

SAFETY PROGRAM

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SAFETY & HEALTH POLICY

To All Employees:

The safety, health, and well-being of employees are of major importance to our company. We believe that each individual working within the company desires to have a safe and healthful working environment and accepts personal responsibility for their safety and the safety of others.

To assist all employees, our company will provide training programs and sufficient resources to assure protection of all individuals, company materials, equipment, and facilities.

Within company operations, safety is a part of every job and we believe that every job can and must be done safely. Safety is considered equal in importance to productivity, quality, cost, and personal relationships.

In the final analysis, the success of our safety efforts will depend on the safety awareness and commitment of each individual in the company. Each person should be aware of the company safety and health program and strive to assure a safe and healthful working environment for all.

Thank you for your cooperation.

President

POLIZA DE SEGURIDAD

A Todos los Empleados:

La Seguridad, salud y bien estar del empleado son de mayor importancia a nuestra compañía. Nosotros creémos qué todo individuo qué trabaja en la compañía desea tener un ambiente seguro y saludable, y También aceptar responsabilidad personal para su seguridad y la de otros.

Nuestra compañía proveéra programas para asistir a todos los empleados. Tal como programas de entrenamiento y también recursos suficientes para asegurar la protección de cada individuo,de los materiales, del equipo, y de las facilidades.

Dentro de las operaciones de la compañía la seguridad es parte de cada trabajo y creémos qué cada trabajo puede ser y debe ser seguro. La seguridad se considera igual de importante qué la producción, la calidad, el costo y las relaciones personales.

En el analisis final, el exito de nuestros esfuerzos de seguridad van a depender en el conocimiento de seguridad, y en el compromiso de cada individuo en la compañía. Cada persona debe tener conocimiento del programa de seguridad y salud y debe esforzarse por asegurar un ambiente seguro y saludable para todos.

Gracias por su cooperacion.

Presidente

ASSIGNMENT OF RESPONSIBILITY

PRESIDENT

- Overall responsibility for establishment of policy and program implementation.

MANAGEMENT

- Review and approves safety programs designed to meet the goals of the company.
- Implementation of Safety Program through motivation, training, counseling and enforcement.
- Responsible for initiating compliance for all safety program elements applicable to his/her area.
- Identify hazards through safety inspections and develop timely countermeasures.
- Responsible for training subordinates in accident prevention and safe work habits.
- Responsible for timely accident investigation and reporting including paperwork and countermeasures.
- Responsible that all powered equipment companies with all appropriate safety regulations and is locked out/tagged out of service including work order for repairs and date of expected completion.

SAFETY COORDINATOR

- Responsible for maintaining a current copy of all applicable Federal, State and local safety and health regulations.
- Responsible for implementation of Loss Control program.
- Responsible for implementation and monitoring safety training.
- Chair Safety Committee.
- Recommend safety training programs.
- Review and recommend changes in the safety program as the need is identified.
- Responsible for all required non-confidential records.
- Conduct annual safety review.
- Responsible for maintaining system to provide first aid supplies and secure prompt medical attention for injured employees.
- Responsible for assuring proper notification, internal and external, in the event of an accident, incident or fatality.

SAFETY COMMITTEE

- Meet on a regular schedule.
- Review all accident reports and determine preventability.
- Conduct safety inspections.
- Review employee safety suggestions.
- Recommend and assist in establishing additional general safety rules as the need is identified.
- Develop and monitor a safety improvement plan with respect to company activities.
- Prepare a written Safety Committee Report of the topics discussed, agreements made, accidents reviewed, self-inspection results, and anticipated future committee activities.

EMPLOYEE SAFETY RESPONSIBILITIES

- All employees shall be responsible to learn and comply with all safety and health rules and regulations applicable to their work area. It is their further responsibility to support the company in providing a safe place to work, and to protect themselves and co-workers against injuries or illnesses.
- Employees shall report all safety and health hazards to supervisors and shall take all necessary actions to establish an immediate temporary control of the hazard until permanent control can be established.
- Employees shall immediately report all accidents or incidents occurring on the job to their supervisor. Treatment for an on-the-job injury must be received from a doctor listed on the company's panel of physician poster.
- Employees shall cooperate and assist in the investigation of all accidents or incidents.
- Employees shall utilize all personal protective equipment provided.
- Employees shall practice sanitary health habits.

RESPONSABILIDADES DE SEGURIDAD DEL EMPLEADO

- Todos los empleados serán responsables de aprender y de obedecer todas las reglas y las regulaciones de seguridad y salud, aplicables a su área de trabajo. Además es su responsabilidad de apoyar a la compañía en proveer un lugar de trabajo seguro y de protegerse a sí mismo y a sus compañeros de trabajo contra los daños y las enfermedades.
- Empleados deben reportar todo peligro de seguridad y de salud a los supervisores y deben tomar toda acción necesaria para establecer un control temporal e inmediato hasta que un control más permanente pueda ser establecido.
- Empleados deben reportar inmediatamente todos los accidentes o incidentes que ocurran en el trabajo a su supervisor. El tratamiento de una lesión del trabajo debe ser dado por un doctor de la lista de doctores **de la compañía**.
- Empleados deben de cooperar y asistir en la investigación de todos los accidentes o incidentes.
- Empleados deben utilizar todo el equipo protector personal que se le provee.
- Empleados deben practicar costumbres saludables.

GENERAL SAFETY RULES

GENERAL SAFETY RULES

REGLAS DE SEGURIDAD GENERALES

You are working for an organization that is sincere in its desire to conduct all of its operations in the safest manner possible. Compliance with the General Safety Rules listed below will assist us in achieving this objective. These rules are the minimum guides for working safely. Your continued awareness and cooperation in loss control is a vital part of your job. It is your duty to apply these and all accepted standards of loss control to your daily activities. Failure to do so is grounds for disciplinary action.

1. Report all injuries, no matter how minor, to your supervisor immediately upon occurrence.
2. Immediately report any condition or practice you think might cause personal injury or damage to equipment.
3. Only operate equipment on which you have been properly trained and which is in safe working condition.
4. Use all prescribed safety and personal protective equipment when required for the job; maintain it in good working condition.
5. Obey all company rules, governmental regulations, signs and instructions. Be especially familiar with those that apply directly to you and your department. If you don't know, ask.
6. When lifting, use the approved lifting technique, i.e., get the load in as close to your body as possible, bend your knees as much as you can to let your stronger leg muscles do the lifting for you, grasp the load firmly and raise it keeping your back as straight as possible. Get help for heavy loads.
7. Avoid distracting others; don't engage in horseplay; be courteous to your fellow workers - treat them as you, yourself, would want to be treated.
8. Always use the right tools and equipment for the job. Use them safely and only when authorized. Promptly report repair problems.
9. Maintain good housekeeping in your immediate work area. Return all tools, equipment materials, etc. to their proper places after use. Discard trash and obsolete materials in appropriate trash receptacles.
10. All visitors must go to the office first.

Company safety rules and procedures have been developed for your benefit and must be observed. Failure to abide by company safety rules and policies could result in suspension without pay and/or termination.

Esta usted trabajando para una compañía que desea que toda sus operaciones se realicen de la manera más segura posible. Estas reglas son una guía mínima para trabajar de una manera segura. Su continuo conocimiento y cooperación son una parte vital para su trabajo. Es su deber aplicar estos y todo criterio a sus actividades diarias. De no hacer esto, Sera causa para acción disciplinaria incluyendo despido.

1. Reporte inmediatamente a su supervisor cualquier problema, daño, o accidente, no importa que tan insignificante.
2. Reporte inmediatamente cualquier condición o practica que usted piense que pueda causar daño al personal o al equipo.

Solamente opere maquinaria en la cual ha sido entrenado apropiadamente y que este funcionando en una manera segura.

4. Utilize todo el equipo personal protector que se le ha proveído cuando se requiere en el trabajo; mantengalo en buenas condiciones.
5. Obedezca todas las reglas de la compañía, las regulaciones del gobierno, los letreros y las instrucciones. Especialmente este familiarizado con las que apliquen directamente con usted y con su departamento. Si no sabe, pregunte.
6. Cuando levante use las tecnicas apropiadas; por ejemplo: ponga la carga lo más cerca posible a su cuerpo, doble sus rodillas lo más que pueda para que los musculos más fuertes de las piernas hagan toda la carga por usted, tome la carga firme y levántela manteniendo su espalda lo mas recta posible. Pida ayuda para las cargas pesadas.
7. Evite distraer a otros; no se comprometa en Juego rudo; sea amable con sus compañeros de trabajo - trátelos como a usted le quisiera que lo trataran.
8. Siempre utilize la herramienta y el equipo apropiado para el trabajo. Uselos de una forma segura y solamente cuando sean autorizados. Reporte enseguida cualquier problema de reparación.
9. Mantenga buena limpieza en su area inmediata de trabajo. Regrese toda la herramienta, y materiales de equipo, etc. a su lugar apropiado despues de utilizarlos. Tire basura y materiales que no sirvan en los recipientes de basura apropiados.
10. Todos los visitantes deben pasar a la oficina primero.

Todas las reglas de seguridad y procedimiento han sido desarrollados para su beneficio y deben ser obedecidas. Fallar de obedecer las reglas de la compañía y sus polizas puede resultar en una suspension sin pago y/o despido.

EMPLOYEE TRAINING

SAFETY ORIENTATION

ON-GOING SAFETY TRAINING

EMPLOYEE TRAINING

A safe operation depends primarily on employee awareness of workplace hazards (in conjunction with management's efforts to reduce such hazards). Statistics have shown that 85-90% of work-related injuries occur as a result of an unsafe act on the part of the injured employee. Injuries can be prevented with a variety of strategies. The effectiveness of the strategies varies with the extra effort required to keep people from being harmed and the degree to which people must change their unsafe behavior patterns.

PURPOSE

To ensure that all current and new employees and supervisors are effectively trained to perform their assigned task in a safe manner.

FUNDAMENTALS

1. It is essential to the success of the overall accident prevention program that all supervisors and employees ask how to perform their assigned task, understand how the task should be done, and are able to perform the assigned task as prescribed.
2. Statistics show that new employees have serious injuries more often due to ineffective training.
3. Employee training is a line management responsibility.
4. Every assigned task can and must be performed in a safe manner.

In this regard, K.P. Meiring Company has developed a new Employee Safety Orientation Training Program. It is the administrative assistants' responsibility to ensure each new employee receives basic safety orientation training. The following checklists will be used to document the new employee safety orientation training. The training should be given on the first day of employment. The signed checklists will be placed in the personnel file of the new worker to become part of his/her permanent record.

NEW EMPLOYEE SAFETY ORIENTATION CHECKLIST

A key element in our safety program is the initial training of our employees. You need to know the company safety program, policies and rules so you develop good safety attitudes and work procedures.

We know everyone is interested in having a safe and desirable place which to work and are anxious to avoid accidents and fires. Accidents cause human suffering, loss of income and loss of production. Fires can destroy our jobs.

We feel it is a joint responsibility of all of us to take every possible step to prevent accidents and fire. Therefore, we are engaged in a continuous Safety Program to eliminate hazardous conditions and unsafe acts.

We expect each and every one of our employees to do the most they can to prevent accidents and fires by cooperating with our safety program. To this end, the following areas are to be covered as a part of your safety orientation to the job.

Un elemento principal en nuestro programa de seguridad es el entrenamiento inicial de nuestros empleados. Usted necesita conocer el programa de seguridad de la compañía y sus polizas y reglas para que Usted desarrolle buenas actitudes de seguridad y de los procedimientos del trabajo.

Sabemos que todos estan interesados en tener un ambiente seguro y deseable en donde trabajar y que estan ansiosos de evitar accidentes e incendios. Accidentes causan sufrimiento humano y perdida de producción. Incendios pueden destruir nuestros trabajos.

Nosotros sentimos que es una responsabilidad junta de todos para tomar todo paso posible en prevenir accidentes e incendios. Así que estamos comprometidos en continuar un Programa de Seguridad para eliminar condiciones arriesgadas y actos peligrosos.

Esperamos que cada uno de nuestros empleados hagan lo más posible en prevenir accidentes e incendios a traves de cooperar con nuestro programa de seguridad. Con este fin las siguientes areas seran incluidas como parte de su orientación de seguridad al trabajo.

_____ REVIEW OF COMPANY SAFETY POLICY

Repaso de poliza de Seguridad de la compañía

_____ REVIEW OF EMPLOYEE SAFETY RESPONSIBILITIES & RULES

Repaso de Responsabilidades y de Reglas para el empleado

_____ REVIEW OF HAZARD COMMUNICATION PROGRAM

Repaso del programa de comunicación de peligro

_____ USE OF PERSONAL PROTECTIVE EQUIPMENT (safety glasses, gloves, etc.)

Uso de equipo de protección personal (lentes de seguridad, guantes, etc.)

_____ PROPER LIFTING TECHNIQUES

Técnicas apropiadas para Cargar

_____ LOCATION OF FIRE EXTINGUISHERS AND FIRE EXITS

Lugar de Estinguidor de Incendios

_____ WHAT TO DO IN CASE OF A FIRE OR EMERGENCY (emergency evacuation procedures)

Qué hacer en caso de Incendios y Emergencias

I acknowledge the above information was discussed with me during my safety orientation.

Entiendo toda esta información la cual fue explicada durante la orientación.

EMPLOYEE'S SIGNATURE

Firma del Empleado

DATE

Fecha

MANAGER'S SIGNATURE

Firma del Gerente

DATE

Fecha

TRANSLATOR'S SIGNATURE

Firma del Traductor

DATE

Fecha

EMPLOYEE SAFETY MEETINGS

The on-going safety training employees receive through a safety meeting program can be of critical importance to the achievement of company production goals. An Employee Safety Meeting Program is a way to achieve employee involvement in your safety effort.

The Supervisor is in the best position to assure employees work safety and that safe workplace conditions are maintained. Therefore, the Supervisor is the best person to conduct employee safety meetings. Some basic question about organizing and conduction employee safety meeting are answered below.

WHAT ARE THE BENEFITS?

- * Employees receive group safety training to supplement their safety orientation training increasing safety awareness.
- * Interest in safety can be stimulated and maintained.
- * Employees are made a part of the safety effort and taught that safety is an integral part of their job.
- * Employees realize management is concerned about their welfare and committed to the safety program.

HOW SHOULD THE MEETING BE PLANNED?

- * Meetings should be held on company time on a definite day of each month and at a specific hour.
- * Hold meetings in a quiet room that has ample light and ventilation, away from the work area avoiding distraction.
- * The meeting length will depend on the needs and circumstances of the department, but in general, 20-30 minutes should be the maximum.

