				live wiring?			
	Are step ladders fully open when in use?					_		
Too	ls: Hand and Power	Yes	No	N/A		Yes	No	N/A
	Are tools free of any obvious physical damage?				Are double insulated tools in use and in good condition?			
	Are tools and cords properly grounded (ground pins are in good condition?				Are all hoses on air or hydraulic tools in good condition?			
	Are the handles on all tools in good condition (not bent, splintered or broken)?				Operator qualified and instructed to use powder actuated tools?			
	bent, spilittered of broken):				Are all shields and guards in place on the tools and in good condition?			
Wel	ding and Cutting	Yes	No	N/A		Yes	No	N/A
	Are non-combustible enclosure, (screens/shieds) provided and used when welding?				Welding goggles, gloves, and clothing being used by welder?			
	Inspection for fire hazards after welding stops?				Are gas cylinder, hoses, regulators, torches, torch tips and welding carts, in good condition?			
Hoist, Cranes and Derricks		Yes	No	N/A		Yes	No	N/A
	Are cables and sheaves checked?				Are slings, hooks, eyelets, chokes inspected?			
	Are load capacities posted in cab?				Are power lines at a safe distance?			
	Do cranes have proper barricades around swing radius?				Are crane inspection logs with crane?			
Floor, Wall Openings, Stairways		Yes	No	N/A		Yes	No	N/A
	Floor and roof openings guarded by guardrails and toe boards or a secured cover?				Open-sided floors/platforms six feet or higher guarded with railing, toe boards or equivalent?			
	Are stairs with four or more above ground properly guarded?				Anchor posts and framing capable of withstanding 200 lb. load in any direction?			
Scaf	folding	Yes	No	N/A		Yes	No	N/A
	Are scaffold components visibly free of any physical damage? (no bent supports or bracing)				Is scaffold properly erected with all pins and braces in place and locked?			
	Are rolling scaffolds equipped with locking wheels?				Are wheels locked when scaffold is in use?			
	Is scaffold erected on a firm and substantial surface?				Is planking of a scaffold grade?			
	Planking in good condition and properly installed?				Are toe boards and guardrails in place on scaffolds over 10 feet.			
	Are workers on scaffolding protected from falling objects if overhead hazards exist?				Ladder provided for access to scaffold work platform?			

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#### MONTHLY SAFETY AUDIT

Ceremony on Fam. Manager and Fam.							
	RECAP	Yes No N	/A				
Has a review of the Safety Audit Log been completed?							
Were any required safety audit's (daily or weel	kly) missing from log?		7				
If yes, why were they missing?							
Are all DAILY audit reports completed, available for review							
Were any near misses or deficiencies noted on	DAILY audit reports?						
If yes, how many?			_				
If near misses or deficiencies were noted, have	they been resolved?						
If no, how many are still open?							
When will they be resolved?							
Are all WEEKLY audit reports completed, available for rev	iew?						
Were any near misses or deficiencies noted on	WEEKLY audit reports?						
If yes, how many?			_				
If near misses or deficiencies were noted, have	they been resolved?						
If no, how many are still open?							
When will they be resolved?							
Has a review of the Safety Audit Near Miss and Deficiency log been completed?							
NEAR M	ISS/DEFICIENCY LOG (fro	m this monthly audit)					
NEAR MISSES							
Item	Reponsible Cor	ntractor	Action/Remedy				
DEFICIENCIES							
	Barrarible Con		a sine france do				
Item	Reponsible Co	ntractor	Action/Remedy				
	SIGNATURE	S					
Superintendent Signature			Date				

(A copy of this report must be sent to LDD office, along with all requesting parties)

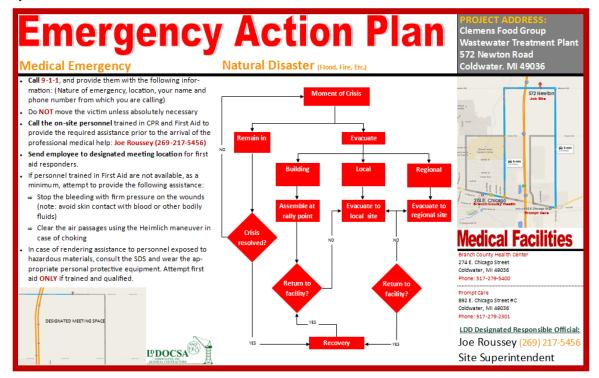
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#### JOB SITE POSTER/INFORMATION SHEETS

#### Michigan Right to Know Law



#### **Emergency Action Plan**



Jobsite Safety Sign (2'x4')

# safetyisfirst

**YOU HAVE OPTIONS!** Report **ALL** safety violations to your supervisor and/or management. If you desire, your information will be kept in strict confidentiality. **WE WANT TO KNOW!** 

## Everyone goes home safe

#### CONTACTS:

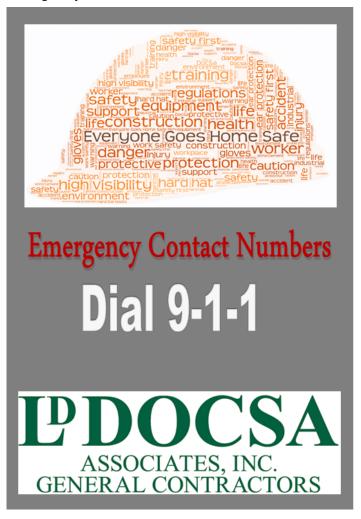
President (Jason Docsa—269-207-3723)

Safety Director (Kris Alderman—269-207-3722)

General Superintendent (Jeff Lovell—269-207-3716)



#### **Emergency Contact Numbers**



The following is a list of emergency contact phone numbers:

269-349-7675

**LDD Main Office** 

Kris Alderman, Safety Manager	269-207-3722
Jeff Lovell, General Superintendent	269-207-3716
Scott DeVoll, Vice President	269-217-5965
Jason Docsa, P.E., President	269-207-3723
Local Fire Department:	
Local Hospital:	
Local Police Station:	

All accidents are required to be reported to the LDD Office after the situation is managed.