

# Safety Program Requirements

# Safety Program Requirements

Asseff Enterprises LLC

Title	Program Requirements	Training Requirements
Access to Employee Exposure and Medical Records	<ul style="list-style-type: none"> <li>• Identify what records must be maintained</li> <li>• Maintain employee's records confidentially</li> <li>• Ensure access to records by employees, as required</li> <li>• Inform employees of their rights, complete <b>pg. 6</b> (file name: Access to Employee Exposure and Medical Records FORM), employees need access</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Access to Employee Exposure and Medical Records</li> </ul> <p>Employees must be informed of what records are kept, their location, and how to access them.</p> <p>Frequency: initial, annual</p>
Accident Investigation and Reporting	<ul style="list-style-type: none"> <li>• Determine who will investigate accidents, this may include supervisors, management, and employees</li> <li>• Determine accident and near miss reporting procedures</li> <li>• Inform employees of the work-related injuries and illness procedures and their rights to report</li> <li>• Complete accident report as needed, <b>pg. 11– 13</b> (file name: Accident, Incident, Near Miss Investigation Report FORM)</li> <li>• Note additional state requirements for: AK, HI, WA</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Accident investigation (Supervisor)</li> <li>• Accident Reporting</li> </ul>
Back Safety in the Workplace	<ul style="list-style-type: none"> <li>• Identify risk factors for back injury in the operations               <ul style="list-style-type: none"> <li>• Repetitive or prolonged activities</li> <li>• Awkward postures</li> <li>• Unusual size or weight objects</li> </ul> </li> <li>• Implement any required controls to minimize or eliminate hazards</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Back Safety</li> <li>• Back Care (Medical)</li> </ul>
Blood and Body Fluids (Incidental) Exposure	<ul style="list-style-type: none"> <li>• Identify risk situations</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Blood and Body Fluids Safety Awareness</li> </ul>
Electrical (Comprehensive) >50V	<ul style="list-style-type: none"> <li>• Review hazards and determine level of exposures</li> <li>• Provide testing supplies and safety equipment</li> <li>• Provide warning and alerting devices to protect employees from contact with energy hazards</li> <li>• Write and communicate policies and procedures, <b>pg. 10 – 12</b> (file name: Electrical Safety Written Program (Example) FORM), employees need access</li> <li>• Note additional state requirements for: AK, MI, MN, OR</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Electrical Safety</li> </ul> <p>Hazard recognition and protective measures. Competent person for Ground Fault Protection in Construction. (Paychex can provide general awareness training, not qualification or high voltage exposure)</p> <p>Frequency: initial, update as required</p>

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Emergency Action, Evacuation and Fire Prevention	<ul style="list-style-type: none"> <li>• Identify and evaluate fire hazards</li> <li>• Identify and evaluate exit routes</li> <li>• Provide emergency equipment as needed</li> <li>• Write and communicate policies and procedures including Emergency Action and Fire Prevention Programs, <b>pg. 12 - 13</b> (file name: Emergency Action Plan FORM), employees need access</li> <li>• Review program at least annually</li> <li>• Annual and monthly fire extinguisher inspections</li> <li>• Note additional state requirements for: MI, OR</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Emergency Action</li> <li>• Fire Extinguisher</li> </ul> <p>Emergency Action training required for all employees in exiting areas, relocation safe-spot, and (as appropriate) fire hazards.</p> <p>Fire Extinguisher training required if an employee is required to use fire extinguishers, training required annually. (Paychex can provide only voluntary use fire extinguisher training)</p> <p>Frequency: initial, update as required, annual for some businesses</p>
Ergonomics and MSD	<ul style="list-style-type: none"> <li>• Evaluate the need for an ergonomics program</li> <li>• Implement controls to minimize or eliminate repetitive or force trauma tasks</li> <li>• Note additional state requirements for: CA, ME</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Office Ergonomics</li> <li>• General Industry Ergonomics</li> </ul>
General Safety Awareness	<ul style="list-style-type: none"> <li>• Document any site specific General Safety Rules not covered by any other section of the safety manual, <b>pg. 7</b> (file name: General Safety Rules FORM), employees need access</li> <li>• Ensure New Employee are given safety training prior to starting work</li> <li>• Note additional state requirements for: HI, OR</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• General Safety Orientation</li> </ul>
Hand and Portable Power Tools	<ul style="list-style-type: none"> <li>• Inspect tools before use to ensure they are in good operating condition</li> <li>• Note additional state requirements for: MI, MN</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Hand and Portable Power Tools</li> </ul>

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Hazard Communication	<ul style="list-style-type: none"> <li>• Determine if hazardous chemicals are present in the workplace</li> <li>• Ensure a Hazardous Chemical Inventory List is maintained, <b>pg. 7</b> (file name: Chemical Inventory List FORM)</li> <li>• Ensure the availability of a Safety Data Sheet (SDS) for each hazardous chemical or mixture in the workplace, employees need access</li> <li>• Ensure proper labeling of chemical containers</li> <li>• Complete a written hazard communication program, <b>pg. 9 - 10</b> (file name: Hazard Communication Written Program FORM), employees need access</li> <li>• Develop a process to evaluate and document any new hazards or changes</li> <li>• Ensure proper Personal protective equipment is identified</li> <li>• Note additional state requirements for: AK, HI, MD, MI, MN, NC, NM, RI, TN, VT, WA, *OR for Pesticide Worker Protection</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Hazard Communication</li> </ul> <p>SDS content, Labeling requirements, Right to Know</p> <p>Frequency: initial, update as required</p>
Personal Protective Equipment	<ul style="list-style-type: none"> <li>• Conduct an annual documented personal protective equipment assessment to identify risk factors for employee exposures, <b>pg. 8</b> (file name: Certificate of Hazard Assessment FORM), employees need access</li> <li>• Provide protective equipment, as required</li> <li>• Note additional state requirements for: MI, MN, OR</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Personal Protective Equipment</li> </ul> <p>(Equipment dependent) Users of equipment in use, storage and protection limits.)</p> <p>Frequency: initial, update as required</p>
Portable Ladder Safety	<ul style="list-style-type: none"> <li>• Ensure the appropriate type of ladder is selected based on the nature of the project</li> <li>• Ensure ladder inspections are performed, <b>pg. 7</b> (file name: Ladder Safety Checklist FORM)</li> <li>• Ensure ladders are properly repaired and maintained in accordance with regulatory standards or are properly disposed of when they are found to be defective (and or are removed from service)</li> <li>• Note additional state requirements for: CA, MI, OR</li> </ul>	<p><b>REQUIRED TRAINING:</b></p> <ul style="list-style-type: none"> <li>• Ladder Safety</li> </ul> <p>Users of ladders in inspection and equipment use</p> <p>Frequency: initial, update as required</p>
Safe Driving	<ul style="list-style-type: none"> <li>• Inspect vehicles prior to operation</li> </ul>	<p>Available but not required training:</p> <ul style="list-style-type: none"> <li>• Safe Driving</li> </ul>