WHAT SHOULD BE DISCUSSED?

- * Before the scheduled meeting, make an inspection of the department and discuss the results; i.e., unsafe conditions and unsafe acts of employees, observed use of personal protective equipment, safe work practices, etc.
- * Report on progress made on previous inspection suggestions.
- * Review accidents and resulting investigations occurring since the last meeting. Discuss recommendations for preventing recurrence of similar accidents.
- * Cover the safety subject of the month. Keep it relevant to your employees. Focus on accident trends and reoccurring unsafe work practices and conditions observed during premise inspections.
- * Discuss new business and any special safety projects; i.e., lockout/tagout, emergency evacuation, hazard communication.

HOW SHOULD THE "SAFETY SUBJECT OF THE MONTH" BE DETERMINED?

- * Study the accident reports from the department to determine safety subjects needing special emphasis.
- * Discuss new equipment arriving in the department; i.e., care, use, safe operation, guards.
- * Review safety rules and enforcement policy.
- * Review first aid policy and procedures for obtaining medical treatment for on-the-job injuries.
- * Try using other sources of media in your meetings like videos, handout materials, and guest speakers.

WHAT ABOUT RECORDKEEPING?

Minutes of the meeting should be maintained to document the on-going safety training employees receive each month. A list of those workers in attendance should be included to provide a record of which employees received the training.

REPORT OF EMPLOYEE SAFETY MEETING

Meeting Date

Number Attending

Department

List Those Present On Reverse Side

SafetySubject:

AccidentsReviewed:

Supervisor: _____

Inspection: _____

Results: _____

NewBusiness:

Signature:

Title:

**OSHA
RECORDKEEPING**

OSHA RECORDKEEPING

The sole purpose of OSHA recordkeeping is to store factual information about certain accidents. When the facts have been determined, causes can often be identified, and control procedures can be instituted to prevent a similar occurrence.

INJURY/ILLNESS RECORDS

Records provide us with one measure for evaluating the success of our safety and health activities. Success would generally mean a reduced number of employee injuries or illnesses during a calendar year.

There are five important steps required by the OSHA recordkeeping system:

1. Obtain reports on every injury requiring medical treatment (other than first aid). Generally, a supervisor's report of injury and employee incident report with witness statements would be satisfactory.
2. Record each injury on the OSHA Form No. 200 according to the instructions provided on the back of the form.
3. Prepare a supplemental record of occupational injuries and illnesses for recordable cases either on OSHA Form No. 101 or Workers' Compensation (First Reports of Injury) reports giving the same information.
4. Every year, prepare the annual summary (OSHA Form No. 200); post it no later than February 1, and keep it posted until March 1. (Next to the OSHA workplace poster is a good place to post it.)
5. Retain these records for at least five (5) years.

SAFETY COMMITTEE

HEALTH & SAFETY COMMITTEE

DEFINITIONS

A Safety Committee is a group of employees within a company who are appointed for the purpose of assisting top management in providing a safe work environment. A safety committee:

1. Ensures a broad range of ideas and expertise.
2. Distributes the workload.
3. Eases distribution of information.
4. Provides a forum for workers to express concerns.
5. Acts as a liaison between management and workers.
6. Increases employee buy-in to the total safety program.

MEMBERSHIP

The committee will be composed of a cross-section of employees representing major departments within *K.P., Meiring Company*. This will include top management, supervisors, and the general work force. Committee members will be chosen for the purpose of sharing a common interest in the safety and welfare of each and every individual who may enter this facility. Members must be prepared to make recommendations, which will reduce the employer's losses and provide a safe atmosphere for everyone.

CHAIRPERSON

A chairperson will be chosen from among the committee members on the basis of commitment, leadership, and the ability to get results. The duties of the chairperson will include:

1. Preside at the committee meetings.
2. Review an analysis of supervisors' investigation reports, open workers' compensation cases, investigations, inspections, and recommendations.
3. Assign special ongoing projects to committee members.
4. Insure that the activities of the health and safety committee are communicated throughout the organization.
5. Prepare reports to the administrator.
6. Review the minutes before distribution.
7. Prepare an agenda to be distributed to committee members prior to the meeting.

MEETINGS

The safety committee should meet at least quarterly. Minutes should be taken by the committee secretary and include but not be limited to the date and time of the meeting, attendance record, old business, new business (including new accidents, inspections, and safety suggestions), motions and recommendations, and the date and time of the next meeting.

RESPONSIBILITIES

The committee has the responsibility of monitoring the activities of the safety program and evaluating the extent to which the policies and procedures of the safety manual are being implemented. Obligations of the committee will include:

1. Development of a means by which an employee may make recommendations to the committee. This could be done through:
 - A. Written recommendations submitted by employees or committee members.
 - B. Committee discussions resulting in acceptance, rejection, or modification of suggestions.
 - C. Accepted recommendations submitted to top management.
 - D. Written reply to committee from management.
 - E. Results reported back to the originator of the suggestion.
2. Review Supervisors' Investigation Reports to identify causes and eliminate unsafe practices and conditions.
3. Review safety inspection reports in order to correct physical hazards and maintain the grounds and facility at the highest degree of efficiency.
4. Examine the safety education and training programs for administrative and supervisory personnel and employees with the purpose of modifying the program in order to obtain maximum effectiveness.
5. Review all workers' compensation cases for which employees are either off work or on restricted duty in order to monitor the program and make further recommendations.
6. Evaluate the safety rules, policies, and procedures in the interest of making additions, deletions, or modifications to increase their effectiveness.
7. Inspect the inherent hazards of new equipment, materials, substances, or work practices in order to insure safe exposure.
8. Review any additional company matters that may influence the overall health and safety program.

ACCIDENT REPORTING

EMPLOYEE INCIDENT REPORT

SUPERVISOR ACCIDENT INVESTIGATIONS

EMPLOYEE INCIDENT REPORT

Every injured employee shall, immediately on the occurrence of any accident or as soon thereafter as practical, notify the employer or supervisor of the accident. The employee in person shall give this notice and, until such notice is given, the employee shall not be entitled to any physician fees nor to any compensation, which may have accrued because of this accident prior to the giving of such notice.

Once the accident has been reported, the employee must be responsible for completing the company incident report "in his/her own words." Once the report is completed, the employee should sign the report verifying the accuracy of the information. This report should be used in addition to the employer's workers' compensation claims report which is submitted to the insurance carrier.

The purpose of the employee incident report is to allow the employee time to reconstruct the events leading up to the accident and expresses them in a concise and factual manner. In addition, recreating the accident in writing allows the employee more time to analyze the circumstances surrounding the accident, thereby reducing the chance of recurrence.

EMPLOYEE'S REPORT OF INJURY FORM

EMPLOYEE'S NAME: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP: _____

EMPLOYEE'S HOME TELEPHONE NUMBER: () _____ - _____

DATE OF ACCIDENT: _____ EQUIPMENT INVOLVED: _____

REGULAR JOB ASSIGNMENT: _____

ACCIDENT REPORTED TO: _____

FIRST AID ADMINISTERED BY: _____

MEDFICAL ATTENTION AUTHORIZED BY: _____

HOSPITAL REFERRED TO (IF EMERGENCY): _____

WHO ELSE WAS PRESENT WHEN THE ACCIDENT OCCURRED?: _____

HOW DID THE ACCIDENT OCCUR?

**DESCRIBE THE INJURY IN DETAIL &
INDICATE PART OF BODY AFFECTED.**

HOW COULD THIS ACCIDENT HAVE BEEN PREVENTED?

EMPLOYEE'S SIGNITURE: _____

DATE: _____

SUPERVISOR ACCIDENT INVESTIGATIONS

PURPOSE

The single purpose for investigating accidents is the prevention of future accidents. The supervisor of the injured person is responsible for conducting the accident investigation.

BENEFITS

Prompt and thorough accident investigations result in a reduction of future accidents. This, in turn, preserves financial and human resources resulting in increased production.

WHAT IS AN ACCIDENT? WHAT IS AN INCIDENT?

An accident is an undesirable occurrence resulting in personal harm or property damage. An incident, or near miss, is an undesirable occurrence that under slightly different circumstances could have resulted in personal harm or property damage.

WHAT IS AN ACCIDENT INVESTIGATION?

An accident investigation is the analysis and documentation of an accident based on factual information gathered by a thorough and conscientious examination of all factors involved. It is a systematic effort to determine what happened, how it happened, why it happened, and what must be done to prevent it from happening again. It *is not* a mere repetition of the employee's explanation of the accident he or she had. Complete accident investigations include the objective evaluation of all facts, opinions, statements, and related information as well as a defined sequence of actions to be taken to prevent recurrence. Exhibit I of this section provides a Questioning Guide supervisors can refer to when conducting their investigations.

SUMMARY

Accident prevention and loss control is everyone's responsibility. Employees must be trained and willing to report all accidents, incidents and unsafe working conditions. Supervisors must be prepared to act as soon as they have been told an accident has occurred. Once an investigation has been conducted, the supervisor must take corrective actions for which he or she has authority. Since accidents often are caused by a number of factors, top management must quickly review reports to assure that, if necessary, corrective action is taken in areas beyond the jurisdiction of the investigating supervisor.

SUPERVISOR'S 1ST REPORT OF INJURY & ACCIDENT INVESTIGATION REPORT

PROPERTY LOCATION & ADDRESS:		HIRE DATE:	
DATE OF ACCIDENT:	1st DATE EMPLOYER AWARE:	TIME: AM PM	
INJURED EMPLOYEE'S FULL NAME & ADDRESS:		PHONE #:	SOCIAL SECURITY #:
DATE OF BIRTH:	DEPT. & OCCUPATION:		WEEKLY WAGE RATE:
ACCIDENT REPORTED TO:			
FIRST AID OR DOCTOR AUTHORIZED?		DID INJURED LEAVE WORK?	
NAME/ADDRESS OF TREATING DOCTOR:			
DID INJURED RETURN TO WORK?		DATE &/OR TIME:	
EQUIPMENT INVOLVED (If Any):		NAME(S) OF WITNESS (If Any):	
DESCRIPTION OF ACCIDENT & PART OF BODY INJURED: (Describe fully the events which resulted in accident)			
CAUSES OF ACCIDENT/INJURY: (include unsafe conditions as well as unsafe work practices)			
RECOMMENDATIONS TO PREVENT RECURRENCE:			
DATE OF REPORT:		SUPERVISOR:	

INSPECTIONS

WORKPLACE SAFETY INSPECTIONS

Periodic safety inspections and audits performed for the purpose of identifying actual or potential hazards and reducing risk of injury will be made at our facility by K.P. Meiring Company.

OBJECTIVES OF INSPECTION PROGRAM

1. To identify and record potential and actual hazards associated with buildings, equipment, environment, processes, and practices.
2. To identify any hazards which require immediate attention.
3. To insure that existing controls are operative and sufficient.
4. To recommend corrective action.

CONDUCTING THE INSPECTION

A regular planned inspection should be performed at least semi-annually. A sample safety inspection checklist is included at the end of this section. In addition to the formal semi-annual facility safety inspections, each manager should conduct an informal monthly walk-through or spot inspections. On-the-spot correction of deficiencies found will be made.

FOLLOW UP

The written semi-annual inspection reports will be submitted to the company president for follow up on recommendations made. Follow up procedures will be used to:

- a. Highlight the need for training in various areas.
- b. Provide reasons for accidents occurring in particular areas.
- c. Establish priorities for corrective action.
- d. Assist in improving work practices.
- e. Indicate areas or equipment, which may need more in-depth hazard analysis.

Safety Inspection Report

INSPECTED BY _____ DATE _____

INSPECTION GUIDES	Yes	No	RECOMMENDATIONS
1. UNSAFE ACTS OF EMPLOYEES - Watch for the following in all areas inspected: Using equipment without authority. Insecure or disorderly piling or arranging of material. Operating equipment at unsafe speed. Using defective tools or equipment. Unsafe loading of trucks, skids, etc. Lifting improperly, or handling loads that are too heavy. Using improper tools or equipment for the job being done. Failure to use personal protective equipment. Horseplay.			
2. STAIRWAYS - Hand rails provided & in good condition? Lighting adequate?			
3. FLOORS - Are there holes, slippery, loose tiles, torn carpet? Are openings protected? Guard rails where needed?			
4. AISLES - Are they obstructed, cluttered or unmarked? Trip/slip hazards?			
5. HAND TOOLS - Mushroomed heads, split and loose handles. Are cutting edges sharp? Are tools adequate for the job being done?			
6. FIRE HAZARDS - inspect fire-fighting equipment - fire extinguisher date refilled, hoses, obstructed. Is rubbish, oily waste disposed of in covered metal cans? Are flammables stored properly?			
7. LADDERS - Are they standard construction and in good condition? Are they used and mounted properly? Returned to a designated storage place after use?			
8. ELECTRICAL - Are electrical tools and machines grounded? Any open electrical outlets, junction boxes, and switches? Blanks provided for unused circuit breakers? Are circuit breaker panels accessible and unobstructed? Wiring in good condition free of splices and frayed ends?			
9. HOUSEKEEPING - Storage bins and racks orderly? Trash & obsolete materials disposed of properly? Items to be saved neatly stored & stacked to prevent falling. Grass & weeds cut away from bldg. parameters.			
10. PERSONAL PROTECTIVE EQUIPMENT - Is proper personal protective equipment available? Used? Maintained in good condition?			
11. LIGHTING - Check for proper kind and amount of light on work benches, machines, desks, stairways and general work area.			
12. FIRST AID - Are supplies provided? Do they include gloves, two way mouth valves and goggles? Has the Panel of Physicians poster been posted?			
13. MATERIAL HANDLING EQUIPMENT - Check forklifts, hand trucks, and pallets.			
14. BUILDING ENTRANCES & PREMISES - Any blind spots? Stumbling or slip/trip hazards?			

FLEET SAFETY

FLEET SAFETY

Introduction

Vehicular accidents account for the most frequent insurance losses incurred by our industry; therefore, it is critical that driver safety be a priority safety concern for all employees.

The following guidelines are designed to educate each operator about vehicular safety, whether driving a truck, tractor/trailer, van, or car, and how to control accidents.

Management Direction and Leadership

Management considers accident control essential both for humanitarian and economic reasons. The accident control plan will apply to all departments and all operations. All drivers are expected and required to cooperate.

Operation of motor vehicles is a necessary part of our business operations. Operation of motor vehicles exposes our company to losses, financially through damaged property, and injury to employees or injury to members of the general public and to our company's reputation. As a result, the following policies are endorsed by management as part of our commitment to operate all aspects of our business in a safe and responsible manner.

