

	ILLNESS / INJURY RECORDKEEPING	Document No.:	HSE-OP-047
		Department:	Operations
		Revision Date:	04 NOV 2011
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Purpose

The Incident Recording document provides a detailed description of the process associated with the administration, determination, and recording of Occupational Safety & Health Administration (OSHA) Recordable Incidents.

Scope

These procedures apply to Trinity business units, subsidiaries and contractors.

Responsibilities

The Operations Manager is responsible for implementation and administration of the Incident Recording Process at the corporate level and for maintaining and ensuring that the process is kept current with business needs.

The Operations Supervisor or his or her designee is responsible for the implementation, administration, and maintenance of the Incident Recording Process at the Worksite or PSL level.

A third party Recordkeeper is responsible for an independent assessment, classification, and recording of incidents.

Records

Trinity maintains records of employee training, hazard identification and abatement, and accident investigation.

OSHA Records Required

Copies of required accident investigations and certification of employee safety training will be maintained by the Operations Manager.

Trinity keeps records of its employee fatalities, injuries, and illnesses that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria of applicable regulations.

Each recordable injury or illness is entered on OSHA 300 Log of Work-Related Injuries and Illnesses, OSHA 301 Form (Injury and Illness Incident Report), and a separate, confidential list of privacy-concern cases, if any, within (7) calendar days of receiving information that a recordable injury or illness has occurred. The Operations Manager keeps these records up to date.

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If there is a privacy-concern case, we have the option to not enter the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses. Instead, the text "Privacy Case" is entered in the space normally used for the employee's name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative is provided access to the OSHA 300 Log. The company will keep a separate, confidential list of the case numbers and employee names for your privacy concern cases so that we can update the cases and provide the information to the government if asked to do so.

At the end of each calendar year, Operations Manager performs the following steps:

1. Reviews OSHA 300 Log of Work-Related Injuries and Illnesses to verify that the entries are complete and accurate,
2. Corrects any deficiencies identified in the entries,
3. Creates an annual summary of injuries and illnesses recorded on OSHA 300 Log of Work-Related Injuries and Illnesses,
4. Ensures that the Operations Manager and CEO of the company certifies that he reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and
5. Posts OSHA 300-A Summary of Work-Related Injuries and Illnesses on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

All employees, former employees, their personal representatives, and their authorized employee representatives have a right to access our regulatory-required injury and illness records, with the following limitations:

1. We are allowed to give the requester a copy of OSHA 300 Log of Work-Related Injuries and Illnesses by the end of the next business day.
2. We may choose to not record the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses in order to protect the privacy of injured and ill employees in certain privacy-concern cases.
3. We are allowed to give an employee, former employee, or personal representative a copy of OSHA 301 Form Injury and Illness Incident Report by End of the next business day. A personal representative is:
 - Any person that the employee or former employee designates as such, in writing; or
 - The legal representative of a deceased or legally incapacitated employee or former employee.
4. We are allowed to give authorized employee representatives under a collective bargaining agreement a copy of OSHA 301 Form Injury and Illness Incident Report within seven (7) calendar days.
5. An authorized employee representative is an authorized collective bargaining agent of employees. The authorized employee representative will be provided the OSHA 301 Incident Report section titled 'Tell us about the case.' Trinity will remove all other information from the copy of the OSHA 301 Incident Report or the equivalent substitute form that is given to the authorized employee representative.

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6. While the first copy is free, we may charge a reasonable amount for retrieving and copying additional copies.
7. Employees also have access to OSHA 300-A Summary of Work-Related Injuries and Illnesses, which is posted on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

Trinity does not discriminate against employees who request access to any records or otherwise exercise any rights afforded by the OSH Act.

The Operations Manager saves the following records for (5) years following the end of the calendar year that these records cover:

- OSHA 300 Log, the privacy case list (if one exists);
- the annual summary; and
- OSHA 301 Incident Report forms.

During the storage period, the Operations Manager updates OSHA 300 Log of Work-Related Injuries and Illnesses to include any newly discovered recordable injuries or illnesses and any changes that have occurred in the classification of previously recorded injuries and illnesses. If our company changes ownership, the CEO is responsible for transferring the records to the new owner.