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Title	Program Requirements	Training Requirements
Safety Checklist	<ul style="list-style-type: none"> <li>• Routine safety inspections and audit of workplace</li> </ul>	No OSHA trainings apply
Safety Meeting and Committee Charter	<ul style="list-style-type: none"> <li>• If required, establish a safety committee</li> <li>• Meet on a regular basis (at least quarterly) to discuss safety issues or concerns appropriate to the workplace</li> <li>• Ensure notes are taken at committee meetings and actions and activities are documented. Where corrective actions are required, ensure follow up is completed., <b>pg. 9 –10</b> (file name: Safety Committee Task Sheet FORM)</li> <li>• Note additional state requirements for: NC, OR, WA</li> </ul>	Available but not required training: <ul style="list-style-type: none"> <li>• Safety Committee Members</li> </ul>
Walking and Working Surfaces	<ul style="list-style-type: none"> <li>• Ensure aisles and passageways are of the proper width and appropriately maintained</li> <li>• Ensure all wall, floor, stairways are adequately protected</li> <li>• Ensure floors are not overloaded, and that load limits are indicated</li> <li>• Enforce housekeeping rules</li> <li>• Ensure materials are properly stored and not obstructing aisles, passageways, stairways or other areas where they could cause a hazard</li> <li>• Note additional state requirements for: MI, MN, OR</li> </ul>	Available but not required training: <ul style="list-style-type: none"> <li>• Slips Trips and Falls</li> <li>• Walking and Working Surfaces</li> </ul>
Working in Extremes Temperatures	<ul style="list-style-type: none"> <li>• Monitor workplace temperatures</li> <li>• Ensure employees and supervisors are able to recognize early signs and symptoms of cold and heat intolerance</li> <li>• Provide engineering controls, work practices and protective equipment to reduce exposure levels to the lowest achievable level</li> <li>• Ensure the availability of water or other appropriate beverages to employees</li> <li>• Note additional state requirements for: CA, WA</li> </ul>	Available but not required training: <ul style="list-style-type: none"> <li>• Extreme Temperature - Cold</li> <li>• Extreme Temperature - Heat</li> </ul>



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Asseff Enterprises LLC

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Safety Manual

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# **Asseff Enterprises LLC**

## **SAFETY AND HEALTH POLICY STATEMENT**

Safety and health in our company must be a part of every operation, and is every employee's responsibility.

We maintain a safety and health program conforming to the best practices of businesses in our industry. To be successful, such a program must embody the proper attitudes toward injury and illness prevention and requires cooperation in all safety and health matters between employees at all levels. Only through a cooperative effort can an effective safety and health program be established and preserved.

The safety and health of every employee is a high priority. Management accepts responsibility for providing a safe working environment and employees are expected to take responsibility for performing work in accordance with safe standards and practices. Safety and health is only achieved through teamwork. Everyone must join together in promoting safety and health and taking every reasonable measure to assure safe working conditions in the company.







## PROGRAM OVERVIEW

# ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS

REGULATORY STANDARD: OSHA 29CFR1910.1020 and 1913.10

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## **INTRODUCTION**

Records that pertain in any way to exposures or to employee specific health information must be maintained confidentially by the company. Employees must understand what records are kept, why, and how to access these records. This would include medical exams, facility surveys for air contaminants, noise surveys, hearing exams, etc.

## **TRAINING**

Employees informed on the types of records, location, and access procedures.

## **ACTIVITIES**

- Identify what records must be maintained
- Maintain employee records confidentially
- Ensure access to records by employees, as required

## **FORMS**

- Access to Employee Exposure and Medical Records
- Release of Medical or Exposure Records Consent Form
- Recordkeeping Requirements for Exposure Records (reference)
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## ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS PROGRAM

1. **Purpose.** This document provides written guidance for specific exposure monitoring, testing results, medical surveillance, and similar documents required by OSHA regulations with regard to employee-specific information. Records that contain health related information specific to an employee or employee exposure must be maintained for specific timeframes.
2. **Scope.** Applies to any medical or exposure monitoring records, and medical surveillance monitoring records maintained by the company.

### 3. Responsibilities

#### 3.1 Area Management:

- 3.1.1 Determines what records must be maintained. (Reference Recordkeeping Requirements for Medical and Exposure Records form)
- 3.1.2 Ensures medical and exposure records are maintained confidentially.
- 3.1.3 Ensures employees have access to medical and exposure records.

#### 3.2 Employees:

- 3.2.1 Understand where records are kept, why they are required, and how to access them.

#### 3.3 Safety Representative must (as needed):

- 3.3.1 Assist in the implementation of this program.

### 4. Procedure

#### 4.1 Access Rules.

- 4.1.1 Employee access to records must be provided within 15 working days from the date of request.
  - 4.1.1.1 Except for trade secrets, employers are to disclose the specific chemical identity [chemical name and Chemical Abstract Service (CAS) number] of materials for which exposure records are requested
  - 4.1.1.2 Requests need not be in writing, unless trade secret information is involved in the request.
  - 4.1.1.3 Delays of more than 15 days must be documented in writing and the employee informed (also in writing) of the reason for the delay and include the date of release of the record.

- 4.1.1.4 Access may be to employees to whom the records pertain or to that employee's legal representative. The records of other employees are not to be considered part of this information, unless the information is part of objective data evaluations.
- 4.1.2 OSHA may access these records at any time without written consent of the employee.
- 4.1.3 Health professionals (physicians, occupational health nurses, industrial hygienists, toxicologists, and epidemiologists) who require information for non-emergency medical treatment may request access to medical records with the written consent of the patient or their legal representative.
- 4.1.4 Health professionals (physicians, occupational health nurses, industrial hygienists, toxicologists, and epidemiologists) who require information for emergency or medical treatment of an exposed employee will be granted immediate access to pertinent information about the exposure without delay.
  - 4.1.4.1 If trade secret information is part of this record, confidentiality agreements may be obtained at a future point, however, immediate information will be transmitted as it pertains to the emergency medical treatment.
- 4.1.5 Employers must inform their workers initially and at least annually of their rights to access to medical and exposure records.

## **5. Safety Information**

### **5.1 Records Retention:**

- 5.1.1 Exposure records are generally required to be maintained for 30 years.
- 5.1.2 Medical records are generally required to be maintained for the duration of employment plus 30 years.
- 5.1.3 Biological and Chemical monitoring results are generally maintained for the duration of employment plus 30 years.
- 5.1.4 First aid records and experimental toxicological research records are excluded from the 30-year retention requirements.
- 5.1.5 Safety Data Sheets and Chemical Inventory Information is generally not required to be maintained, provided the specific information on chemical name, manufacturer and date is maintained in the exposure record.
- 5.1.6 Personal medical records for short-term employees (less than one year) do not have to be retained if they are provided to the employee on termination

5.1.7 X-rays (except chest x-rays) may be microfilmed for easier storage. Chest x-rays must be maintained in their original condition.

## 5.2 Copies of Records

5.2.1 Employees are entitled to view their records at any time.

5.2.2 One copy of the record will be provided within 15 days of a written request at no charge to the employee.

5.2.2.1 X-rays may be viewed at the site or at a convenient off-site location.

## 5.3 Transfer of Records

5.3.1 Should the company cease to do business during the record retention time frame, the company will transfer all records to the successor employer.

5.3.2 Whenever an employer is ceasing to do business and there is no successor employer to receive and maintain the records subject to this standard, the employer shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business.

## 6. Training and Information

Employees must be informed of the types of records maintained by the company, who maintains these records, and the process for accessing their personal records.

## 7. Definitions.

- *Access* – The right to read, examine, and copy.
- *Exposure Record* - Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained; or Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;
- *Medical Record* – Documentation concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician, including: Questionnaires or histories, medical examination results or laboratory test results (including x-rays), medical opinions, descriptions of treatments and prescriptions, detailed first aid descriptions, and employee medical complaints. Health insurance claims and voluntary employee assistance program information (drug or alcohol counseling, and/or personal counseling programs) are not considered part of the medical record if they are maintained in a separate system, nor are voluntary employee assistance program information.

- *Objective Data Evaluations* - a type of exposure evaluation using area or personnel sampling where the data is representative of employee exposures in the work environment.
  
- *Trade Secret* – Confidential information that pertains to the chemical make up of a substance or mixture that, when disclosed, will have a negative impact on the company's business activities with regard to trademarked or similarly protected products.