- **Authorized Drivers** - only those specifically authorized by management to operate company vehicles for company business. This included drivers of company owned vehicles, employees operating personal vehicles on company business and any authorized family members.

Motor Vehicle Records (MVRs) - will be obtained and evaluated annually based on established criteria by management before any employee or designated person is allowed to operate a company vehicle or private vehicle on company business.

The following MVR evaluation criteria (on or off the job violations) will disqualify all persons as authorized drivers:

- Three (3) or more moving violations within the preceding 36 months.
- Driving under the influence of drugs or alcohol.
- Hit and Run Accident.
- Failure to report an accident.
- Operating a vehicle under a suspended or revoked license.
- Homicide, assault or a felony arising from the operation of a motor vehicle.
- Reckless Driving/Speed Contest/Racing.

Driver Selection

Job performance affects the success of the entire fleet operation and directly influences fleet safety performance. Every effort is made to select the most qualified person for each job. K.P. Meiring Company selection of drivers requires the following:

1. An application form filled out in the driver applicant's own handwriting.
2. A personal interview to provide face-to-face contact and further appraisal of job knowledge and qualifications.
3. Phone or written reference checks with previous employers.
4. A copy of the applicant's MVR (Motor Vehicle Record) and a copy of the driver's

Department of Transportation (DOT) certificate and/or Commercial Drivers License (CDL)

5. Physical examination for all CDL licensed drivers is required.
6. Written tests on traffic regulation. Test results should be placed in the driver's file.
7. Driving test - All employees who drive as part of their duties will be given a road test (in traffic) and in the type of vehicle they are expected to drive. Road test results will be documented.

This information collected will be assembled in driver qualification files and maintained for at least ten years.

Driver Training

Our minimum training program includes orientation on company rules and procedures, basic on-the-job training, and continued in-service training based on periodic performance evaluation.

Driver Supervision

Supervisors should be held accountable for safety performance. Supervisors will enforce proper and safe job performance. Lines of communication between managers and drivers will be kept open.

Accident Investigation and Records

Every accident should be reported, investigated and reviewed.

- Each vehicle is equipped with a Vehicle Accident Report Kit. Drivers are required to submit the written accident report to the administrative assistant immediately following their involvement in a vehicle accident.
- A police report will be obtained.

The primary purpose of investigating an accident is to find out its cause and initiate action to eliminate or control similar vehicle accidents. Another purpose is to determine whether the accident is preventable. A preventable accident is one in which the driver fails to exercise reasonable precautions to prevent the accident from occurring. The driver's supervisor is required to investigate all vehicle accidents.

Maintenance

Mechanical failures, while accounting for a small percentage of vehicle accidents, are often quite serious in nature. K.P. Meiring Company has established a procedure, based on intended use, for determining maintenance specifications for new vehicular equipment. Our preventive maintenance plan includes the following:

(Insert company PM guidelines here)

Records should be kept for every vehicle. Records should include the type and serial number of the vehicle, vehicle inspection reports, vehicle maintenance reports, and any information related to an accidents in which that vehicle is involved. The benefits of preventive maintenance include fewer accidents, less "down" time, reduced maintenance, improved driver morale and better sales and public relations.

Fleet Safety Rules

The following are safe driving rules included in our Fleet Safety Program. Arriving safely is more important than arriving on time.

- Driver's physical condition must enable them to efficiently perform their duties.
- Drinking of alcoholic beverages while driving or driving while under the influence of alcohol or drugs is prohibited.
- Drivers must have a valid driver's license for the type of vehicle to be operated and keep the license(s) with them at all times when driving.
- Traffic laws must be obeyed.
- Posted speed limits must be obeyed.
- Speed shall never be faster than at a rate consistent with road, traffic, and weather conditions.
- Never attempt to exercise the right of way. Always let the other driver go first.
- Keep to the right except when overtaking slow-moving vehicles or when getting into a position to make a left turn.
- Always look out for pedestrians. Obey pedestrian right-of-way rules and laws.
- Drivers and all seat occupants must wear seatbelts.

SUBSTANCE ABUSE POLICY

SUBSTANCE ABUSE POLICY STATEMENT

K.P. Meiring Company is committed to providing a safe work environment and to fostering the well being and health of its employees. That commitment is jeopardized when any K.P. Meiring Company employee illegally uses drugs on or off the job, comes to work under their influence, possesses, distributes or sells drugs in the workplace, or abuses alcohol on the job. Therefore, K.P. Meiring Company has established the following policy:

- (1) It is a violation of company policy for any employee to use, possess, sell, trade, offer for sale, or offer to buy illegal drugs or otherwise engage in the illegal use of drugs on or off the job.
- (2) It is a violation of company policy for any employee to report to work under the influence of or while possessing in his or her body, blood or urine illegal drugs in any detectable amount.
- (3) It is a violation of company policy for any employee to report to work under the influence of or impaired by alcohol.
- (4) It is a violation of the company policy for any employee to use prescription drugs illegally, i.e., to use prescription drugs that have not been legally obtained or in a manner or for a purpose other than as prescribed. (However, nothing in this policy precludes the appropriate use of legally prescribed medications.)
- (5) Violations of this policy are subject to disciplinary action up to and including termination.

The goal of this policy is to balance our respect for individuals with the need to maintain a safe, productive and drug-free environment. The intent of this policy is to offer a helping hand to those who need it, while sending a clear message that the illegal use of drugs and the abuse of alcohol are incompatible with employment at K.P. Meiring Company.

It is the responsibility of the company's supervisors to counsel employees whenever they see changes in performance or behavior that suggest an employee has a drug problem. Although it is not the supervisor's job to diagnose personal problems, he/she should encourage such employees to seek help and advise them about available resources for getting help. Everyone shares responsibility for maintaining a safe work place. Co-workers should encourage anyone who has a drug problem to seek help.

EMPLOYEE ASSISTANCE PROGRAM

The company offers an employee Assistance Program (EAP) benefit for employees and their dependents. The EAP provides confidential assessment, referral and short-term counseling for employees who need or request it. If an EAP referral to a treatment provider outside the EAP is necessary, costs may be covered by the employee's medical insurance; but the costs of such outside services are the employee's responsibility.

Confidentiality is assured. NO information regarding the nature of the personal problem will be made available to the supervisors, nor will it be included in the permanent personnel file.

Participation in the EAP will not affect an employee's career advancement or employment, nor will it protect an employee from disciplinary action if substandard job performance continues. The EAP is a process used in conjunction with discipline, not a substitute for discipline.

An employee through self-referral or through referral by a supervisor can access the EAP.

DRUG TESTING

General Procedures: An employee reporting to work visibly impaired will be deemed unable to properly perform required duties and will not be allowed to work. If possible, the employee's supervisor will first seek another supervisor's opinion to confirm the employee's status. Next the supervisor will consult privately with the employee to determine the cause of the observation, including whether substance abuse has occurred. If, in the opinion of the supervisor, the employee is considered impaired, the employee will be sent home or to a medical facility by taxi or other safe transportation alternative - depending on the determination of the observed impairment - and accompanied by the supervisor or another employee if necessary. A drug test may be in order. An impaired employee will not be allowed to drive.

Opportunity to Contest or Explain Test Results: Employees and job applicants who have a positive confirmed test result may explain or contest the result to the Company within five (5) working days after the Company contacts the employee or job applicant and shows him/her the positive test result as it was received from the laboratory in writing.

Confidentiality: The confidentiality of any information received by the employer through a substance abuse testing program shall be maintained, except as otherwise provided by law.

Pre-employment Drug Testing: All job applicants at this Company will undergo testing for the presence of illegal drugs as a condition of employment. Any applicant with a confirmed positive test will be denied employment.

Applicants will be required to submit voluntarily to a urinalysis test at a laboratory chosen by this Company, and by signing a consent agreement will release K.P. Meiring Company from liability.

If the physician, official or lab personnel have reasonable suspicion to believe that the job-applicant has tampered with the specimen, the applicant will not be considered for employment.

This company will not discriminate against applicants for employment because of a past history of drug abuse. It is the current abuse of drugs, preventing employees from performing their jobs properly, that K.P. Meiring Company will not tolerate.

Individuals who have failed a pre-employment test may initiate another inquire with the company after a period of not shorter than six (6) months; but they must present themselves drug-free a demonstrated by urinalysis or other test selected by K.P. Meiring Company.

Employee Testing: K.P. Meiring Company has adopted testing practices to identify employees who use illegal drugs on or off the job or who abuse alcohol on the job. It shall be a condition of employment for all employees to submit to substance abuse testing under the following circumstances:

1. When there is reasonable suspicion to believe that an employee is using illegal drugs or abusing alcohol. "Reasonable suspicion" is based on a belief that an employee is using or has used drugs or alcohol in violation of the employer's policy drawn from specific objectives and articulable facts and reasonable inferences drawn from those facts in light of experience. Among other things, such facts and inferences may be based on, but not limited to, the following:
 - (A) Observable phenomena while at work such as direct observation of substance abuse or of the physical symptoms or manifestations of being impaired due to substance abuse;
 - (B) Abnormal conduct or erratic behavior while at work or a significant deterioration in work performance;

- (C) A report of substance abuse provided by a reliable and credible source;
 - (D) Evidence that an individual has tampered with any substance abuse test during his or her employment with the current employer;
 - (E) Information that an employee has caused or contributed to an accident while at work; or
 - (F) Evidence that an employee has used, possessed, sold, solicited, or transferred drugs while working or while on the employer's premises or while operation the employer's vehicle, machinery, or equipment.
2. When employees have caused or contributed to an on-the-job injury that resulted in a loss of work time, which means any period of time during which an employee stops performing the normal duties of employment and leaves the place of employment to seek care from a licensed medical provider. An employer may send employees for a substance abuse test if they are involved in on-the-job accidents where personal injury or damage to company property occurs.
 3. As part of a follow-up program to treatment for drug abuse.
 4. When a substance abuse test is conducted as part of a routinely scheduled employee fitness-for-duty medical examination that is part of the employer's established policy or that is scheduled routinely for all members of an employment classification or group.

Employees with a confirmed positive test result may, at their option and expense, have a second confirmation test made on the same specimen. An employee will not be allowed to submit another specimen for testing.

If the physician, official, or lab personnel has reasonable suspicion to believe that the employee has tampered with the specimen, the employee is subject to disciplinary action up to and including termination.

Alcohol Abuse on the Job: An employee who is under the influence of alcoholic beverages at any time while on company business or at any time during the hours between the beginning and ending of the employee's work day, whether on duty or not and whether on K.P. Meiring Company business or property or not, shall be guilty of misconduct and is subject to discipline up to and including termination;

An employee shall be determined to be under the influence of alcohol if...

- a. the employee's normal faculties are impaired due to the consumption of alcohol,
- or
- b. the employee has a blood alcohol level of .05 or higher.

Failure to submit to a substance abuse test also is misconduct and also shall be subject to discipline up to and including termination.

LETTER TO ALL EMPLOYEES

The illegal use of drugs and the abuse of alcohol are problems that invade the workplace, endangering the health and safety of the abusers and those who work around them. This company is committed to creating and maintaining a workplace free of substance abuse without jeopardizing valued employees' job security.

To address this problem, our company has developed a policy regarding the illegal use of drugs and the abuse of alcohol that we believe best serves the interests of all employees. Our policy formally and clearly states that the illegal use of drugs or abuse of alcohol or prescription drugs will not be tolerated. As a means of maintaining our policy, we have implemented pre-employment and active employee drug testing. This policy was designed with two basic objectives in mind: (1) employees deserve a work environment that is free from the effects of illegal drug use or alcohol abuse and the problems associated with such, and (2) this company has a responsibility to maintain a healthy and safe workplace.

To assist us in maintaining a safe and healthful workplace, we have an Employee Assistance Program (EAP). The EAP provides employees and their families confidential assessment, referral, and follow-up for personal or health problems.

An employee whose conduct violates this Substance Abuse Policy and who does not accept the help we offer under the EAP will be disciplined up to and including termination.

I believe it is important that we all work together to make this company a drug-free workplace and a safe, rewarding place to work.

Sincerely,

Kenneth P. Meiring
President

**PRE-EMPLOYMENT DRUG TESTING
AND RELEASE FORM**

I hereby consent to submit to urinalysis and/or other tests as shall be determined by K.P. Meiring Company in the selection process of applicants for employment, for the purpose of determining the drug content thereof.

I agree that
(name of physician or clinic)

may collect these specimens for these tests and may test them for forward them to testing laboratory designated by the company for analysis.

I further agree to and hereby authorize the release of the results of said tests to the company. I understand that it is the current use of illegal drugs that prohibits me from being employed at K.P. Meiring Company.

I further agree to hold harmless the company and its agents (including the above named physician or clinic) from any liability arising in whole or part, out of the collection of specimens, testing, and use of the information from said testings in connection with the company's consideration of my application of employment.

I further agree that a reproduced copy of this pre-employment consent and release form shall have the same force and effect as the original.

I have carefully read the foregoing and fully understand its contents. I acknowledge that my signing of this consent and release form is a voluntary act on my part and that I have not been coerced into signing this document by anyone.

Applicant:
Print Name _____ S.S.#:

Applicant:
Signature _____ Date:

Witness Printed Name:

Witness Signature:

**ACTIVE EMPLOYEE
CERTIFICATE OF AGREEMENT**

I do hereby certify that I have received and read the K. P. Meiring Company Substance Abuse and Testing Policy and have had the Drug-Free Workplace Program explained to me. I understand that if my performance indicates it is necessary, I will submit to a substance abuse test. I also understand that failure to comply with a substance abuse test request or a positive result may lead to termination of employment. Nothing in this consent form is to be construed as a contract between the parties.

Name (please print)

Signature

Date

REGULATORY RULES & PROCEDURES

HAZARD COMMUNICATION PROGRAM

FORKLIFT PROGRAM

PERSONAL PROTECTIVE EQUIPMENT

LOCKOUT/TAGOUT

BLOODBORNE PATHOGENS

HEARING CONSERVATION

RESPIRATORY PROTECTION

CONFINED SPACE ENTRY

(ADD OTHERS AS THE POLICIES & PROGRAMS ARE DEVELOPED)

HAZARD COMMUNICATION PROGRAM

HAZARD COMMUNICATION PROGRAM

I. POLICY

It is *K.P. Meiring Company's* policy to provide a safe and healthful workplace for all of our employees.

Our policy requires informing employees and, where appropriate, customers, carriers, contractors, government agencies, former employees, other producers and the public of know health or environmental hazards of chemicals utilized in our manufacturing process.

