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President

LEHMAN-ROBERTS COMPANY

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September 20, 1999

Ms. Diane Miller
NOISH Docket Officer
Mailstop C-34
4676 Columbia Parkway
Cincinnati, Ohio 45226-1998

Re: Draft Building Safer Highway Work Zones

Dear Ms. Miller:

I am returning a marked copy of the above referenced draft. There were two suggestions that we would make in the document. The first one is on page 5, which is an addition, and the second suggestion is on page 10, which is an insertion between daily and equipment.

We certainly think this is an excellent document and hope that it will be published in the near future.

Very truly yours,

LEHMAN-ROBERTS COMPANY

Richard C. Moore, Jr.
President

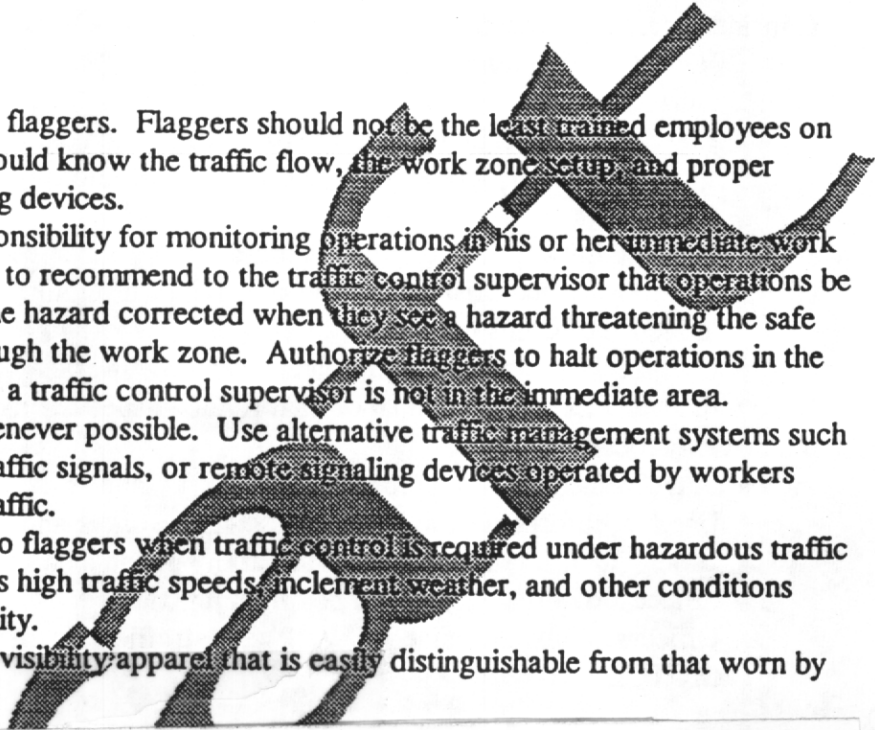
RCM/gcr

- ✓ Require consistency in traffic control devices within a single work zone area. Move toward uniformity in the type and placement of traffic control devices within local jurisdictions, at the state level, and nationally.

Flaggers

Employers can:

- ✓ Train and certify all their flaggers. Flaggers should not be the least trained employees on the job site. Flaggers should know the traffic flow, the work zone setup, and proper placement of channelizing devices.
- ✓ Assign each flagger responsibility for monitoring operations in his or her immediate work area. Authorize flaggers to recommend to the traffic control supervisor that operations be temporarily halted and the hazard corrected when they see a hazard threatening the safe movement of traffic through the work zone. Authorize flaggers to halt operations in the event a hazard arises and a traffic control supervisor is not in the immediate area.
- ✓ Avoid using flaggers whenever possible. Use alternative traffic management systems such as lane shifts, portable traffic signals, or remote signaling devices operated by workers away from the flow of traffic.
 - Use alternatives to flaggers when traffic control is required under hazardous traffic conditions such as high traffic speeds, inclement weather, and other conditions which limit visibility.
- ✓ Have flaggers wear high-visibility apparel that is easily distinguishable from that worn by other highway workers.



Motoring public

Employers can:

- ✓ Ensure that motor broadcasts.
- ✓ Install warning sign information so that
- ✓ Keep warning sign
- ✓ Cover or take down

In the event multiple flaggers are required, ensure they have the appropriate site distance or voice transmitting devices to communicate effectively.

Police/motorist (Federal, S

- ✓ Provide alternative routes, alternative routes, and plenty of advance warning of upcoming work zones.
- ✓ Look at system-wide ways to reduce traffic volume, such as flex-time and telecommuting.

also authorize the coordinator to make adaptive changes and/or halt operations as needed to ensure worker safety.

- ✓ Implement a reporting system for all close-calls and incidents related to the internal traffic control plan. To increase reporting, consider using an anonymous reporting system. Evaluation of reports and remediation of hazards can be the ITCP coordinator's responsibility.
- ✓ Continually evaluate the ITCP and adjust when necessary.
- ✓ Require contractors and subcontractors to prepare site-specific hazard assessments that include identification of hazards and description of how hazards will be eliminated or controlled.
 - For each project, base worker training needs on information provided in the project's hazard assessments.
 - Make supervisors accountable for daily documentation of hazards and how hazards were mitigated.
- ✓ Adopt a hazard communication program in which each contractor informs all other contractors of hazards related to their work. This allows each contractor the opportunity to ensure that employees are aware of hazards resulting from work being done by others at the site.
- ✓ Conduct a preconstruction meeting among contractors to coordinate project activities so that hazards are minimized.
- ✓ At the entrance to the activity area, distribute site-specific safety materials, including a copy of the ITCP and safety guidelines for workers on foot, to all drivers and visitors coming into the activity area.

Equipment operation and maintenance

Employers can:

- ✓ Make sure that all equipment and vehicle operators have a valid driver's license.
 - ✓ Allow equipment to be operated only by persons who have been trained and authorized to operate that piece of equipment. Assign responsibility for each piece of equipment to an individual worker.
 - ✓ Designate a supervisor to be responsible for daily equipment checks and for verifying that any problem supervisor necessary records of a records of a
 - ✓ Ensure that
 - ✓ When repair that the equ
 - ✓ Require equ unattended.
- Pushift* ↑
- various people, the ned daily, that und for maintaining ment safety checks. made inoperable so eing made. uipment nmobilize the