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## **ACCESS TO EMPLOYEE EXPOSURE AND MEDICAL RECORDS (OSHA 1910.1020)**

Employees and their designated representative have a right of access to relevant exposure and medical records; and to provide representatives of OSHA a right of access to these records to fulfill responsibilities under the Occupational Safety and Health Act.

Employee medical records include: medical exams, facility surveys for air contaminants, noise surveys, hearing examinations, etc.

### Location of records and availability

All exposure and medical records are on file in the \_\_\_\_\_. A copy of the records is available to the employee and an employee representative. All requests must be in writing, including the employee's signature.

### Person responsible for maintaining records

The \_\_\_\_\_ is responsible for maintaining and providing access to records and to provide information on employee's rights of access of their records.

### Location and availability of Section 1910.1020

A copy of section 1910.1020 and its appendices are located on the OSHA website ([http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10027](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10027)) or are printed and posted, and available to employees in the workplace at the following location:

\_\_\_\_\_.

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**RELEASE OF MEDICAL OR EXPOSURE RECORDS CONSENT  
FORM**

I, \_\_\_\_\_, hereby authorize  
(full name of worker/patient)

\_\_\_\_\_ to release to  
(organization holding the medical records)

\_\_\_\_\_ the following records:  
(organization authorized to receive information)

\_\_\_\_\_  
\_\_\_\_\_  
(Describe the specific information desired to be released).

I give my permission for this medical information to be used for the following purpose:

\_\_\_\_\_  
\_\_\_\_\_  
but I do not give permission for any other use or re-disclosure of this information.

This release consent expires on: \_\_\_\_\_  
(date)

ONLY the above listed information is authorized to be released. No other information  
pertaining to my records is authorized for release.

\_\_\_\_\_  
Full name (printed) of Employee or Legal Representative

\_\_\_\_\_  
Signature of Employee or Legal Representative

Date of Signature: \_\_\_\_\_

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## Recordkeeping Requirements For Exposure and Medical Records

This listing outlines the requirements for recordkeeping for employee exposure and medical records for the regulations listed in the General Industry Standards			
Topic or Record Type	Regulatory Citation	Frequency of Monitoring or Records	Duration of Recordkeeping
Incident Reports	1904	As Incident Occurs	5 years
Training Records	General	As deemed by specific regulation	Until superseded unless otherwise noted
Injury and Illness Logs (300/300A)	1904	Annual	5 years
Noise Monitoring Results	1910.95	Annual	2 years
Noise and Hearing Audiograms	1910.95	Annual	Duration of employment
Process Safety for Highly Hazardous Chemicals	1910.119	As Incident Occurs	5 years
Hazardous Waste Operations and Emergency Response for exposures above PEL	1910.120	Annual or as deemed by physician	Duration of employment plus 30 years
Respirator Use Medical Evaluations	1910.134	Annual	Duration of employment plus 30 years
Respirator Use Fit Test	1910.134	Annual	Until superseded
Commercial Diving Incident and Injury Reports	1910.401-441	As Incident Occurs	Duration of employment plus 30 years
Commercial Diving Medical Records	1910.440	Annual	5 years then to OSHA
Commercial Diving Dive Records	1910.440	Per Dive	1 year
Commercial Diving Decompression Evaluation	1910.440	Per Dive	5 years then to OSHA
Commercial Diving Equipment Evaluations and Inspections	1910.440	Per Use	Until superseded
Air Contaminants Exposures above PEL	1910.1000	Annual or as deemed by physician	Duration of employment plus 30 years
Asbestos Exposure Monitoring	1910.1001	Per Job	30 years
Asbestos Employee Exposures	1910.1001	Per Employee	Duration of employment plus 30 years
Asbestos Training Records	1910.1001	Annual	Duration of employment plus 1 year

## Recordkeeping Requirements For Exposure and Medical Records

13 Carcinogens 4-nitrobiphenyl; alpha-Naphthylamine; Methyl chloromethyl ether; 3,3'-Dichlorobenzidine (& salts); bis-Chloromethyl ether; beta-Naphthylamine; Benzidine; 4-Aminodiphenyl; Ethyleneimine; beta-Propiolactone; 2-Acetylaminofluorene; 4-Dimethylaminoazobenzene; N-Nitrosodimethylamine	1910.1003 -1006	Annual	Duration of employment
Vinyl Chloride Monitoring and Medical Surveillance Reports	1910.1007	Annual	Duration of employment plus 20 years (not less than 30 years)
Inorganic Arsenic Monitoring and Medical Surveillance Reports	1910.1008	Annual	Duration of employment plus 20 years (not less than 40 years)
Lead Monitoring and Medical Surveillance Reports	1910.1025	Annual	Duration of employment plus 20 years (not less than 40 years)
Lead Exposure Medical Removal	1910.1025	As occurs	Duration of employment
Cadmium Exposure Monitoring	1910.1027	Annual	30 years
Cadmium Exposure Medical Surveillance	1910.1027	Annual	Duration of employment plus 30 years
Cadmium Exposure Training	1910.1027	Annual	1 year
Benzene Exposure Monitoring	1910.1028	Annual	30 years
Benzene Exposure Medical Surveillance	1910.1028	Annual	Duration of employment plus 30 years
Coke Oven Emission Monitoring and Medical Surveillance	1910.1029	Annual	Duration of employment plus 20 years (not less than 40 years)

## Recordkeeping Requirements For Exposure and Medical Records

Bloodborne Pathogens Training	1910.1030	Annual	3 years
Bloodborne Pathogens Exposure Incident Reports which include Hepatitis B Vaccine Status	1910.1030	As occurs	5 years (if no reported health effect) Duration of employment plus 30 years (if reported health effect)
Bloodborne Pathogens Sharps Injury Log	1910.1030	Annual	5 years
Cotton Dust Exposure Monitoring and Medical Surveillance	1910.1043	Annual	20 years
1,2-dibromo-3-chloropropane Exposure Monitoring and Medical Surveillance	1910.1044	Annual	Duration of employment plus 20 years (not less than 40 years)
Acrylonitrile Exposure Monitoring and Medical Surveillance	1910.1045	Annual	Duration of employment plus 20 years (not less than 40 years)
Ethylene Oxide (EtO) Exposure Monitoring	1910.1047	Annual	30 years
Ethylene Oxide (EtO) Medical Surveillance	1910.1047	Annual	Duration of employment plus 30 years
Formaldehyde Exposure Monitoring	1910.1048	Annual	30 years
Formaldehyde Medical Surveillance Records	1910.1048	Annual	Duration of employment plus 30 years
Methylenedianaline Exposure Monitoring	1910.1050	Annual	30 years
Methylenedianaline Medical Surveillance Records and Medical Removal Records	1910.1050	Annual	Duration of employment plus 30 years
1,3-Butadiene Exposure Monitoring Records	1910.1051	Annual	30 years
1,3-Butadiene Medical Surveillance Records	1910.1051	Annual	Duration of employment plus 30 years

## Recordkeeping Requirements For Exposure and Medical Records

Methylene Chloride Exposure Monitoring Records	1910.1052	Annual	30 years
Methylene Chloride Medical Surveillance Records	1910.1052	Annual	Duration of employment plus 30 years
Ionizing Radiation (X-ray) Programs	1910.1096	Per program	3 years after superseded date
Ionizing Radiation (X-ray) Surveys	1910.1096	Annual or as needed	3 years
Ionizing Radiation (X-ray) License Agreements; Planned Special Exposures; Individual Monitoring Results; and Waste Disposal Records	1910.1096	Per company	3 years after termination of license agreement
Ionizing Radiation (X-ray) Individual Monitoring Results and Public Individual Monitoring Results	1910.1096	Annual or as needed	3 years after termination of license agreement
Laboratory Safety Chemical Exposure Monitoring	1910.1450	As deemed by specific chemical or regulation	Duration of employment plus 30 years



- Part Title: Occupational Safety and Health Standards
  - Subpart: Z
  - Subpart Title: Toxic and Hazardous Substances
  - **Standard Number: 1910.1020**
  - Title: Access to employee exposure and medical records.
- 

#### 1910.1020(a)

"Purpose." The purpose of this section is to provide employees and their designated representatives a right of access to relevant exposure and medical records; and to provide representatives of the Assistant Secretary a right of access to these records in order to fulfill responsibilities under the Occupational Safety and Health Act. Access by employees, their representatives, and the Assistant Secretary is necessary to yield both direct and indirect improvements in the detection, treatment, and prevention of occupational disease. Each employer is responsible for assuring compliance with this section, but the activities involved in complying with the access to medical records provisions can be carried out, on behalf of the employer, by the physician or other health care personnel in charge of employee medical records. Except as expressly provided, nothing in this section is intended to affect existing legal and ethical obligations concerning the maintenance and confidentiality of employee medical information, the duty to disclose information to a patient/employee or any other aspect of the medical-care relationship, or affect existing legal obligations concerning the protection of trade secret information.