II. PURPOSE

The purpose of this hazard communication program is to inform *K.P. Meiring Company* employees and contractors are informed concerning existing and potential workplace safety and health hazards from chemicals know to be present in the workplace in such a manner that employees may be exposed under normal conditions of use and/or in a foreseeable emergency.

This hazard communication program relies on Material Safety Data Sheets (MSDS) from suppliers for purposes of hazard determination.

III. PROGRAM SUMMARY

The major elements of this program are as follows:

- a) Labels and other forms of warning
- b) Material Safety Data Sheets (MSDS) from suppliers
- c) Employee information and training
- d) List of hazardous chemicals known to be present in the workplace
- e) Methods for informing employees of hazards of non-routine tasks.
- f) Methods for informing contractor employers of hazards their employees may be exposed to while working in the *K.P. Meiring Company's* shop.

IV. LABELS AND OTHER FORMS OF WARNING

A. Each container of hazardous chemicals shall be labeled, tagged, or otherwise marked with:

1. the identity of the hazardous chemicals and
2. appropriate hazard warnings

B. Labels and other forms of warning will be legible and in English, and will be prominently displayed or readily available in the work area during each shift.

V. MATERIAL SAFETY DATA SHEETS

A. A material safety data sheet (MSDS) will be kept for each hazardous chemical known to be present in the workplace. They are kept in the shop and are readily accessible by employees during each work shift.

B. The *(Department Title)* is responsible for maintaining the MSDS's in a complete and up-to-date manner.

C. When work is shipped to customers, copies of MSDS's for any known hazardous chemicals included as part of the products shipped will be passed along to the customer.

VI. TRAINING & INFORMATION

A. Employees shall be trained according to a written hazard communication-training plan that is part of the company's overall hazard communication program.

B. Training shall extend to non-routine tasks, as necessary, and to foreseeable emergencies.

C. When contractor employees are required to work in our shop, the contractor employee will be advised of the provisions of our company's hazard communication program. Contractor employees shall be provided ready access to the MSDS and list of hazardous materials.

HAZARD COMMUNICATION TRAINING PROGRAM

I. INITIAL ASSIGNMENT INFORMATION AND TRAINING

A. The *(Department Title Name)* will train new employees in hazard communication and protection procedures as part of their general safety orientation before the new employees begin work.

B. The *(Department Title Name)* is responsible for training affected employees whenever new hazardous chemical are introduced into the workplace. This responsibility extends to providing additional training, as required, for existing employees reassigned into new positions.

C. All current employees shall be trained in the elements of *K.P. Meiring Company*'s hazard communication program by *(Insert date) 199__*.

II. CURRICULUM

A. All employees shall be provided with the following information:

1. Employees shall be informed that *K.P. Meiring Company* is required by law to have a chemical hazard communication program.

2. Employees shall be informed of the details of *K.P. Meiring Company*'s chemical hazard communication program including:

a. The location and availability of a list of all hazardous chemicals used by *K.P. Meiring Company*.

b. A list of all hazardous chemicals know to be present in the work area and Material Safety Data Sheets (MSDS) are kept in the shop and is available for review by employees during each work shift.

c. The recognition, evaluation and control of these hazardous chemicals and procedures to follow if employees are exposed to these chemicals.

d. Specific operations or tasks in the employee's work areas that use hazardous chemicals.

B. All employees shall receive training as follows:

1. Employees shall be trained in methods and observations to detect the presence of hazardous chemicals.
2. Employees shall be trained regarding the specific physical and health hazards of known hazardous chemicals in the employees' work area.
3. Employees shall be trained in protective measures including the use of personal protective equipment and protective measures implemented by K.P. Meiring Company including work procedures.
4. Employees shall be trained in understanding, interpreting and using hazard information provided on labels and in MSDS.

C. Effective (*Date*)199__, all *K.P. Meiring Company* employees are required to successfully complete *K.P. Meiring Company*'s hazard communication training program. Employees are required to follow safe and healthy work practices as a condition of employment.

III. NON-ROUTINE TASKS

Training for hazard protection during non-routine tasks is the responsibility of the (*Department Title*) Manager and shall be provided as needed.

IV. FORESEEABLE EMERGENCIES

Training for hazard protection during foreseeable emergencies (such as fires, floods, tornadoes, spills, etc.) shall be provided to all affected employees as part of their general safety training.

V. CONTRACTOR EMPLOYEES

The employer of outside personnel required to work in our shop shall be informed of our hazard communication program. While the contractor is responsible for its own employees' training, *K.P. Meiring Company* will attempt to answer contractor employees' questions about workplace hazards.

The MSDS and list of hazardous materials shall be available to contractor employees as well.

K.P. Meiring Company
1715 Lakeside Avenue # 5
Saint Augustine, FL 32084

(Date)

(Supplier's Name)
(Address)

Dear Supplier:

Our company has purchased your product, (name of chemical or product), but we do not have a Material Safety Data Sheet (MSDS) for it.

As you probably are aware already, you are required under OSHA's Hazard Communication Standard, 29 CFR 1910.1200, to perform hazard determinations, label containers, and provide users with the MSDS for all hazardous chemicals which you produce or import.

We are required by the same law to have your MSDS on file for our employees' review. Please provide us with a copy of the MSDS for the product(s) named above as soon as possible.

Thanking you in advance for your prompt response.

Sincerely,

Keep a copy of this letter in the MSDS file until the missing sheet is provided. Follow-up letters and dated records of telephone inquiries, also, should be maintained to prove your efforts at obtaining missing information.

FORKLIFT PROGRAM

POWERED FORKLIFT PROGRAM WITH CHECKLIST

A. OBJECTIVES

To establish guidelines to reduce the potential for employee injury and to comply with all applicable standards and regulations.

B. SCOPE

All operators of Forklift trucks and their supervisors. Program components will include:

- Training
- Inspection
- Safety Rules
- Training Sources

C. REFERENCES

Federal, State and Local Standards, e.g., OSHA, State Labor Codes, and Manufacturer's specifications.

D. TRAINING

No person shall operate a powered forklift until they have been trained. Training for each location shall conform to the following National Institute for Occupational Safety and Health (NIOSH) outline.

I. HANDS-ON EXPERIENCE

- In the faculty

II. TRAINING

- Difference between powered forklift trucks and cars, and between sidewalk pedestrians and plant pedestrians
- Truck operating controls and safety devices
- Attachments
- Inspections
- Picking up the load
- Traveling
- Setting load down
- Loading and unloading boxcars and highway trucks.
- Leaving the truck
- Refueling and recharging
- Restricted uses of trucks
- Maintenance and repair

- Hazardous materials and areas (if appropriate)

E. INSPECTION

It is our policy that all forklift operators must check the vehicle they are operating at the start of the shift. If the vehicle is found to be unsafe, it must be reported to the manager immediately. No forklift will be operated in an unsafe condition.

The forklift operator must utilize the "Forklift Inspection Report" form. These reports shall be turned into the supervisor at the end of the day.

F. FORKLIFT SAFETY RULES

- Only drivers authorized by the company and trained in the safe operation of forklift trucks or pickers shall be permitted to operate such vehicles. Drivers shall not operate trucks other than those for which they are authorized. Trainees may be authorized to operate trucks provided they are under supervision.
- Drivers shall check the vehicle at least once per day and if it is found to be unsafe, the matter shall be reported immediately to a manager or mechanic, and the vehicle shall not be put into service again until it has been made safe. Attention shall be given to the proper functioning of tires, horns, lights, battery, controller, brakes, steering mechanism, and the lift system of fork lifts (fork chains, cable, and limit switches).
- Vehicle shall not exceed the authorized or safe speed, always maintaining a safe distance from other vehicles, and all established traffic regulations shall be observed. For trucks travelling in the same direction, a safe distance may be considered to be approximately 3 truck lengths or preferably a time lapse of 3 seconds before passing the same point. Exercise extreme care when cornering. Sound horn at blind corners.
- No riders shall be permitted on vehicles.
- Stunt driving and horseplay are prohibited.
- Loaded vehicles shall not be moved until the load is safe and secure.
- When leaving a vehicle unattended, the power shall be shut off, brakes set, the mast brought to the vertical position, and the forks left in the down position. When left on an incline, the wheels shall be locked.

NOTE: A powered forklift truck is unattended when the operator is 25 ft. or more away from the vehicle that remains in his or her view, or whenever the operator leaves the vehicle and it is not in his or her view.

- When the operator is dismounted and within 25 feet of the truck still in his or her view, the load engaging means shall be fully lowered, control neutralized, and the brakes set to prevent movement.
- Trucks shall not be driven up to anyone standing in front of a bench or other fixed object of such size that the person could be caught between the truck and the object.
- Operators shall look in the direction of travel and shall not move a vehicle until certain that all persons are in the clear.
- Vehicles shall not be operated on floors, sidewalk doors, or platforms that will not safely support the vehicle, empty or loaded. Any damage to forklift trucks and/or structures shall be reported immediately to the manager. Additionally, doors adjacent to the path of vehicles should be marked and secured where possible.

- Employees shall not ride on the forks of the lift trucks.
- The forks shall always be carried as low as possible, consistent with safe operation.
- Extreme care shall be used when lifting loads.
- Vehicles shall not be driven in and out of highway trucks and trailers at unloading docks until such trucks are securely blocked and brakes set.
- Employees shall not place any part of their body outside the running lines of the forklift truck or between mast uprights or other parts of the truck where shear or crushing hazards exists.
- Employees shall not be allowed to stand, pass, or walk under the elevated portion of any forklift truck loaded or empty, unless it is effectively blocked to prevent it from falling.
- The width of one tire on the forklift shall be the minimum distance maintained by the truck from the edge while it is on any elevated dock, platform or freight car.
- Trucks shall not be loaded in excess of their rated capacity.
- No truck shall operate with a leak in the fuel system.
- Extreme care should be taken when tilting loads. Elevated loads shall not be tilted forward except for when the load is being deposited onto a storage rack or equivalent. When stacking or tiering, backward tilt shall be limited to that necessary to stabilize the load.
- The load-engaging device shall be placed in such a manner that the load will be securely held or supported.
- Special precautions shall be taken in the securing and handling of loads by trucks equipped with attachments, and during the operation of these trucks after the loads have been removed.
- **NO SMOKING WHILE OPERATING OR REFUELING FORKLIFTS**

G. TRAINING SOURCES

There are many sources for training forklift operators. Use those that are the most cost efficient, provided they train in accordance with the applicable OSHA standard.

FORKLIFT INSPECTION

OPERATOR: _____

DATE: _____

FORKLIFT IDENTIFICATION: _____

	OK	DEFECTIVE	DATE CORRECTED
1. Tires (for cuts, gouges, imbedded objects, and air pressure for pneumatic tires).	_____	_____	_____
2. Steering	_____	_____	_____
3. Foot brake	_____	_____	_____
4. Parking brake	_____	_____	_____
5. Hydraulic system	_____	_____	_____
6. Controls	_____	_____	_____
7. Chains/limit switches	_____	_____	_____
8. Mast, carriage, and attachments (for damaged, loose, missing bolts, or unusual wear on chain guides and insides of mast channels).	_____	_____	_____
9. Forks and fork adjusting slides	_____	_____	_____
10. Name plate, markings, and load limits	_____	_____	_____
11. Operating and warning lights	_____	_____	_____
12. Clutch or creeper control	_____	_____	_____
13. Overhead guard	_____	_____	_____
14. Battery connections and level	_____	_____	_____
15. Fuel line (for leaks and damage)	_____	_____	_____
16. Exhaust system (for sparks, leaks)	_____	_____	_____
17. Directional signals	_____	_____	_____
18. Back up alarm device	_____	_____	_____
19. Dead man brake (seat actuated)	_____	_____	_____
20. Engine coolant level	_____	_____	_____
21. Engine oil level	_____	_____	_____
22. Seat belt/lap bar	_____	_____	_____
23. Shift linkage	_____	_____	_____
24. Other (loose articles, materials on truck, etc.)	_____	_____	_____

COMMENTS: _____

PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT POLICY

Purpose: This policy is the certification, required by OSHA Standard CFR 29 1910.132, which identifies the workplace assessment made to determine if there are hazards that would require the use of personal protective equipment (PPE).

This assessment was performed at _____, by _____, on _____.

GENERAL HAZARDS

Using PPE requires hazard awareness and training on the part of the user. The use of the PPE does not eliminate the hazard. If the equipment fails, user exposure will occur. To reduce the possibility of failure, this company will ensure the equipment is properly fitted and maintained in a clean and serviceable condition.

Selection of the proper piece of PPE for the job is important. A workplace assessment of this company's operations has been made. Listed below are the types of PPE required by your employer while working in the below described departments and operations.

(The following categories should be used as a guide in establishing your own company's policies regarding PPE use. They are set up in "menu" fashion and can be picked and chosen as the need fits your operations. Delete what you do not need and add personal protective equipment as is needed based on the assessment done of the shop area.)

Head Injuries

Falling or flying objects, bumping your head against a fixed object, or by electrical shock, causes Head injuries. Protective helmets must be used when employees are in areas where there is a potential for injury to the head from these hazards. Protective helmets designed to reduce electrical shock must be used when employees are near exposed electrical conductors that could contact the head. One or more of these hazards are present while working on a jobsite. Hard hats, made to resist penetration and to absorb the shock of a blow, are required to be worn by employees, supervisors and visitors either working in or entering the jobsite.

Protective helmets purchased after July 5, 1994, must comply with ANSI Z89.1-1986 "American National Standard for Personnel Protection - Protective Head-wear for Industrial Workers—Requirements." Protective helmets purchases before July 5, 1994, must comply with ANSI Z89.1-1969 "American National Standard Safety Requirements for Industrial Head Protection."

Eye Injuries

Eye injuries are caused by a number of hazards including flying objects that can get into the eye, dust particles, liquid splashes, glare, and radiation. Protective eye or face protection must be used when employees may be exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.

Employees whose vision requires the use of prescription lenses and who must wear eye protection must wear one of the following: eye protection that incorporates the prescription in its design, or eye protection that can be worn over the prescription lenses without disturbing the position of either the prescription or protective lenses.

Safety glasses equipped with side shields (detachable side shields are acceptable) prevent injuries to the eye from flying objects and dust particles, and must be worn (*identify the areas where this will be required*). Safety goggles are designed to prevent injury to the eyes from chemical splashes and are required to be worn in (*identify the areas where this will be required*). Welder's helmets and/or goggles

protect against glare and radiation hazards while performing welding, cutting and brazing tasks and are required to be worn during those operations.

