

**Virginia Department of Labor and Industry  
Virginia Occupational Safety and Health (VOSH) Program  
September 4, 2009**

**Interpretation Concerning Asphalt Paving and Milling Operations**

Asphalt Paving and Milling Operations

- Asphalt paving and milling operations often take place in tightly restricted coned-off lanes where traffic is passing by the work zone in close proximity to the paving train or milling operation on one or both sides of the lane being placed or resurfaced.
- Good paving practices as outlined in VDOT specifications and guidelines necessitate that the asphalt paver continuously move forward while being replenished by dump trucks bringing asphalt mix from the plant. A similar procedure takes place during milling operations prior to placement of the asphalt (e.g. a line of trucks backing up to a milling machine to receive recyclable asphalt).
- This results in a line of trucks in front of the paver or milling machine waiting their turn to back up and offload mix into the paver's hopper or pick up recycled asphalt pavement (RAP) to take back to the plant. As new mix is brought to the paver, the emptied truck pulls out to return to the asphalt plant. In a milling operation, once the truck is filled with RAP it also pulls out to return to the plant. In many cases the trucks will pull out of the paving lane and into the active driving lane, crossing between the next truck in line and the paving crew.
- A VDOT required liquid asphalt coating (tack coat) is also applied on the pavement in front of the paver for some distance that serves as a bonding agent for the new asphalt mat to the old pavement surface that is being repaired. This material is placed prior to the arrival of the trucks.
- A member of the paving crew directs each truck delivering asphalt or picking up RAP as it backs up to the paver or milling machine and he has a clear view of the area behind that vehicle, but he cannot see behind the other trucks next in line to get to the paver or milling machine.
- The VAA is concerned that the trucks that line up to pour their asphalt in a paving train or are there to pick-up RAP in a milling operation will each need a ground guide before backing. It is possible that to comply with the regulation, a ground guide would be required for each truck's backing movement or a single ground guide would have to continuously be moving back and forth in the work zone to direct each truck's movements while standing in the recently sprayed tack coat on the pavement surface. This may result in the ground guide being exposed to hazards from moving traffic adjacent to the work zone, and the crossing truck leaving to return to the plant. In doing his job, the ground guide would also have his back to the adjoining moving traffic - one or two steps back could be fatal.

- Having the truck drivers get in and out of their truck for each backward movement to determine that the area behind the truck is clear creates its own set of problems as the driver will be opening the cab door and stepping out right next to moving traffic and must by other rules be fully outfitted with safety gear vests, steel toed shoe, hard hats, etc.

### Interpretation

The final Reverse Signal Operation regulation allows for the use of either a ground guide or for drivers to determine if the backing path is clear before backing. If the driver can determine that the backing path is clear, no ground guide is necessary under the regulation.

Trucks backing down a paving lane to reach the paver or milling machine do not need a ground guide until they approach the paving crew if:

- the paving lane has been designated as a “prohibited area” and “coned-off” in accordance with VDOT requirements;
- employees have been instructed not to enter the paving lane during backing operations;
- drivers are required to remain in their vehicles once they are in the backing lane so that they are not exposed to traffic and/or other asphalt trucks;
- if an employee enters the paving lane “prohibited area” for any reason during backing operations, backing operations must be immediately stopped until the employee is removed from the “prohibited area” or a ground guide is provided;
- a ground guide for the paving crew is provided to assist in back-up operations of each truck as it delivers its load of asphalt or picks up RAP from milling machines.