#### 1910.1020(b)

"Scope and application."

##### 1910.1020(b)(1)

This section applies to each general industry, maritime, and construction employer who makes, maintains, contracts for, or has access to employee exposure or medical records, or analyses thereof, pertaining to employees exposed to toxic substances or harmful physical agents.

##### 1910.1020(b)(2)

This section applies to all employee exposure and medical records, and analyses thereof, of such employees, whether or not the records are mandated by specific occupational safety and health standards.

##### 1910.1020(b)(3)

This section applies to all employee exposure and medical records, and analyses thereof, made or maintained in any manner, including on an in-house or contractual (e.g., fee-for-service) basis. Each employer shall assure that the preservation and access requirements of this section are complied with regardless of the manner in which records are made or maintained.

#### 1910.1020(c)

"Definitions."

##### 1910.1020(c)(1)

"Access" means the right and opportunity to examine and copy.

##### 1910.1020(c)(2)

"Analysis using exposure or medical records" means any compilation of data or any statistical study based at least in part on information collected from individual employee exposure or medical records or information collected from health insurance claims records, provided that either the analysis has been reported to the employer or no further work is currently being done by the person responsible for preparing the analysis.

1910.1020(c)(3)

"Designated representative" means any individual or organization to whom an employee gives written authorization to exercise a right of access. For the purposes of access to employee exposure records and analyses using exposure or medical records, a recognized or certified collective bargaining agent shall be treated automatically as a designated representative without regard to written employee authorization.

1910.1020(c)(4)

"Employee" means a current employee, a former employee, or an employee being assigned or transferred to work where there will be exposure to toxic substances or harmful physical agents. In the case of a deceased or legally incapacitated employee, the employee's legal representative may directly exercise all the employee's rights under this section.

1910.1020(c)(5)

"Employee exposure record" means a record containing any of the following kinds of information:

1910.1020(c)(5)(i)

Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained;

1910.1020(c)(5)(ii)

Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs;

1910.1020(c)(5)(iii)

Safety Data Sheets indicating that the material may pose a hazard to human health; or

1910.1020(c)(5)(iv)

In the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.

1910.1020(c)(6) 1910.1020(c)(6)(i)

"Employee medical record" means a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician, including:

1910.1020(c)(6)(i)(A)

Medical and employment questionnaires or histories (including job description and occupational exposures),

1910.1020(c)(6)(i)(B)

The results of medical examinations (pre-employment, pre-assignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purpose of establishing a base-line or detecting occupational illnesses and all biological monitoring not defined as an "employee exposure record"),

1910.1020(c)(6)(i)(C)

Medical opinions, diagnoses, progress notes, and recommendations,

1910.1020(c)(6)(i)(D)

First aid records,

1910.1020(c)(6)(i)(E)

Descriptions of treatments and prescriptions, and

1910.1020(c)(6)(i)(F)

Employee medical complaints.

1910.1020(c)(6)(ii)

"Employee medical record" does not include medical information in the form of:

1910.1020(c)(6)(ii)(A)

Physical specimens (e.g., blood or urine samples) which are routinely discarded as a part of normal medical practice, or

1910.1020(c)(6)(ii)(B)

Records concerning health insurance claims if maintained separately from the employer's medical program and its records, and not accessible to the employer by employee name or other direct personal identifier (e.g., social security number, payroll number, etc.), or

1910.1020(c)(6)(ii)(C)

Records created solely in preparation for litigation which are privileged from discovery under the applicable rules of procedure or evidence; or

1910.1020(c)(6)(ii)(D)

Records concerning voluntary employee assistance programs (alcohol, drug abuse, or personal counseling programs) if maintained separately from the employer's medical program and its records.

1910.1020(c)(7)

"Employer" means a current employer, a former employer, or a successor employer.

1910.1020(c)(8)

"Exposure" or "exposed" means that an employee is subjected to a toxic substance or harmful physical agent in the course of employment through any route of entry (inhalation, ingestion, skin contact or absorption, etc.), and includes past exposure and potential (e.g., accidental or possible) exposure, but does not include situations where the employer can demonstrate that the toxic substance or harmful physical agent is not used, handled, stored, generated, or present in the workplace in any manner different from typical non-occupational situations.

1910.1020(c)(9)

"Health Professional" means a physician, occupational health nurse, industrial hygienist, toxicologist, or epidemiologist, providing medical or other occupational health services to exposed employees.

1910.1020(c)(10)

"Record" means any item, collection, or grouping of information regardless of the form or process by which it is maintained (e.g., paper document, microfiche, microfilm, X-ray film, or automated data processing).

1910.1020(c)(11)

"Specific chemical identity" means a chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

1910.1020(c)(12) 1910.1020(c)(12)(i)

"Specific written consent" means a written authorization containing the following:

1910.1020(c)(12)(i)(A)

The name and signature of the employee authorizing the release of medical information,

1910.1020(c)(12)(i)(B)

The date of the written authorization,

1910.1020(c)(12)(i)(C)

The name of the individual or organization that is authorized to release the medical information,

1910.1020(c)(12)(i)(D)

The name of the designated representative (individual or organization) that is authorized to receive the released information,

1910.1020(c)(12)(i)(E)

A general description of the medical information that is authorized to be released,

1910.1020(c)(12)(i)(F)

A general description of the purpose for the release of the medical information, and

1910.1020(c)(12)(i)(G)

A date or condition upon which the written authorization will expire (if less than one year).

1910.1020(c)(12)(ii)

A written authorization does not operate to authorize the release of medical information not in existence on the date of written authorization, unless the release of future information is expressly authorized, and does not operate for more than one year from the date of written authorization.

1910.1020(c)(12)(iii)

A written authorization may be revoked in writing prospectively at any time.

1910.1020(c)(13)

"Toxic substance or harmful physical agent" means any chemical substance, biological agent (bacteria, virus, fungus, etc.), or physical stress (noise, heat, cold, vibration, repetitive motion, ionizing and non-ionizing radiation, hypo - or hyperbaric pressure, etc.) which:

1910.1020(c)(13)(i)

Is listed in the latest printed edition of the National Institute for Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS) which is incorporated by reference as specified in Sec. 1910.6; or

1910.1020(c)(13)(ii)

Has yielded positive evidence of an acute or chronic health hazard in testing conducted by, or known to, the employer; or

1910.1020(c)(13)(iii)

Is the subject of a Safety Data Sheet kept by or known to the employer indicating that the material may pose a hazard to human health.

1910.1020(c)(14)

"Trade secret" means any confidential formula, pattern, process, device, or information or compilation of information that is used in an employer's business and that gives the employer an opportunity to obtain an advantage over competitors who do not know or use it.