Foot Protection

Foot injuries are caused when there's a risk of injury from objects falling or rolling on to the foot or piercing the sole. Protective footwear must be worn when employees are in areas where there is a danger of foot injuries due to falling and rolling objects, or objects piercing the sole, and where employee's feet are exposed to electrical hazards. These hazards exist in the following areas: *(identify those areas where these hazards exist)*. Safety shoes are required in these areas.

In general, safety footwear should be sturdy and have an impact-resistant toe. The degree of impact-resistance you need depends on the job and the hazards. Steel toed safety shoes are required by those jobs, which require you to handle heavy materials that could be dropped. Compression protection (metatarsal guards) is required if you work around heavy objects that could roll over your feet.

Hand Protection

Hand injuries are caused by burns, cuts, hazardous chemical contact and/or electrical shock. Employees must use appropriate hand protection (gloves) when the employee's hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes. These hazards exist in the following areas: *(identify those areas where these hazards exist)*. Hand protection *(identify what type is to be worn)* is required in these areas.

Hearing Protection

High noise levels, those measured over 90 decibels, are experienced in the *(list department where noise levels exceed 90 decibels)* department (s). Earplugs and earmuffs are provided to employees working with this equipment. Their use is mandatory to protect your ears from noise damage.

Respiratory Protection

Respiratory protection is needed for those tasks or jobs that pose a risk of inhaling harmful dusts, fogs, mists, gases, smoke or vapors. One or more of these hazards are present in the *(identify department)* department.

(List type of respirators used) respirators are provided to filter out the dangerous substances in this department and are required to be worn by employees working there. They are provided to provide clean air to breathe while performing *(identify the tasks or jobs being performed which require the use of respirators)* and are required to be worn by employees performing them. Employees required to wear respiratory protection will go through careful fit testing procedures. The fit testing makes sure the respirator seals out contaminants and allows you to move around while you're working.

CONCLUSION

In conclusion, selection of the proper piece of personal protective equipment for the job is important. Employees must understand the equipment's purpose and its limitations. The equipment must not be altered or removed (even though an employee may find it uncomfortable). It is a violation of company policy and safety rules to modify or refuse to wear the required PPE. Violations will result in disciplinary action up to and including termination.

LOCKOUT/TAGOUT PROGRAM

LOCKOUT SAFETY PROGRAM COMPANY LOCKOUT POLICIES

PURPOSE AND USE

Employee safety is our company's top priority. Effective lockout procedures will protect employees during equipment servicing and repair. Lockout procedures must be used whenever machine servicing or maintenance requires an employee to bypass machine safeguarding, exposing him or her to unexpected machine movement, start-up, or release of stored energy (i.e. electric, mechanical or pneumatic).

BASIC LOCKOUT RULES

These basic rules apply to all aspects of our company's lockout safety program:

1. All equipment must be locked out during servicing and maintenance when employees are exposed to injury from accidental start-up or machine movement.
2. Do not attempt to operate any locked out switch, valve, or other energy-isolating device.
3. The work area shall be checked to ensure that all employees have been safely positioned or removed prior to de-energizing and energizing equipment.

LOCKOUT HARDWARE

Every employee authorized to perform lockout procedures will be assigned the lock(s) he or she needs to safely lock out and repair company equipment. Each lock used for lockout shall identify the department using it.

The locks have been color coded by department. The authorized employees of each department will use the lock color coded for their department.

The lock color codes are as follows:

Red.....Foreman
Blue.....Maintenance
Green.....Safety Committee
Yellow.....Management

The company will purchase all lockout hardware, and employees will be responsible for using it properly. Lockout hardware shall be used only for lockout--not for toolboxes, lockers, or for any other reason. Lockout hardware is intended solely for the purpose of holding energy isolating devices in a "safe" or "off" position.

ENFORCEMENT AND INSPECTION OF LOCKOUT PROCEDURES

ENFORCEMENT POLICY

Our company is required by Occupational Safety and Health Administration (OSHA) to enforce the use of lockout procedures. Any employee who intentionally fails to follow lockout procedures will face disciplinary action. Violation of lockout procedures will be handled in the same manner as any other violation of safety rules, and may include a reprimand, probation, suspension or dismissal.

INSPECTION POLICY AND SCHEDULE

The purpose of lockout inspection is to ensure that procedures are being used properly and that they result in the safe control of hazardous energy. All company supervisors and production or maintenance managers (who shall be trained as authorized employees) are responsible for inspecting the use of lockout procedures on an ongoing basis.

Formal inspections will take place annually. An authorized employee other than the one(s) utilizing the energy control procedures being inspected shall perform inspections. Annual inspections will involve all authorized employees performing lockout controls on their equipment.

The supervisor for each production or maintenance area where lockout is used shall inspect the use of lockout procedures by authorized employees under his/her supervision.

The lockout procedure inspection form on the next page shall be used to conduct and document all formal lockout inspections.

LOCKOUT INSPECTION REPORT

DATE: _____ INSPECTOR:

Employee(s) Involved:

Equipment Involved:

Are changes in lockout procedure recommended? If so, explain:

Changes adopted (Y/N): _____ If not, why:

Lock responsibilities reviewed with each authorized employee performing lockout controls

(Y/N):

Retraining required for (List Names): Retraining completion dates:

Certification:

I hereby certify that inspection of lockout procedures for the equipment and individuals listed above was performed on _____.

Signature / Date

Name/Title of Inspector

EQUIPMENT REPLACEMENT, REPAIR, AND MODIFICATION

To meet OSHA requirements and provide equipment capable of being locked out effectively and safely, controls that can accept locks and lockout devices must be installed, whenever:

1. New equipment is purchased and installed
2. Existing equipment is rebuilt or undergoes major modifications
3. Any energy isolating devices (switches, valves, etc.) are required or added to equipment

This policy applies to production machinery, auxiliary equipment, and any other devices or machines that must be locked out during servicing or repair to prevent accidental machine movement or start-up that could injure employees.

LOCKOUT PROCEDURES

The following general procedures shall be used to lock out equipment, and to return machines to production. Machine-specific procedures shall be developed that follow these general procedures.

GENERAL PROCEDURES FOR ALL EQUIPMENT

1. Be prepared for lockout. Be familiar with the sources of hazardous energy for the equipment that will be serviced.
2. Notify affected employees that the machine is about to be shut down and locked out.
3. Shut down the machine and any other auxiliary equipment that could pose a hazard during servicing.
4. Isolate energy sources. Cut off electrical power. Operate valves to isolate air or hydraulic lines. Take any other steps necessary to control other hazardous energy sources.
5. Apply locks to all switches, valves, or other devices operated in step four.
6. Block or dissipate stored energy in rams, springs, pneumatic or hydraulic systems, etc.
7. After ensuring that no personnel are exposed, verify lockout by testing machine operating controls. (Caution!! Return all controls to the "off" or "safe" position.)
8. Notify safety coordinator of the lockout so it can be recorded in lockout log book.
9. Complete machine maintenance report, lockout report.

MACHINE MAINTENANCE LOCKOUT REPORT

MACHINE NUMBER

SUPERVISOR RESPONSIBLE

DATE STARTED

DATE COMPLETED

LOCKED OUT? YES ___ NO

REASON:

MAINTENANCE PERFORMED:

MAINTENANCE: _____

DATE:

SUPERVISOR: _____

DATE:

REMOVING LOCKOUTS

1. Remove tools and unnecessary equipment from the machine and work area.
2. Inspect the machine and its components. Make sure the equipment is ready to be operated.
3. Make sure all workers are away from machine.
4. Remove all locks, blocks, or other energy restraints.
5. Notify affected employees that lockouts have been removed and that the machine is ready to be operated.
6. Restore energy to the machine by operating all switches, valves, etc., that were previously locked out.
7. Notify safety coordinator of machine being unlocked so it can be recorded in lockout logbook.
8. Complete and file lockout report.

MACHINE-SPECIFIC PROCEDURES

The following pages list the specific lockout procedures that shall be used for each piece or type of equipment used in our company. (Photocopy lockout procedure sheets as needed.)

MACHINE SPECIFIC LOCKOUT PROCEDURES

MACHINE IDENTIFICATION:

1. Be prepared for lockout. Be familiar with the sources of hazardous energy for the equipment that will be serviced.

SOURCES OF HAZARDOUS ENERGY (check all that apply)

Electrical Pneumatic Chemical
 Mechanical Thermal Hydraulic

2. Notify affected employees that the machine is about to be shut down and locked out.
3. Refer to maintenance memo for machine specifics.
4. Shut down the machine and any other auxiliary equipment that could pose a hazard during servicing.
5. Isolate energy sources. Cut off electrical power. Operate valves to isolate air or hydraulic lines. Take any other steps necessary to control other hazardous energy sources.
6. Apply locks to all switches, valves, or other devices operated in step four.
7. Block or dissipate stored energy in rams, springs, pneumatic or hydraulic systems, etc.
8. Verify lockout by testing machine operating controls. (Caution! Return all controls to the "off" or "safe" position after testing.)

CORD AND PLUG CONNECTED EQUIPMENT

Potentially hazardous energy in cord and plug connected equipment must be controlled. Employees shall protect themselves while working on cord and plug connected equipment by doing the following:

1. Unplug equipment from electrical socket.
2. Place a lockable cover over the plug.
3. Place lock on the plug cover.
4. Lock out or control any other sources of hazardous energy that could cause injury during servicing.

REMOVAL OF ABSENT EMPLOYEE'S LOCK (S)

No employee shall remove another department's lock without management approval. If an employee is not present to remove his or her lock from a machine, company managers or supervisors must take the following steps:

1. Verify that the authorized employee who locked out the equipment are not on plant property.
2. Attempt to contact the authorized employee to inform him/her that his/her lock will be removed from the machine.
3. Remove the lock according to standard procedures.
4. Make sure the employee is notified that his/her lock has been removed before he/she resumes work at the facility.

OUTSIDE CONTRACTORS

If employees of outside contractors perform servicing or maintenance that requires lockout at our company, the supervisor or manager overseeing the work must:

1. Inform the outside contractor of our company's lockout procedures
2. Obtain a copy or description of the outside contractor's lockout procedures
3. Ensure that company employees understand and comply with the restrictions and prohibitions of the outside contractor's lockout procedures

EMPLOYEE TRAINING

For lockout training purposes, our company's employees shall be divided into three groups: authorized, affected, and other employees. Each group will receive training that meets or exceeds, OSHA training requirements.

AUTHORIZED EMPLOYEES

Authorized employees are either the people who perform machine maintenance and servicing that requires lockout, or the safety committee, foreman, and upper management personnel. They are the only individuals who will lock out equipment. Authorized employees will learn when lockout is and is not required. They shall receive training covering:

1. Recognition of hazardous energy sources
2. Types and amounts of hazardous energy in the workplace
3. Methods, devices, and procedures used to control hazardous energy on company equipment, including cord and plug connected equipment if it is to be locked out
4. Procedures for removing lockouts and returning equipment to operation
5. Transfer of lockout responsibilities
6. Group lockout procedures (if necessary)

A Hazardous Energy Source (Lockout/Tagout)" training video will be used to provide training. Authorized employees will receive additional training regarding how specific lockout procedures are used on the different types of equipment used in our company and if necessary, they will be taught group lockout procedures.

Authorized employees will receive retraining in lockout procedures whenever there is a change in:

1. Job assignment(s) that exposes an authorized employee to new hazards or lockout procedures
2. Machines, equipment, or processes that present a new hazard or requires modified lockout procedures
3. Lockout procedures for a piece or type of equipment

Retraining is also required when it becomes known that an employee incorrectly performs lockout procedures or when an inspection of lockout procedures reveals that an employee is not following company lockout procedures.

All training and retraining shall be documented and certified. The next page identifies the form completed and filed in the lockout-training book for all authorized employees.

**LOCKOUT SAFETY PROGRAM
AUTHORIZED EMPLOYEES**

Individuals with names and/or job titles listed below are authorized to perform lockout procedures on our companies equipment.

Date of training:

Instructor:

Title:

AFFECTED EMPLOYEES

Affected employees are those individuals who work in areas where lockout may take place. They shall not perform lockout procedures, nor shall they service or repair any locked out equipment.

Affected employees may, however, perform servicing or maintenance under the protection of normal machine safeguarding which protects them from injury due to accidental machine movement or start up. For example, affected employees may be allowed to perform die changes in some cases, but not others.

Affected employees shall be trained so that they are aware of the purpose and use of lockout procedures. They will learn when lockout is required, and when it is not. Affected employees will also be made aware of any special rules or prohibitions associated with outside contractor lockout procedures.

Training for affected employees shall be accomplished by using a "Hazardous Energy Source (Lockout/Tagout)" training video.

Affected employees will receive retraining in lockout policies whenever there is a change in:

1. Job assignment(s) that exposes an affected employee to new hazards or lockout procedures
2. Machines, equipment, or processes that presents a new hazard or requires modified lockout procedures
3. Lockout procedures for a piece or type of equipment

Retraining is also required when it becomes known that an affected employee is not following company lockout policies.

All training and retraining shall be documented and certified. The next page identifies the form completed and filed in the lockout-training book for all affected employees.

**LOCKOUT SAFETY PROGRAM
AFFECTED EMPLOYEES**

Individuals with names and/or job titles listed below are recognized as affected employees in our company's lockout safety program.

Date of Training:

Instructor:

Title:

OTHER EMPLOYEES

Other employees are those whose work may require them to be in areas where lockout is used. These employees shall be made aware of what lockout is, and that they should never attempt to operate a machine that is locked out.

All lockout training for other employees shall be documented and certified. The following page identifies the form completed and filed in the lockout training book for all other employees.

Training for other employees shall be accomplished by using A Hazardous Energy Source (Lockout/Tagout)" training video.

Individuals with names and/or job titles listed below are recognized as other employees in our company's lockout safety program.

Date of Training:

Instructor:

Title:

AUTHORIZED EMPLOYEE LOCKOUT PROCEDURE TEST

EMPLOYEE NAME _____

DATE _____

Instructions: Circle the correct answer for each question. After completing the test and reviewing your answers, give it to your instructor.

1. Only Authorized Employees are allowed to lock out equipment and machinery.
A. True
B. False

2. If three people are working on the same piece of equipment, only one person has to put his or her lock on the energy isolating switches, valves, or other devices.
A. True
B. False

3. A machine must be locked out if safeguarding is removed or bypassed when servicing.
A. True
B. False

4. If an employee repairs a machine but forgets to remove his/her lock before going home, only a supervisor may remove the lock.
A. True
B. False

5. It is not important to notify affected co-workers before you lockout equipment.
A. True
B. False

6. You must make sure all tools are removed and machine components are ready for operation before taking off locks and starting a machine that has been repaired.
A. True
B. False

7. Most machines have more than one source of hazardous energy that will require locking out, blocking, or dissipation.
A. True
B. False

8. Authorized employees can protect themselves while working on cord and plug connected equipment by placing a lockable cover over the plug or by keeping the plug in view and at arm's reach.
A. True
B. False

9. Before commencing work on equipment, operating controls should be tested after being locked out to confirm the machine is safe.

- A. True
- B. False

10. Routine and repetitive machine servicing that occurs with safeguarding in place also requires the use of lockout procedures.

- A. True
- B. False

11. When working with an outside contractor, you must be knowledgeable of their lockout procedures.

- A. True
- B. False

BLOODBORNE PATHOGEN

BLOODBORNE PATHOGEN PROGRAM

I. SCOPE

This policy is designed to protect first aid trained volunteers from health hazards that may be encountered through contact with blood or other body fluids while administering first aid or cardiopulmonary resuscitation (CPR).

The policy applies to First Aid Trained Volunteers who provide immediate aid to an injured or ill employee until professional emergency medical services arrive.

A copy of this policy and the OSHA regulations (29 CFR 1910.1030) (Exhibit C) must be provided to each First Aid Trained Volunteer.

II. RESPONSIBILITIES

A. CORPORATE SAFETY

1. Provide guidelines for development of the Bloodborne Pathogens Program.
2. Monitor and audit development, implementation and operation of the Program.
3. Monitor compliance on a continuing basis through periodic audits.

B. DIVISION MANAGER

1. Ensure that all first aid safety equipment (gloves, resuscitators, face masks, etc.) are available, in good condition and used as required.
2. Ensure that all First Aid Trained Volunteers receive the required annual training.
3. Ensure that all records are prepared, kept and maintained in accordance with the Program as outlined in this policy.
4. Ensure that the Bloodborne Pathogens Program is reviewed and updated on an annual basis.
5. In the event a First Aid Trained Volunteer comes into contact with blood or other body fluids, follow the steps outlined in Section III D1. and 2. of this policy.
6. In the event a First Aid Trained Volunteer has any medically related complaints allegedly related to their first aid duties, follow the steps outlined in Section III. D.3. of this policy.

C. FIRST AID TRAINED VOLUNTEERS

1. Use personal protective equipment in all situations where there may be the possibility of exposure to blood or other body fluids.
2. Report any incident where there has been contact with blood or other body fluids to the Division/Facility Safety Manager.

III. EXPOSURE CONTROL PLAN

A. GENERAL

1. Tasks, Procedures, Job Classification

Since the nature of our business is distribution, blending or manufacturing, this program has been developed and implemented only for those employees who act as "First Aid Volunteers". These employee volunteers are trained, usually by the Red Cross, and provide first aid in the event an employee or visitor becomes injured or ill. Normally, the procedures involved include basic first aid to stabilize the injured or ill person until the arrival of the local emergency medical services.

2. Exposure Determination

The maximum extent of exposure to bloodborne pathogens is during the act of providing basic first aid to stabilize the injured or ill person until the arrival of the local emergency medical services

3. Hepatitis B Vaccination

Pre-exposure (to bloodborne pathogens) hepatitis B vaccination is not required. Post-exposure vaccination is to be made available on a voluntary basis. –
See Section III.D.

First Aid Trained Volunteers who choose not to be vaccinated must sign a declination form –
Exhibit A. These volunteers may later opt to receive the vaccine at no cost.

B. PERSONAL PROTECTIVE EQUIPMENT

1. General

- a. Each facility is provided with a first aid kit.
- b. Each first aid volunteer is to be provided with personal kit containing latex gloves, face shield, and resuscitator.

2. Use

- a. In any situation where there is a possibility of exposure to blood or other body fluids, gloves and face shield must be worn.
- b. In any situation where CPR is administered, the resuscitator must be used.

C. WASTE DISPOSAL

- 1. Any personal protective equipment, bandages, medical supplies or equipment contaminated by blood or other body fluids are to be given to the outside Emergency Medical Service personnel for their disposal.
- 2. First Aid Trained Volunteers are to immediately wash their hands after removal of gloves or other personal protective equipment.

D. POST EXPOSURE EVALUATION AND TREATMENT

1. Any contact with blood or other body fluids must be immediately reported to the Division/Facility Safety Manager/Coordinator.
2. Details of the incident are to be recorded by the First Aid Trained Volunteer on the Exposure Incident Report - Exhibit B. This report is to be returned to the Division/Facility Safety Manager/Coordinator.
3. In the event a First Aid Trained Volunteer experiences any medical complaints, allegedly related to their first aid duties, a confidential medical evaluation, including blood tests, any available post-exposure preventative treatment and follow-up counseling is to be made available through the local medical facility.

The evaluating physician's written opinion must be provided within fifteen days. This opinion is sent to the Company and given to the employee. This opinion is **ONFIDENTIAL** and is to contain only information concerning the need for Hepatitis B vaccination and whether or not the that the employee has been informed about any possible medical condition resulting from the exposure which requires further evaluation or treatment.

IV. TRAINING

Blood borne Pathogens training is to be conducted on an annual basis: usually in conjunction with first aid or CPR training.

When arranging this annual training, the required elements listed below must be covered and certification must be provided. A copy of the certification is to be maintained in each First Aid Trained Volunteer's personnel file.

The training is to include:

- A. A general explanation of the epidemiology and symptoms of blood borne diseases.
- B. An explanation of how blood borne pathogens are transmitted.
- C. An explanation of this policy (exposure control plan) and the OSHA regulations and providing the employee with a copy of them.
- D. An explanation of the appropriate methods for recognizing activities that may involve exposure to blood and other potentially infectious materials.
- E. An explanation of the methods to reduce exposure including appropriate engineering controls, work practices and personal protective equipment.
- F. Information on the types proper use, location, handling, documentation and disposal of personal protective equipment.
- G. An explanation of the reasons for selection of particular types of personal protective equipment.
- H. Information on the Hepatitis B vaccine, including information on its effectiveness, safety, method of administration, the benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge.
- I. Information on the appropriate actions to take and persons to contact in any emergency involving blood or other body fluids.

- J. An explanation of the procedure to follow if exposure occurs, including the method of reporting the incident and the medical follow-up that will be made available.
- K. Information on post-exposure evaluation and follow up that the Company will provide following an exposure incident.
- L. An explanation of the Biohazard warning symbol.
- M. An opportunity for questions and answers with the person conducting the training session.

V. RECORDING

A. Medical records required by this Program must be kept confidential and maintained for the duration of the first aid volunteer's employment plus thirty years. These records are to be made available to the employee and to anyone having written consent from the employee. (See Corporate Safety Manual Policy No. 11.3 Employee Medical and Exposure Records).

B. Exposure Incident Reports (Exhibit B) are to be retained as described in Section A above.

Training records, including copies of certification of Blood borne Pathogens training are to be retained at least three years. These records are to include:

1. Date of training
2. Content of training
3. Trainer's name and qualifications
4. Name and job titles of those attending

VI. ANNUAL PROGRAM REVIEW AND UPDATE

This program is to be reviewed and updated on an annual basis to ensure that:

- A. All personnel are in place, properly equipped and trained, aware of and discharging their responsibilities.
- B. All necessary equipment is available and properly maintained.
- C. All program procedures are current, still appropriate, and properly being executed.
- D. All records are being maintained on a current basis and in an accurate up-to-date manner.
- E. All training materials are current and all necessary personnel are trained (or re-trained, as the case may be) on an annual basis.

EXHIBIT A

AUTHORIZATION FOR HEPATITIS B VACCINATION

I Understand That Under OSHA Regulation 29 CFR 1910.1030, "Occupational Exposure to Blood borne Pathogens", I am eligible to receive the Hepatitis B vaccination series.

The vaccination series consists of three doses of vaccine given according to the following schedule:

First Dose:	At elected date
Second Dose:	One month later
Third Dose:	Six months after the first dose

Warning: Persons with the following health concerns/problems should not take Hepatitis B vaccine without first checking with a physician:

- Anyone currently ill with something more serious than a cold.
- Anyone for whom fever or other side effects might pose risk of chronic heart or lung condition.
- Pregnant women must first consult obstetrician.

Should you have any questions about Hepatitis B or Hepatitis B vaccine, you should consult with your own physician before your sign this form.

HEPATITIS B VACCINE AUTHORIZATION

I have read the information above, and I wish to receive the Hepatitis B vaccine series.

_____	_____
Employee Name	Date

Employee Signature

_____	_____
Company Representative Name	Date

Company Representative Signature

HEPATITIS B DECLINATION

(After Exposure to Blood or Body Fluids)

I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring the Hepatitis B Virus (HBV). I have been given the opportunity to be vaccinated with the Hepatitis B Vaccine, at no charge to myself. However, I decline Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Name

Date

Employee Signature

Company Representative Name

Date

Company Representative Signature

An employee who chooses not to accept the vaccine must sign the above statement of declination of hepatitis B vaccination. The statement can only be signed by the employee following appropriate training regarding hepatitis B, hepatitis B vaccination, the efficacy, safety, method of administration, and benefits of vaccination, and that the vaccine and vaccination are provided free of charge to the employee. The statement is not a waiver; employees can request and receive the hepatitis B vaccination at a later date if they remain occupationally at risk for hepatitis B.

EXHIBIT C

EXPOSURE INCIDENT REPORT

Division _____ Date _____

Location _____

Name (Employee Exposed)

Date of exposure

Location of exposure

Circumstances under which exposure incident occurred.

—

—

Name (Person Treated):

Sent to medical Facility? Yes No HOW?

Name of Medical Facility:

Witnesses:

HEARING CONSERVATION POLICY

HEARING CONSERVATION PROGRAM

PURPOSE: To identify exposure limits and establish consistent administrative procedures to protect workers from hearing loss.

POLICY: To protect workers from hearing loss, the plant is required to maintain an effective hearing conservation program. Local or national regulations, whichever are more stringent, shall take precedence.

A. Application:

The program applies to all areas where:

1. Employee exposure measurements indicate levels at or above OSHA's Action Level (85 dBA).
2. Difficulties exist in understanding normal conversation in the workplace when the speaker and the listener face each other at a distance of two feet.

B. Exposure Criteria:

Eighty-five decibel time-weighted average (TWA) or 50% or above the TWA dose based on an eight hour exposure - hearing plan must be implemented; hearing protection must be available and worn.

RESPONSIBILITY:

- A. The Plant Manager is responsible for the effectiveness of the hearing conservation plan and the institution of engineering and administrative controls where applicable.
- B. All Supervisors are responsible for ensuring the directives contained in this guide are completely carried out by affected employees.
- C. Employees issued equipment to protect themselves from on-the-job hazards are directly responsible for following, operating, and maintenance procedures.

PROCEDURES:

- A. **Initial Determination:** At least every two years, or within sixty days of the change of production, process, equipment, controls, initial determination of noise levels in the workplace must be conducted. This study should determine if any employee's exposure may be equal to or exceed an eight-hour time weighted average of 85 db measured on the "A Scale". All such determinations must be recorded.
- B. **Monitoring:** If an initial determination indicates an exposure greater than or equal to OSHA's Action Level (85 dBA), individual or representative exposure measurements must be made within sixty days for all employees who may be exposed at or above that level.

If a group of employees are engaged in a similar kind of work with the same noise exposure, a measurement can be made for the person believed to have the greatest exposure and then attribute that exposure to all employees in that group.

1. Frequency

- a. Monitoring shall be repeated every two years unless an initial determination indicates that employee exposure is less than 85 db.
- b. Within sixty days of a change in production, processes, equipment, controls, or personnel, which may result in inadequate protection provided by hearing protectors.

C. Notification:

1. Within twenty-one days of monitoring, each employee whose exposure is greater than or equal to OSHA's Action Level (85 dBA) must be notified in writing of the results. A letter from the Plant Manager may be posted in lieu of individual notification. A sign-off sheet for the employees indication that they have read the announcement, also, should be provided and retained for file.
2. Within sixty days of employment, new employees shall be notified of the measured exposure, if it is greater than or equal to OSHA's Action Level (85 dBA).

D. Observation of Monitoring: Any employee shall be provided the opportunity to go observe monitoring and receive an explanation of the procedures.

E. Hearing Protection:

1. Criteria - If the eight-hour time weighted average is greater than or equal to 85 dB, hearing protection shall be provided and used on a voluntary basis. Where monitoring levels are shown to be greater than OSHA's Permissible Limit (90 dBA), hearing protection shall be provided and its use shall be mandatory.
2. Availability - Employees shall be given the opportunity to select their hearing protectors from a variety of suitable ones provided by the company.
3. Recommended Hearing Protectors - Hearing protectors must reduce noise levels to below 85 dB time weighted average.

F. Engineering Controls: An engineering survey will be required for areas above 85 dB "A Scale" to determine the feasibility of noise reduction. Where practical, engineering controls should be instituted.

G. Training: For employees who are exposed to levels greater than or equal to 85 dB, annual training is necessary. Training shall include the following materials:

1. Contents of the company's Hearing Conservation Program.
2. The effects of noise on hearing.
3. Machinery that produces high hazardous noise levels.
4. The role of engineering and administrative controls in the reduction of noise exposure.
5. Purpose and proper use of hearing protectors.
6. Purpose and audiometric exams and explanation of test procedures.
7. Care and use of hearing protectors.

- H. Access and Training of Information: Employees may review their medical records covering noise exposures at any time. Any other release of this information must be coordinated through the Human Resources department.
- I. Signs: Warning signs are required at the entrances to areas where exposures are greater than or equal to 85 dB (TWA) and in areas where hearing protection is required. The sign should state "Warning! High Noise Area", "Hearing Protection Required", or similar verbiage.
- J. Records: Medical records must be retained confidentially in the employee's medical file for thirty years. Workplace noise monitoring reports must be maintained for at least two years.

RESPIRATORY PROTECTION PROGRAM

RESPIRATORY PROTECTION PROGRAM

Purpose

ABC Company has determined that employees in the *Prep, Coating, Assembly, and Maintenance Departments* are exposed to respiratory hazards during routine operations. These hazards include *wood dust, particulates, and vapors, and in some cases represent Immediately Dangerous to Life or Health (IDLH) conditions.* The purpose of this program is to ensure that all employees are protected from exposure to these respiratory hazards.