1910.1020(d)

"Preservation of records."

1910.1020(d)(1)

Unless a specific occupational safety and health standard provides a different period of time, each employer shall assure the preservation and retention of records as follows:

1910.1020(d)(1)(i)

"Employee medical records." The medical record for each employee shall be preserved and maintained for at least the duration of employment plus thirty (30) years, except that the following types of records need not be retained for any specified period:

1910.1020(d)(1)(i)(A)

Health insurance claims records maintained separately from the employer's medical program and its records,

1910.1020(d)(1)(i)(B)

First aid records (not including medical histories) of one-time treatment and subsequent observation of minor scratches, cuts, burns, splinters, and the like which do not involve medical treatment, loss of consciousness, restriction of work or motion, or transfer to another job, if made on-site by a non-physician and if maintained separately from the employer's medical program and its records, and

1910.1020(d)(1)(i)(C)

The medical records of employees who have worked for less than (1) year for the employer need not be retained beyond the term of employment if they are provided to the employee upon the termination of employment.

1910.1020(d)(1)(ii)

"Employee exposure records." Each employee exposure record shall be preserved and maintained for at least thirty (30) years, except that:

1910.1020(d)(1)(ii)(A)

Background data to environmental (workplace) monitoring or measuring, such as laboratory reports and worksheets, need only be retained for one (1) year so long as the sampling results, the collection methodology (sampling plan), a description of the analytical and mathematical methods used, and a summary of other background data relevant to interpretation of the results obtained, are retained for at least thirty (30) years; and

1910.1020(d)(1)(ii)(B)

Safety Data Sheets and paragraph (c)(5)(iv) records concerning the identity of a substance or agent need not be retained for any specified period as long as some record of the identity (chemical name if known) of the substance or agent, where it was used, and when it was used is retained for at least thirty (30) years(1); and

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Footnote(1) Safety Data Sheets must be kept for those chemicals currently in use that are effected by the Hazard Communication Standard in accordance with 29 CFR 1910.1200(g).

1910.1020(d)(1)(ii)(C)

Biological monitoring results designated as exposure records by specific occupational safety and health standards shall be preserved and maintained as required by the specific standard.

1910.1020(d)(1)(iii)

"Analyses using exposure or medical records." Each analysis using exposure or medical records shall be preserved and maintained for at least thirty (30) years.

1910.1020(d)(2)

Nothing in this section is intended to mandate the form, manner, or process by which an employer preserves a record so long as the information contained in the record is preserved and retrievable, except that chest X-ray films shall be preserved in their original state.

1910.1020(e)

"Access to records" -

1910.1020(e)(1)

"General."

1910.1020(e)(1)(i)

Whenever an employee or designated representative requests access to a record, the employer shall assure that access is provided in a reasonable time, place, and manner. If the employer cannot reasonably provide access to the record within fifteen (15) working days, the employer shall within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available.

1910.1020(e)(1)(ii)

The employer may require of the requester only such information as should be readily known to the requester and which may be necessary to locate or identify the records being requested (e.g. dates and locations where the employee worked during the time period in question).

1910.1020(e)(1)(iii)

Whenever an employee or designated representative requests a copy of a record, the employer shall assure that either:

1910.1020(e)(1)(iii)(A)

A copy of the record is provided without cost to the employee or representative,

1910.1020(e)(1)(iii)(B)

The necessary mechanical copying facilities (e.g., photocopying) are made available without cost to the employee or representative for copying the record, or

1910.1020(e)(1)(iii)(C)

The record is loaned to the employee or representative for a reasonable time to enable a copy to be made.

1910.1020(e)(1)(iv)

In the case of an original X-ray, the employer may restrict access to on-site examination or make other suitable arrangements for the temporary loan of the X-ray.

1910.1020(e)(1)(v)

Whenever a record has been previously provided without cost to an employee or designated representative, the employer may charge reasonable, non-discriminatory administrative costs (i.e., search and copying expenses but not including overhead expenses) for a request by the employee or designated representative for additional copies of the record, except that

1910.1020(e)(1)(v)(A)

An employer shall not charge for an initial request for a copy of new information that has been added to a record which was previously provided; and

1910.1020(e)(1)(v)(B)

An employer shall not charge for an initial request by a recognized or certified collective bargaining agent for a copy of an employee exposure record or an analysis using exposure or medical records.

1910.1020(e)(1)(vi)

Nothing in this section is intended to preclude employees and collective bargaining agents from collectively bargaining to obtain access to information in addition to that available under this section.

1910.1020(e)(2)

"Employee and designated representative access" -

1910.1020(e)(2)(i)

"Employee exposure records."

1910.1020(e)(2)(i)(A)

Except as limited by paragraph (f) of this section, each employer shall, upon request, assure the access to each employee and designated representative to employee exposure records relevant to the employee. For the purpose of this section, an exposure record relevant to the employee consists of:

1910.1020(e)(2)(i)(A)(1)

A record which measures or monitors the amount of a toxic substance or harmful physical agent to which the employee is or has been exposed;

1910.1020(e)(2)(i)(A)(2)

In the absence of such directly relevant records, such records of other employees with past or present job duties or working conditions related to or similar to those of the employee to the extent necessary to reasonably indicate the amount and nature of the toxic substances or harmful physical agents to which the employee is or has been subjected, and

1910.1020(e)(2)(i)(A)(3)

Exposure records to the extent necessary to reasonably indicate the amount and nature of the toxic substances or harmful physical agents at workplaces or under working conditions to which the employee is being assigned or transferred.

1910.1020(e)(2)(i)(B)

Requests by designated representatives for unconsented access to employee exposure records shall be in writing and shall specify with reasonable particularity:

1910.1020(e)(2)(i)(B)(1)

The record requested to be disclosed; and

1910.1020(e)(2)(i)(B)(2)

The occupational health need for gaining access to these records.

1910.1020(e)(2)(ii)

"Employee medical records."

1910.1020(e)(2)(ii)(A)

Each employer shall, upon request, assure the access of each employee to employee medical records of which the employee is the subject, except as provided in paragraph (e)(2)(ii)(D) of this section.

1910.1020(e)(2)(ii)(B)

Each employer shall, upon request, assure the access of each designated representative to the employee medical records of any employee who has given the designated representative specific written consent. Appendix A to this section contains a sample form which may be used to establish specific written consent for access to employee medical records.

1910.1020(e)(2)(ii)(C)

Whenever access to employee medical records is requested, a physician representing the employer may recommend that the employee or designated representative:

1910.1020(e)(2)(ii)(C)(1)

Consult with the physician for the purposes of reviewing and discussing the records requested,

1910.1020(e)(2)(ii)(C)(2)

Accept a summary of material facts and opinions in lieu of the records requested, or

1910.1020(e)(2)(ii)(C)(3)

Accept release of the requested records only to a physician or other designated representative.

1910.1020(e)(2)(ii)(D)

Whenever an employee requests access to his or her employee medical records, and a physician representing the employer believes that direct employee access to information contained in the records regarding a specific diagnosis of a terminal illness or a psychiatric condition could be detrimental to the employee's health, the employer may inform the employee that access will only be provided to a designated representative of the employee having specific written consent, and deny the employee's request for direct access to this information only. Where a designated representative with specific written consent requests access to information so withheld, the employer shall assure the access of the designated representative to this information, even when it is known that the designated representative will give the information to the employee.

1910.1020(e)(2)(ii)(E)

A physician, nurse, or other responsible health care personnel maintaining employee medical records may delete from requested medical records the identity of a family member, personal friend, or fellow employee who has provided confidential information concerning an employee's health status.

1910.1020(e)(2)(iii)

Analyses using exposure or medical records.