Engineering controls, such as ventilation and substitution of less toxic materials, are the first lines of defense; however, engineering controls have not always been feasible for some of our operations, or have not always completely controlled the identified hazards. In these situations, respirators and other protective equipment must be used. Respirators are also needed to protect employees' health during emergencies. The work processes requiring respirator use are outlined in Table 1 in the Scope and Application section of this program.

In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection. As a general policy we will review each of these requests on a case-by-case basis. If the voluntary use of respiratory protection will not jeopardize the health or safety of the worker(s), we will provide respirators for voluntary use. As outlined in the Scope and Application section of this program, voluntary respirator use is subject to certain requirements of this program.

Scope and Application

This program applies to all employees who are required to wear respirators during normal work operations, and during some non-routine or emergency operations such as a spill of a hazardous substance. This includes employees in *the Prep, Coating (Spray Booth), Assembly, and Maintenance departments.* All employees working in these areas and engaged in certain processes or tasks (as outlined in the table below) must be enrolled in the company's respiratory protection program.

In addition, any employee who voluntarily wears a respirator when a respirator is not required (*i.e., in certain maintenance and coating operations*) is subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and must be provided with certain information specified in this section of the program..

Employees who voluntarily wear filtering facepieces (dust masks) are not subject to the medical evaluation, cleaning, storage, and maintenance provisions of this program. Employees participating in the respiratory protection program do so at no cost to them. The expense associated with training, medical evaluations and respiratory protection equipment will be borne by the company.

The following respirators are used in the departments listed below:

TABLE 1: VOLUNTARY AND REQUIRED RESPIRATOR USE

Respirator	Department/Process
<i>Air Purifying Respirator (APR) with P100 filters</i>	<i>Prep Sanding/Finishing</i>

Responsibilities

Program Administrator:

The Program Administrator is responsible for administering the respiratory protection program.

Duties of the program administrator include:

- Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- Selection of respiratory protection options.
- Monitoring respirator use to ensure that respirators are used in accordance with their certifications.
- Arranging for and/or conducting training.
- Ensuring proper storage and maintenance of respiratory protection equipment.
- Conducting qualitative fit testing with *Bitrex*.
- Administering the medical surveillance program.
- Maintaining records required by the program.
- Evaluating the program.
- Updating written program, as needed.

The Program Administrator is _____.

Supervisors:

Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas. In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the employees under their charge. Duties of the supervisor include:

- Ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and medical evaluation.
- Ensuring the availability of appropriate respirators and accessories.
- Being aware of tasks requiring the use of respiratory protection.
- Enforcing the proper use of respiratory protection when necessary.
- Ensuring that respirators are properly cleaned, maintained, and stored according to the respiratory protection plan.
- Ensuring that respirators fit well and do not cause discomfort.
- Continually monitoring work areas and operations to identify respiratory hazards.
- Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.

Employees:

Each employee has the responsibility to wear his or her respirator when and where required and in the manner in which they were trained. Employees must also:

- Care for and maintain their respirators as instructed, and store them in a clean sanitary location.
- Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly.
- Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.

Program Elements

Selection Procedures:

The Program Administrator will select respirators to be used on site, based on the hazards to which workers are exposed and in accordance with all OSHA standards. The Program Administrator will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency. The hazard evaluation will include:

- 1) Identification and development of a list of hazardous substances used in the workplace, by department, or work process.
- 2) Review of work processes to determine where potential exposures to these hazardous substances may occur. This review shall be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
- 3) Exposure monitoring to quantify potential hazardous exposures. *Monitoring will be contracted out. ABC Company currently has a contract with ABC Industrial Hygiene services to provide monitoring when needed.*

NIOSH Certification

All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. Also, all filters, cartridges, and canisters must be labeled with the appropriate NIOSH approval label. The label must not be removed or defaced while it is in use.

Voluntary Respirator Use

We will provide respirators at no charge to employees for voluntary use for the following work processes:

- *Employees may wear half-face piece air purifying respirators (APRs) with organic vapor cartridges while working in the dip coat area.*
- *Warehouse workers may wear filtering face pieces.*
- *Spray Booth Operators may wear half-face piece APRs with organic vapor cartridges while cleaning spray guns.*
- *Maintenance personnel may wear half-face piece APRs with P100 cartridges while cleaning spray booth walls, and organic vapor cartridges while loading spray guns.*

The Program Administrator will provide all employees who voluntarily choose to wear either of the above respirators with a copy of Appendix D of the standard. (Appendix D details the requirements for voluntary use of respirators by employees.) Employees choosing to wear a half face piece APR must comply with the procedures for Medical Evaluation, Respirator Use, and Cleaning, Maintenance and Storage.

The Program Administrator shall authorize voluntary use of respiratory protective equipment as

requested by all other workers on a case-by-case basis, depending on specific workplace conditions and the results of the medical evaluations.

Hazard Assessment

The results of the current hazard evaluation are the following:

Prep-sanding: *Ventilation controls on some sanders are in place, but employees continue to be exposed to respirable wood dust at 2.5 - 7.0 mg/m³ (8 hour time-weighted-average, or TWA). Half-face piece APRs with P100 filters and goggles are required for employees sanding wood pieces. powered air purifying respirators (PAPRs) will be available for employees who are unable to wear an APR.*

Prep-cleaning: *Average methylene chloride exposures measured at 70 ppm based on 8 hr. TWA exposure results for workers cleaning/stripping furniture pieces. Ventilation controls are planned, but will not be implemented until designs are completed and a contract has been let for installation of the controls. In the meantime, employees must wear supplied air hoods with continuous air flow, as required by the Methylene Chloride standard 1910.1052.*

Coating-spray booth: *ABC Company has decided to take a conservative approach and require all employees to wear supplied air respirators when working inside the spray booth. Based on exposure data in published reports on the same type of spray booth operations, the Program Administrator has determined that an supplied air respirator (SAR) in the continuous flow mode will provide sufficient protection. Spray booth employees may opt to wear half-facepiece APRs with organic vapor cartridges when cleaning spray guns.*

Maintenance: *Because of potential immediately dangerous to life or health (IDLH) conditions, employees cleaning dip coat tanks must wear a pressure demand SAR during the performance of this task. Employees may voluntarily wear half-facepiece APRs with P100 cartridges when cleaning spray booth walls or changing booth filters and half-facepiece APRs with organic vapor cartridges when loading coating agents into supply systems. Although exposure monitoring has shown that exposures are kept within PELs during these procedures, ABC Company will provide respirators to workers who are concerned about potential exposures.*

(Table 2 contains the hazard assessment data that this section was based on.)

The Program Administrator must revise and update the hazard assessment as needed (i.e., any time work process changes may potentially affect exposure). If an employee feels that respiratory protection is needed during a particular activity, he/she is to contact his or her supervisor or the Program Administrator. The Program Administrator will evaluate the potential hazard, arranging for outside assistance as necessary. The Program Administrator will then communicate the results of that assessment back to the employees. If it is determined that respiratory protection is necessary, all other elements of this program will be in effect for those tasks and this program will be updated accordingly.

Table 2 - Worksite specific hazard assessment*(copy and complete for each department/process)*

Job Description		Date
Location		Reassessment date
Supervisor	Routine	Escape

Contaminants				
Concentration				
PEL/TLV				
Hazard Ratio (HR)				
Solid/Gas/vapor				
Gas/vapor cartridge change schedule				
IDLH or O2 Deficient				
Eye Irritant				
Skin Irritant				
Respirator Selected				

Medical Evaluation

Employees who are either required to wear respirators, or who choose to wear an APR voluntarily, must pass a medical exam before being permitted to wear a respirator on the job. Employees are not permitted to wear respirators until a physician has determined that they are medically able to do so. Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

A licensed physician at *XYZ medical clinic*, where all company medical services are provided, will provide the medical evaluations. Medical evaluation procedures are as follows:

- The medical evaluation will be conducted using the questionnaire provided in Appendix C of the respiratory protection standard. The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- To the extent feasible, the company will assist employees who are unable to read the questionnaire (by providing help in reading the questionnaire). When this is not possible, the employee will be sent directly to the physician for medical evaluation.
- All affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the company physician. Employees will be permitted to fill out the questionnaire on company time.
- Follow-up medical exams will be granted to employees as required by the standard, and/or as deemed necessary by the physician.
- All employees will be granted the opportunity to speak with the physician about their medical evaluation, if they so request.
- The Program Administrator has provided the physician with a copy of this program, a copy of the Respiratory Protection standard, the list of hazardous substances by work area, and for each employee requiring evaluation: his or her work area or job title, proposed respirator type and weight, length of time required to wear respirator, expected physical work load (light, moderate, or heavy), potential temperature and humidity extremes, and any additional protective clothing required.
- Any employee required for medical reasons to wear a positive pressure air purifying respirator will be provided with a powered air purifying respirator.
- After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided under the following circumstances:
 1. Employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
 2. The physician or supervisor informs the Program Administrator that the employee needs to be reevaluated;
 3. Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation;
 4. A change occurs in workplace conditions that may result in an increased physiological burden on the employee.
- A list of employees currently included in medical surveillance is provided in Table 2 of this program. All examinations and questionnaires are to remain confidential between the employee and the physician.

Fit Testing

Fit testing is required for employees wearing *half-facepiece APRs for exposure to wood dust in Prep and Assembly, and maintenance workers who wear a tight-fitting SAR for dip tank cleaning. Employees voluntarily wearing half-facepiece APRs may also be fit tested upon request.*

Employees who are required to wear *half-facepiece APRs* will be fit tested:

- Prior to being allowed to wear any respirator with a tight fitting facepiece.
- Annually.
- When there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).
-

Employees will be fit tested with the make, model, and size of respirator that they will actually wear. Employees will be provided with several models and sizes of respirators so that they may find an optimal fit. Fit testing of PAPRs is to be conducted in the negative pressure mode. The Program Administrator will conduct fit tests following the OSHA *approved Bitrex Solution Aerosol qualitative fit testing (QLFT) Protocol* in Appendix B (B4) of the Respiratory Protection standard. *The Program Administrator has determined that quantitative fit testing (QNFT) is not required for the respirators used under current conditions.* If conditions affecting respirator use change, the Program Administrator will evaluate on a case-by-case basis whether QNFT is required.

Respirator Use

General Use Procedures:

- Employees will use their respirators under conditions specified by this program, and in accordance with the training they receive on the use of each particular model. In addition, the respirator shall not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- All employees shall conduct user seal checks each time that they wear their respirator. Employees shall use either the positive or negative pressure check (depending on which test works best for them) specified in Appendix B-1 of the Respiratory Protection Standard.
- All employees shall be permitted to leave the work area to go to the locker room to maintain their respirator for the following reasons: to clean their respirator if the respirator is impeding their ability to work, change filters or cartridges, replace parts, or to inspect respirator if it stops functioning as intended. Employees should notify their supervisor before leaving the area.
- Employees are not permitted to wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal. Employees are not permitted to wear headphones, jewelry, or other articles that may interfere with the facepiece-to-face seal.

Emergency Procedures:

The following work areas have been identified as having foreseeable emergencies:

- *Spray Booth Cleaning Area - spill of hazardous waste*
- *Dip Coat Area - malfunction of ventilation system, leak in supply system*
- *Coatings Storage Area - spill or leak of hazardous substances*

When the alarm sounds, employees in the affected department must immediately don their emergency escape respirator, shut down their process equipment, and exit the work area. All other employees must immediately evacuate the building. *ABC Company's Emergency Action Plan* describes these procedures (including proper evacuation routes and rally points) in greater detail. Emergency escape respirators are located:

- *Locker #1 in the Spray Booth Area*
- *Storage cabinet #3 in Dip Coat/Drying Area*
- *Locker #4 in the Coatings Storage Area*
-

Respiratory protection in these instances is for escape purposes only. Employees are not trained as emergency responders, and are not authorized to act in such a manner.

Respirator Malfunction

APR Respirator Malfunction:

For any malfunction of an APR (e.g., such as breakthrough, facepiece leakage, or improperly working valve), the respirator wearer should inform his or her supervisor that the respirator no longer functions as intended, and go to the designated safe area to maintain the respirator. The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.

All workers wearing atmosphere-supplying respirators will work with a buddy. Buddies shall assist workers who experience an SAR malfunction as follows:

If a worker in the spray booth experiences a malfunction of an SAR, he or she should signal to the buddy that he or she has had a respirator malfunction. The buddy shall don an emergency escape respirator and aid the worker in immediately exiting the spray booth.

Workers cleaning wood pieces or assembled furniture in the Prep department will work with a buddy.

If one of the workers experiences a respirator malfunction, he/she shall signal this to their buddy.

The buddy must immediately stop what he or she is doing to escort the employee to the Prep staging area where the employee can safely remove the SAR.

Immediately Dangerous to Life or Health (IDLH) Procedures

The Program Administrator has identified the following area as presenting the potential for IDLH conditions:

Dip Coat Tank Cleaning:

Maintenance workers will be periodically required to enter the dip tank to perform scheduled or unscheduled maintenance. In such cases, workers will follow the permit required confined space entry procedures specified in the Confined Space Program. As specified in these procedures, the Program Administrator has determined that workers entering this area shall wear a pressure demand SAR. In addition, an appropriately trained and equipped standby person shall remain outside the dip tank and maintain constant voice and visual communication with the worker. In the event of an emergency requiring the standby person to enter the IDLH environment, the standby person shall immediately notify the Program Administrator and will proceed with rescue operations in accordance with rescue procedures outlined in the Confined Space Program.

Air Quality

For supplied-air respirators, only Grade D breathing air shall be used in the cylinders. The Program Administrator will coordinate deliveries of compressed air with the company's vendor, *Compressed Air Inc.*, and require *Compressed Air Inc.* to certify that the air in the cylinders meets the specifications of Grade D breathing air.

The Program Administrator will maintain a minimum air supply of one fully charged replacement cylinder for each SAR unit. In addition, cylinders may be recharged as necessary from the breathing air cascade system located near the respirator storage area. The air for this system is provided by our supplier, and deliveries of new air are coordinated by the Program Administrator.

Cleaning, Maintenance, Change Schedules and Storage

Cleaning

Respirators are to be regularly cleaned and disinfected at the designated respirator cleaning station *located in the employee locker room.*

Respirators issued for the exclusive use of an employee shall be cleaned as often as necessary, but at least once a day for *workers in the Prep and Assembly departments.*

Atmosphere supplying and emergency use respirators are to be cleaned and disinfected after each use.