1910.1020(e)(2)(iii)(A)

Each employer shall, upon request, assure the access of each employee and designated representative to each analysis using exposure or medical records concerning the employee's working conditions or workplace.

1910.1020(e)(2)(iii)(B)

Whenever access is requested to an analysis which reports the contents of employee medical records by either direct identifier (name, address, social security number, payroll number, etc.) or by information which could reasonably be used under the circumstances indirectly to identify specific employees (exact age, height, weight, race, sex, date of initial employment, job title, etc.), the employer shall assure that personal identifiers are removed before access is provided. If the employer can demonstrate that removal of personal identifiers from an analysis is not feasible, access to the personally identifiable portions of the analysis need not be provided.

1910.1020(e)(3)

"OSHA access."

1910.1020(e)(3)(i)

Each employer shall, upon request, and without derogation of any rights under the Constitution or the Occupational Safety and Health Act of 1970, 29 U.S.C. 651 "et seq.," that the employer chooses to exercise, assure the prompt access of representatives of the Assistant Secretary of Labor for Occupational Safety and Health to employee exposure and medical records and to analyses using exposure or medical records. Rules of agency practice and procedure governing OSHA access to employee medical records are contained in 29 CFR 1913.10.

1910.1020(e)(3)(ii)

Whenever OSHA seeks access to personally identifiable employee medical information by presenting to the employer a written access order pursuant to 29 CFR 1913.10(d), the employer shall prominently post a copy of the written access order and its accompanying cover letter for at least fifteen (15) working days.

1910.1020(f)

"Trade secrets."

1910.1020(f)(1)

Except as provided in paragraph (f)(2) of this section, nothing in this section precludes an employer from deleting from records requested by a health professional, employee, or designated representative any trade secret data which discloses manufacturing processes, or discloses the percentage of a chemical substance in mixture, as long as the health professional, employee, or designated representative is notified that information has been deleted. Whenever deletion of trade secret information substantially impairs evaluation of the place where or the time when exposure to a toxic substance or harmful physical agent occurred, the employer shall provide alternative information which is sufficient to permit the requesting party to identify where and when exposure occurred.

1910.1020(f)(2)

The employer may withhold the specific chemical identity, including the chemical name and other specific identification of a toxic substance from a disclosable record provided that:

1910.1020(f)(2)(i)

The claim that the information withheld is a trade secret can be supported;

1910.1020(f)(2)(ii)

All other available information on the properties and effects of the toxic substance is disclosed;

1910.1020(f)(2)(iii)

The employer informs the requesting party that the specific chemical identity is being withheld as a trade secret; and

1910.1020(f)(2)(iv)

The specific chemical identity is made available to health professionals, employees and designated representatives in accordance with the specific applicable provisions of this paragraph.

1910.1020(f)(3)

Where a treating physician or nurse determines that a medical emergency exists and the specific chemical identity of a toxic substance is necessary for emergency or first-aid treatment, the employer shall immediately disclose the specific chemical identity of a trade secret chemical to the treating physician or nurse, regardless of the existence of a written statement of need or a confidentiality agreement. The employer may require a written statement of need and confidentiality agreement, in accordance with the provisions of paragraphs (f)(4) and (f)(5), as soon as circumstances permit.

1910.1020(f)(4)

In non-emergency situations, an employer shall, upon request, disclose a specific chemical identity, otherwise permitted to be withheld under paragraph (f)(2) of this section, to a health professional, employee, or designated representative if:



1910.1020(f)(4)(i)

The request is in writing;

1910.1020(f)(4)(ii)

The request describes with reasonable detail one or more of the following occupational health needs for the information:

1910.1020(f)(4)(ii)(A)

To assess the hazards of the chemicals to which employees will be exposed;

1910.1020(f)(4)(ii)(B)

To conduct or assess sampling of the workplace atmosphere to determine employee exposure levels;

1910.1020(f)(4)(ii)(C)

To conduct pre-assignment or periodic medical surveillance of exposed employees;

1910.1020(f)(4)(ii)(D)

To provide medical treatment to exposed employees;

1910.1020(f)(4)(ii)(E)

To select or assess appropriate personal protective equipment for exposed employees;

1910.1020(f)(4)(ii)(F)

To design or assess engineering controls or other protective measures for exposed employees; and

1910.1020(f)(4)(ii)(G)

To conduct studies to determine the health effects of exposure.

1910.1020(f)(4)(iii)

The request explains in detail why the disclosure of the specific chemical identity is essential and that, in lieu thereof, the disclosure of the following information would not enable the health professional, employee or designated representative to provide the occupational health services described in paragraph (f)(4)(ii) of this section;

1910.1020(f)(4)(iii)(A)

The properties and effects of the chemical;

1910.1020(f)(4)(iii)(B)

Measures for controlling workers' exposure to the chemical;

1910.1020(f)(4)(iii)(C)

Methods of monitoring and analyzing worker exposure to the chemical; and

1910.1020(f)(4)(iii)(D)

Methods of diagnosing and treating harmful exposures to the chemical;

1910.1020(f)(4)(iv)

The request includes a description of the procedures to be used to maintain the confidentiality of the disclosed information; and

1910.1020(f)(4)(v)

The health professional, employee, or designated representative and the employer or contractor of the services of the health professional or designated representative agree in a written confidentiality agreement that the health professional, employee or designated representative will not use the trade secret information for any purpose other than the health need(s) asserted and agree not to release the information under any circumstances other than to OSHA, as provided in paragraph (f)(7) of this section, except as authorized by the terms of the agreement or by the employer.

1910.1020(f)(5)

The confidentiality agreement authorized by paragraph (f)(4)(iv) of this section:

1910.1020(f)(5)(i)

May restrict the use of the information to the health purposes indicated in the written statement of need;

1910.1020(f)(5)(ii)

May provide for appropriate legal remedies in the event of a breach of the agreement, including stipulation of a reasonable pre-estimate of likely damages; and,

1910.1020(f)(5)(iii)

May not include requirements for the posting of a penalty bond.

1910.1020(f)(6)

Nothing in this section is meant to preclude the parties from pursuing non-contractual remedies to the extent permitted by law.

1910.1020(f)(7)

If the health professional, employee or designated representative receiving the trade secret information decides that there is a need to disclose it to OSHA, the employer who provided the information shall be informed by the health professional prior to, or at the same time as, such disclosure.

1910.1020(f)(8)

If the employer denies a written request for disclosure of a specific chemical identity, the denial must:

1910.1020(f)(8)(i)

Be provided to the health professional, employee or designated representative within thirty days of the request;

1910.1020(f)(8)(ii)

Be in writing;

1910.1020(f)(8)(iii)

Include evidence to support the claim that the specific chemical identity is a trade secret;

1910.1020(f)(8)(iv)

State the specific reasons why the request is being denied; and,

1910.1020(f)(8)(v)

Explain in detail how alternative information may satisfy the specific medical or occupational health need without revealing the specific chemical identity.

1910.1020(f)(9)

The health professional, employee, or designated representative whose request for information is denied under paragraph (f)(4) of this section may refer the request and the written denial of the request to OSHA for consideration.

1910.1020(f)(10)

When a health professional, employee, or designated representative refers a denial to OSHA under paragraph (f)(9) of this section, OSHA shall consider the evidence to determine if:

1910.1020(f)(10)(i)

The employer has supported the claim that the specific chemical identity is a trade secret;

1910.1020(f)(10)(ii)

The health professional employee, or designated representative has supported the claim that there is a medical or occupational health need for the information; and

1910.1020(f)(10)(iii)

The health professional, employee or designated representative has demonstrated adequate means to protect the confidentiality.