The following procedure is to be used when cleaning and disinfecting respirators:

- Disassemble respirator, removing any filters, canisters, or cartridges.
- Wash the facepiece and associated parts in a mild detergent with warm water. Do not use organic solvents.
- Rinse completely in clean warm water.
- Wipe the respirator with disinfectant wipes (70% Isopropyl Alcohol) to kill germs.
- Air dry in a clean area.
- Reassemble the respirator and replace any defective parts.
- Place in a clean, dry plastic bag or other air tight container.

Note: The Program Administrator will ensure an adequate supply of appropriate cleaning and disinfection material at the cleaning station. If supplies are low, employees should contact their supervisor, who will inform the Program Administrator.

Maintenance

Respirators are to be properly maintained at all times in order to ensure that they function properly and adequately protect the employee. Maintenance involves a thorough visual inspection for cleanliness and defects. Worn or deteriorated parts will be replaced prior to use.

No components will be replaced or repairs made beyond those recommended by the manufacturer. Repairs to regulators or alarms of atmosphere-supplying respirators will be conducted by the manufacturer.

The following checklist will be used when inspecting respirators:

- Facepiece:
 - cracks, tears, or holes
 - facemask distortion
 - cracked or loose lenses/faceshield
- Headstraps:
 - breaks or tears
 - broken buckles
- Valves:
 - residue or dirt
 - cracks or tears in valve material
- Filters/Cartridges:
 - approval designation
 - gaskets
 - cracks or dents in housing
 - proper cartridge for hazard
- Air Supply Systems:
 - breathing air quality/grade
 - condition of supply hoses
 - hose connections
 - settings on regulators and valves

Employees are permitted to leave their work area to perform limited maintenance on their respirator in a designated area that is free of respiratory hazards. Situations when this is permitted include to wash their face and respirator facepiece to prevent any eye or skin irritation, to replace the filter, cartridge or canister, and if they detect vapor or gas breakthrough or leakage in the facepiece or if they detect any other damage to the respirator or its components.

Change Schedules

Employees wearing APRs or PAPRs with P100 filters for protection against wood dust and other particulates shall change the cartridges on their respirators when they first begin to experience difficulty breathing (i.e., resistance) while wearing their masks.

Based on discussions with our respirator distributor about workplace exposure conditions, employees voluntarily wearing APRs with organic vapor cartridges shall change the cartridges on their respirators at the end of each work week to ensure the continued effectiveness of the respirators.

Storage

Respirators must be stored in a clean, dry area, and in accordance with the manufacturer's recommendations. Each employee will clean and inspect their own air-purifying respirator in accordance with the provisions of this program and will store their respirator in a plastic bag in their own locker. Each employee will have his/her name on the bag and that bag will only be used to store that employee's respirator.

Atmosphere supplying respirators will be stored in *the storage cabinet outside of the Program Administrator's office.*

The Program Administrator will store the supply of respirators and respirator components in their original manufacturer's packaging in the equipment storage room.

Defective Respirators

Respirators that are defective or have defective parts shall be taken out of service immediately. If, during an inspection, an employee discovers a defect in a respirator, he/she is to bring the defect to the attention of his or her supervisor. Supervisors will give all defective respirators to the Program Administrator. The Program Administrator will decide whether to:

- Temporarily take the respirator out of service until it can be repaired.
- Perform a simple fix on the spot such as replacing a headstrap.
- Dispose of the respirator due to an irreparable problem or defect.

When a respirator is taken out of service for an extended period of time, the respirator will be tagged out of service, and the employee will be given a replacement of similar make, model, and size. All tagged out respirators will be kept in the storage cabinet inside the Program Administrator's office.

Training

The Program Administrator will provide training to respirator users and their supervisors on the contents of the Respiratory Protection Program and their responsibilities under it, and on the OSHA Respiratory Protection standard. Workers will be trained prior to using a respirator in the workplace. Supervisors will also be trained prior to using a respirator in the workplace or prior to supervising employees that must wear respirators.

The training course will cover the following topics:

1. the Respiratory Protection Program
2. the OSHA Respiratory Protection standard
3. respiratory hazards encountered and their health effects
4. proper selection and use of respirators
5. limitations of respirators
6. respirator donning and user seal (fit) checks
7. fit testing
8. emergency use procedures
9. maintenance and storage
10. medical signs and symptoms limiting the effective use of respirators

Employees will be retrained at least annually or more often if needed (e.g., if they change departments and need to use a different respirator). Employees must demonstrate their understanding of the topics covered in the training through hands-on exercises and a written test. Respirator training will be documented by the Program Administrator and the documentation will include the type, model, and size of respirator for which each employee has been trained and fit tested.

Program Evaluation

The Program Administrator will conduct periodic evaluations of the workplace to ensure that the provisions of this program are being implemented. The evaluations will include regular consultations with employees who use respirators and their supervisors, site inspections, air monitoring and a review of records.

Problems identified will be noted in an inspection log and addressed by the Program Administrator. These findings will be reported to management, and the report will list plans to correct deficiencies in the respirator program and target dates for the implementation of those corrections.

The following questionnaire can be used for the purpose of monitoring the effectiveness of the program.

Program Self Evaluation

Date:

Location:

Are there adequate written respirator use procedures and are they followed?

Is there adequate data to support hazard assessment and gas/vapor cartridge change schedules?

Are employees wearing proper respiratory protection?

Have employees been trained on respirator use and can they demonstrate knowledge?

Have employees been trained on hazard exposure and can they demonstrate knowledge?

Are there records of employee fit tests, training, and medical records?

Is there a schedule and records for inspection, cleaning and maintenance of respirators?

Are employee medical evaluations on file?

Notes:

CONFINED SPACE ENTRY

CONFINED SPACE ENTRY PROGRAM

A. INTRODUCTION

Many workplaces contain spaces that are considered to be "confined" because their configurations hinder the activities of any employees who must enter into, work in, and exit from them. In many instances, employees who work in confined spaces also face increased risk of exposure to serious physical injury from hazards such as entrapment, engulfment, and hazardous atmospheric conditions. Confinement itself may pose entrapment hazards, and work in confined spaces may keep employees closer to hazards, such as asphyxiating atmosphere, than they would be otherwise. For example, confinement, limited access, and restricted airflow can result in hazardous conditions that would not arise in an open workplace.

The term "permit-required confined space" (i.e., permit space) refers to those spaces that meet the definition of a "confined space" and pose health or safety hazards, thereby requiring a permit for entry.

REFERENCE: CRF1910.146

Support Documentation

- Exhibit A—Confined Space Inventory (Non-Mandatory)
- Exhibit B—Authorized Entrants to PRCS (Non-Mandatory)
- Exhibit C—Confined Space Pre-Entry Permit (Mandatory)
- Exhibit D—Confined Space Entry Permit (Mandatory)

CONFINED SPACE

- limited or restricted means of entry or exit
- large enough to enter and perform work
- not designed for continuous occupancy
- includes vaults, tanks, pits, diked areas, crawlspaces and small enclosed rooms or areas

PERMIT-REQUIRED CONFINED SPACE

- contains or has the potential to contain a hazardous atmosphere
- contains a material that has the potential for engulfing an entrant
- internal configuration might cause entrant to be trapped
- contains other recognized serious safety or health hazards

B. REQUIREMENTS OF THE STANDARD

General

- Employer must evaluate the workplace to determine if spaces are permit-required
- If permit space, employees must be informed as to the existence, location and danger posed by the spaces
- Warning sign posted:

DANGER–PERMIT REQUIRED CONFINED SPACE
Authorized Entrants Only

- If employees must enter permit spaces, a written permit space program must be developed
- If employer can demonstrate with monitoring and inspection data that the only hazard is an actual or potential hazardous atmosphere, which can be made safe for entry by the use of continuous forced ventilation alone, they may be exempted from some requirements, such as permits.
- Internal atmosphere of the space must always be tested first for oxygen content, second for flammable gases and vapors, and third for potential air contaminants before any employee enters.

C. WRITTEN PROGRAM

The employer who allows employee entry must develop and implement a written program for permit-required confined spaces.

Among other things, the OSHA standard requires the employer's program to:

- identify and evaluate permit space hazards before entry;
- test conditions in the permit space before entry operations and monitor the space during entry;
- perform, in the following sequence, appropriate testing for atmospheric hazards: oxygen, combustible gases or vapors, and toxic gases or vapors;
- implement necessary measures to prevent unauthorized entry;
- establish and implement the means, procedures and practices, such as specifying acceptable entry conditions, isolating the permit space, providing barriers, verifying acceptable entry conditions, purging, making inert, flushing, or ventilating the permit space to eliminate or control hazards necessary for safe permit space entry operations;
- identify employee job duties;
- provide, maintain, and require, at no cost to the employee, the use of personal protective equipment and any other equipment necessary for safe entry (e.g., testing, monitoring, ventilating, communications, and lighting equipment; barriers, shields and ladders);
- ensure that at least one attendant is stationed outside the permit space for the duration of entry operations;
- coordinate entry operations when employees of more than one employer are to be working in the permit space;
- implement appropriate procedures for summoning rescue and emergency services;
- establish, in writing, and implement a system for the preparation, issuance, use, and cancellation of entry permits;
- when an attendant is required to monitor multiple spaces, implement the procedures to be followed during an emergency in one or more of the permit spaces being monitored.

If hazardous conditions are detected during entry, employees must immediately leave the space, and

the employer must evaluate the space to determine the cause of the hazardous atmospheres.

D. PERMIT SYSTEM

A permit, signed by the entry supervisor and verifying that pre-entry preparations have been completed and that the space is safe to enter, must be posted at entrances or otherwise made available to entrants before they enter a permit space.

The duration of entry permits must not exceed the time required to complete an assignment. Also, the entry supervisor must terminate entry and cancel permits when an assignment has been completed or when new conditions exist. New conditions must be noted on the canceled permit and used in revising the permit space program. The standard also requires the employer to keep all canceled entry permits for at least 1 year.

E. ENTRY PERMITS

Entry permits must include the following information:

- test results;
- tester's initials or signature;
- name and signature of supervisor who authorizes entry;
- name of permit space to be entered, authorized entrant(s), eligible attendants, and individual(s) authorized to be entry supervisors;
- purpose of entry and known space hazards;
- measures, to be taken, to isolate permit spaces and to eliminate or control space hazards, i.e., locking out or tagging of equipment and procedures for purging, making inert, ventilating, and flushing permit spaces;
- name and telephone numbers of rescue and emergency services;
- date and authorized duration of entry;
- acceptable entry conditions;
- communication procedures and equipment to maintain contact during entry;
- additional permit(s), such as for hot work, that have been issued to authorize work in the permit space;
- special equipment and procedures, including personal protective equipment and alarm systems; and
- any other information needed to ensure employee safety.

F. TRAINING AND EDUCATION

Before initial work assignment begins, the employer must provide proper training for all workers who are required to work in permit spaces. Upon completing this training, employers must ensure that employees have acquired the understanding, knowledge, and skills necessary for the safe performance of their duties. Additional training is required when (1) the job duties change, (2) there is a change in the permit space program or the permit space operation presents a new hazard, and (3) when an employee's job performance shows deficiencies. Training also is required for rescue team members, including cardiopulmonary resuscitation (CPR) and first-aid training (see Emergencies). Employers must certify that training has been accomplished.

Upon completion of training, employees must receive a certificate of training that includes the employee's name, signature or initials of trainer(s), and dates of training. Employees and their authorized representatives must make the certification available for inspection.

G. AUTHORIZED ENTRANT'S DUTIES

- know space hazards, including information on the mode of exposure (e.g., inhalation or dermal absorption), signs or symptoms, and consequences of the exposure;
- use appropriate personal protective equipment properly (e.g., face and eye protection, and other forms of barrier protection such as gloves, aprons and coveralls);
- as necessary, maintain communication (i.e., telephone, radio, visual observation) with attendants to enable the attendant to monitor the entrant's status as well as to alert the entrant to evacuate;
- exit from permit space as soon as possible when ordered by an authorized person, when the entrant recognizes the warning signs or symptoms of exposure exist, when a prohibited condition exists, or when an automatic alarm is activated; and
- alert the attendant when a prohibited condition exists or when warning signs or symptoms of exposure exist.

H. ATTENDANT'S DUTIES

- remain outside permit space during entry operations unless relieved by another authorized attendant;
- perform non-entry rescues when specified by employer's rescue procedure;
- know existing and potential hazards, including information on the mode of exposure, signs or symptoms, consequences of the exposure, and their physiological effects;
- maintain communication with and keep an accurate account of those workers entering the permit-required space;
- order evaluation of the permit space when a prohibited condition exists, when a worker shows signs of physiological effects of hazard exposure, when an emergency outside the confined space exists, and when the attendant cannot effectively and safely perform required duties;
- summon rescue and other services during an emergency;
- ensure that unauthorized persons stay away from permit spaces or exit immediately if they have entered the permit space;
- inform authorized entrants and entry supervisor of entry by unauthorized persons; and
- perform no other duties that interfere with the attendant's primary duties.

I. ENTRY SUPERVISOR'S DUTIES

- know space hazards including information on the mode of exposure, signs, or symptoms and consequences of exposure;
- verify emergency plans and specified entry conditions such as permits, tests, procedures, and equipment before allowing entry;
- terminate entry and cancel permits when entry operations are completed or if a new condition exists;
- take appropriate measures to remove unauthorized entrants; and
- ensure that entry operations remain consistent with the entry permit and that acceptable entry conditions are maintained.

J. EMERGENCIES

The standard requires the employer to ensure that rescue service personnel are provided with and trained in the proper use of personal protective and rescue equipment, including respirators; trained to perform assigned rescue duties; and have had authorized entrants training. The standard also requires that all rescuers be trained in first aid and CPR and, at a minimum, one rescue team member be currently certified in first aid and in CPR. The employer must also ensure that practice rescue

exercises are performed yearly, and that rescue services are provided access to permit spaces so that they can practice rescue operations. Rescuers must also be informed of the hazards of the permit space.

Also, when appropriate, authorized entrants who enter a permit space must wear a chest or full body harness with a retrieval line attached to the center of their backs near shoulder level, or above their heads. Wristlets may be used if the employer can demonstrate that the use of a chest or full body harness is infeasible or creates a greater hazard. Also, the employer must ensure that the other end of the retrieval line is attached to a mechanical device or to a fixed point outside the permit space. A mechanical device must be available to retrieve personnel from vertical type permit spaces more than 5 feet deep.

In addition, if an injured entrant is exposed to a substance for which a Material Safety Data Sheet (MSDS) or other similar written information is required to be kept at the worksite, that MSDS or other written information must be made available to the medical facility treating the exposed entrant.

NOTE: See the following Permit Required Confined Space Respirator Program.