1910.1020(f)(11) 1910.1020(f)(11)(i)

If OSHA determines that the specific chemical identity requested under paragraph (f)(4) of this section is not a "bona fide" trade secret, or that it is a trade secret but the requesting health professional, employee or designated representatives has a legitimate medical or occupational health need for the information, has executed a written confidentiality agreement, and has shown adequate means for complying with the terms of such agreement, the employer will be subject to citation by OSHA.

1910.1020(f)(11)(ii)

If an employer demonstrates to OSHA that the execution of a confidentiality agreement would not provide sufficient protection against the potential harm from the unauthorized disclosure of a trade secret specific chemical identity, the Assistant Secretary may issue such orders or impose such additional limitations or conditions upon the disclosure of the requested chemical information as may be appropriate to assure that the occupational health needs are met without an undue risk of harm to the employer.

1910.1020(f)(12)

Notwithstanding the existence of a trade secret claim, an employer shall, upon request, disclose to the Assistant Secretary any information which this section requires the employer to make available. Where there is a trade secret claim, such claim shall be made no later than at the time the information is provided to the Assistant Secretary so that suitable determinations of trade secret status can be made and the necessary protections can be implemented.

1910.1020(f)(13)

Nothing in this paragraph shall be construed as requiring the disclosure under any circumstances of process or percentage of mixture information which is a trade secret.

1910.1020(g)

"Employee information."

1910.1020(g)(1)

Upon an employee's first entering into employment, and at least annually thereafter, each employer shall inform current employees covered by this section of the following:

1910.1020(g)(1)(i)

The existence, location, and availability of any records covered by this section;

1910.1020(g)(1)(ii)

The person responsible for maintaining and providing access to records; and

1910.1020(g)(1)(iii)

Each employee's rights of access to these records.

1910.1020(g)(2)

Each employer shall keep a copy of this section and its appendices, and make copies readily available, upon request, to employees. The employer shall also distribute to current employees any informational materials concerning this section which are made available to the employer by the Assistant Secretary of Labor for Occupational Safety and Health.

1910.1020(h)

"Transfer of records."

1910.1020(h)(1)

Whenever an employer is ceasing to do business, the employer shall transfer all records subject to this section to the successor employer. The successor employer shall receive and maintain these records.

1910.1020(h)(2)

Whenever an employer is ceasing to do business and there is no successor employer to receive and maintain the records subject to this standard, the employer shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business.

**Part Title: Occupational Safety and Health Standards**

**Subpart: Z**

**Subpart Title: Toxic and Hazardous Substances**

**Appendix A** – See “Access to Employee Exposure and Medical Records – Release of Medical or Exposure Records Consent Form”

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**Part Title: Occupational Safety and Health Standards**

**Subpart: Z**

**Subpart Title: Toxic and Hazardous Substances**

**Standard Number: 1910.1020 App B**

**Title: Availability of NIOSH registry of toxic effects of chemical substances (RTECS)(Non-mandatory)**

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The final standard, 29 CFR 1910.1020, applies to all employee exposure and medical records, and analyses thereof, of employees exposed to toxic substances or harmful physical agents (paragraph (b)(2)). The term "toxic substance or harmful physical agent" is defined by paragraph (c)(13) to encompass chemical substances, biological agents, and physical stresses for which there is evidence of harmful health effects. The regulation uses the latest printed edition of the National Institute for Occupational Safety and Health (NIOSH) Registry of Toxic Effects of Chemical Substances (RTECS) as one of the chief sources of information as to whether evidence of harmful health effects exists. If a substance is listed in the latest printed RTECS, the regulation applies to exposure and medical records (and analyses of these records) relevant to employees exposed to the substance.

It is appropriate to note that the final regulation does not require that employers purchase a copy of RTECS, and many employers need not consult RTECS to ascertain whether their employee exposure or medical records are subject to the rule. Employers who do not currently have the latest printed edition of the NIOSH RTECS, however, may desire to obtain a copy. The RTECS is issued in an annual printed edition as mandated by section 20(a)(6) of the Occupational Safety and Health Act (29 U.S.C. 669(a)(6)).

The introduction to the 1980 printed edition describes the RTECS as follows:

"The 1980 edition of the Registry of Toxic Effects of Chemical Substances, formerly known as the Toxic Substances list, is the ninth revision prepared in compliance with the requirements of Section 20(a)(6) of the Occupational Safety and Health Act of 1970 (Public Law 91-596). The original list was completed on June 28, 1971, and has been updated annually in book format. Beginning in October 1977, quarterly revisions have been provided in microfiche. This edition of the Registry contains 168,096 listings of chemical substances; 45,156 are names of different chemicals with their associated toxicity data and 122,940 are synonyms. This edition includes approximately 5,900 new chemical compounds that did not appear in the 1979 Registry.(p. xi)

"The Registry's purposes are many, and it serves a variety of users. It is a single source document for basic toxicity information and for other data, such as chemical identifiers and information necessary for the preparation of safety directives and hazard evaluations for chemical substances. The various types of toxic effects linked to literature citations provide researchers and occupational health scientists with an introduction to the toxicological literature, making their own review of the toxic hazards of a given substance easier. By presenting data on the lowest reported doses that produce effects by several routes of entry in various species, the Registry furnishes valuable information to those responsible for preparing safety data sheets for chemical substances in the workplace. Chemical and production engineers can use the Registry to identify the hazards which may be associated with chemical intermediates in the development of final products, and thus can more readily select substitutes or alternate processes which may be less hazardous. Some organizations, including health agencies and chemical companies, have included the NIOSH Registry accession numbers with the listing of chemicals in their files to reference toxicity information associated with those chemicals. By including foreign language chemical names, a start has been made toward providing rapid identification of substances produced in other countries.(p xi)

"In this edition of the Registry, the editors intend to identify "all known toxic substances" which may exist in the environment and to provide pertinent data on the toxic effects from known doses entering an organism by any route described.(p xi)

"It must be reemphasized that the entry of a substance in the Registry does not automatically mean that it must be avoided. A listing does mean, however, that the substance has the documented potential of being harmful if misused, and care must be exercised to prevent tragic consequences. Thus the Registry lists many substances that are common in everyday life and are in nearly every household in the United States. One can name a variety of such dangerous substances: prescription and non-prescription drugs; food additives; pesticide concentrates, sprays, and dusts; fungicides; herbicides, paints; glazes, dyes; bleaches and other household cleaning agents; alkalis; and various solvents and diluents. The list is extensive because chemicals have become an integral part of our existence."

The RTECS printed edition may be purchased from the Superintendent of Documents, U.S. Government Printing Office (GPO), Washington, DC 20402 (202-783-3238).

Some employers may desire to subscribe to the quarterly update to the RTECS which is published in a microfiche edition. An annual subscription to the quarterly microfiche may be purchased from the GPO (Order the "Microfiche Edition, Registry of Toxic Effects of Chemical Substances"). Both the printed edition and the microfiche edition of RTECS are available for review at many university and public libraries throughout the country. The latest RTECS editions may also be examined at the OSHA Technical Data Center, Room N2439 - Rear, United States Department of Labor, 200 Constitution Avenue, N.W., Washington, DC 20210 (202-523-9700), or at any OSHA Regional or Area Office (See, major city telephone directories under United States Government - Labor Department).

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# TRAINING ATTENDANCE ROSTER

## ACCESS TO EXPOSURE AND MEDICAL RECORDS

**Access to Employee Exposure and Medical Records Training Includes:**

- Purpose of Regulation
- What is access
- What records are kept and for how long
- How to access records
- Company and employee rights
- Trade secret protections
- Transfer and disposal of records
- Release consent for records

**INSTRUCTOR:**

**DATE:**

**LOCATION:**

NAME (Please Print)  
FIRST - MI - LAST

**SIGNATURE**

By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized: \_\_\_\_\_

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# **Accident Investigation and Reporting**

## PROGRAM OVERVIEW

# ACCIDENT INVESTIGATION AND REPORTING SAFETY PROGRAM

REGULATORY STANDARD: General Duty Clause

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## **INTRODUCTION**

The accident investigation and reporting program is a tool used to ensure notification of accidents and assist in the correction action process. Accident investigation is primarily a fact-finding procedure - the facts revealed are used to prevent recurrences of similar accidents in the future.

## **TRAINING**

- Supervisors should be trained in accident investigation
- Employees should be trained on when and how to report accidents and incidents

## **ACTIVITIES**

- Determine who is a part of the Accident Investigation Team, which may include supervisors, management, and employees
- Determine accident and near miss reporting procedures
- Inform employees of the work-related injuries and illness procedures and their rights to report
- OSHA Recordkeeping, forms 300 and 301 or equivalent
- Injury trending

## **FORMS**

- Accident, Incident, or Near Miss Investigation Report
- Training Attendance Roster - Accident Investigation
- Training Attendance Roster – Accident Reporting

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

# ACCIDENT INVESTIGATION AND REPORTING SAFETY PROGRAM

1. **Purpose.** Accidents and Incidents result from a failure of people, equipment, supplies, or surroundings. A successful accident investigation determines not only what happened, but also attempts to find out how and why the accident occurred. Investigations are an effort to prevent a similar or perhaps more disastrous sequence of events. The company will review and evaluate this safety program:
  - 1.1 When changes occur that prompt revision of this document (within the company or to regulatory documents)
  - 1.2 When facility operational changes occur that require a revision of this document
2. **Scope.** This program applies to the total workplace regardless of the number of workers employed or the number of work shifts.
3. **Responsibilities**
  - 3.1 Management:
    - 3.1.1 Ensure supervisors are trained in accident investigation, as needed or required.
    - 3.1.2 Inform employees of the company's work-related injury or illness procedures and the employees' rights to report work-related injuries and illnesses.
    - 3.1.3 Provide resources, as needed or required, to implement corrective actions based on results of incident investigations.
    - 3.1.4 Review incident reports and any incident trends to establish corrective and preventive actions.
    - 3.1.5 Communicate incident information to other areas of the company where similar incidents may occur, and implement preventive actions to eliminate the potential for future incidents.
    - 3.1.6 Maintain required documentation.
    - 3.1.7 Train appropriate personnel to review and implement Job Hazard Analysis and Trend Analysis as needed.
  - 3.2 Supervisor
    - 3.2.1 Provide or arrange for adequate medical treatment for any injured employee.
    - 3.2.2 Promptly investigate any incidents or near miss incidents that occur.
    - 3.2.3 Provide recommendations to management on corrective actions to prevent recurrence of similar incidents.

### 3.3 Employees

- 3.3.1 Promptly report incidents or near misses that occur.
- 3.3.2 Report hazardous conditions to your supervisor.
- 3.3.3 Participate in incident investigations, as needed or required.

## 4. Procedure

- 4.1 Inform employees of the company's work-related injury or illness procedures and the employees' rights to report work-related injuries and illnesses without fear of being discriminated against in any manner or fear of being discharged. Post the OSHA "It's The Law" worker rights poster.
- 4.2 Accident Investigation Team Composition. Supervisors, in conjunction with the safety officer as needed or required, are primarily responsible for the investigation of accidents and incidents. In addition, members of the safety committee or a separate Accident Investigation Team may serve as incident investigators.
- 4.3 Hazard Reporting:
  - 4.3.1 Hazards or potential hazards identified by employees will immediately be reported to management or supervision.
    - 4.3.1.1 Person reporting hazard
      - Notify department Supervisor of the hazard.
      - Initiate lock-out/tag-out, if required, on the machine.
    - 4.3.1.2 Supervisor
      - Notify all affected workers of hazard.
      - Notify Maintenance Department of hazard, if required.
      - Ensure hazard is properly marked and controlled until corrected.
- 4.4 Accident Investigation, Analysis and Reporting. Accident investigation is primarily a fact-finding procedure; the facts revealed are used to prevent recurrences of similar accidents. The focus of accident investigation will be to prevent future accidents and injuries to increase the safety and health of all our employees.
  - 4.4.1 Immediate concerns:
    - 4.4.1.1 Ensure any injured person receives proper care.

- 4.4.1.2 Ensure co-workers and personnel working with similar equipment or in similar jobs are aware of the situation. This is to ensure that procedural problems or defects in certain models of equipment do not exist.
- 4.4.1.3 Start the investigation promptly.
- 4.4.2 Accident Investigation and Reporting Form. OSHA Form 301 (or a standardized investigation report form which details specific company requirements for investigation) will be used to gather data to determine causes and corrective actions. As a minimum the form will contain the following areas of concern.
  - 4.4.2.1 Injured employee's name and any other identifier
  - 4.4.2.2 Employee's address
  - 4.4.2.3 Date and time of injury
  - 4.4.2.4 Shift and department
  - 4.4.2.5 Sex/DOB
  - 4.4.2.6 Length of service (hire date) and length of time at specific job
  - 4.4.2.7 Time shift started
  - 4.4.2.8 Physician's and hospital name (if transported)
  - 4.4.2.9 Indication if employee was hospitalized as an in-patient (i.e. overnight)
  - 4.4.2.10 Type of injury
  - 4.4.2.11 Body part or body system injured
  - 4.4.2.12 Resulting fatalities (date of death)
  - 4.4.2.13 Occupation or task being performed just prior to being injured
  - 4.4.2.14 Description and analysis of accident
  - 4.4.2.15 Indication of the object or substance that directly harmed the employee
  - 4.4.2.16 Name of person completing form, their title, phone number and the date

- 4.4.3 Additional information that is recommended on the form is:
  - 4.4.3.1 Time shift started
  - 4.4.3.2 Overtime length when injury occurred
  - 4.4.3.3 Action taken to prevent recurrence
  - 4.4.3.4 Employee's statement
  - 4.4.3.5 Witnesses' statement
  - 4.4.3.6 Employer's statement
  - 4.4.3.7 Name of person(s) reviewing form and date of review
- 4.5 Accident Investigation Review Team. A member of management responsible will review all Incident Reports for the department/section involved ensuring pertinent information is transmitted to all concerned and remedial action(s) taken.
- 4.6 Accident Investigation Final Report. The report will include but is not limited to the following:
  - 4.6.1 Investigation report form and pertinent data
  - 4.6.2 Photographs/drawings/exhibits of scene
  - 4.6.3 Narrative of accident
  - 4.6.4 Sequence of events
  - 4.6.5 Contributing information
  - 4.6.6 Findings and recommendations of review team
  - 4.6.7 Action items and completion dates
  - 4.6.8 Responsible persons
  - 4.6.9 Follow-up procedures to ensure completion
  - 4.6.10 Distribution list
- 4.7 Safety and Job Hazard Analysis. The company will identify through the use of information sources, screening and job surveys any activities that place employees at risk. After any accident or near miss, the task or job in question will have a job hazard analyses routinely performed by a qualified person(s). This analysis will help to verify that all required actions are being taken to determine if risk factors for a work position have been reduced or eliminated to the maximum extent feasible.

- 4.7.1 Workstation Analysis. Workstation analysis will be conducted to identify risk factors present in each job or workstation.

## 5. Safety Information:

- 5.1 Administrative Controls. Once data has been gathered from the Incident Report, administrative controls will be used where needed to eliminate or reduce the frequency and severity of accidents and near misses. Examples of administrative controls include the following:
  - 5.1.1 Reducing the production rates and or line speeds where possible.
  - 5.1.2 Providing rest pauses to relieve fatigued muscle-tendon groups.
  - 5.1.3 Increasing the number of employees assigned to a task to alleviate severe conditions, especially in lifting heavy objects.
  - 5.1.4 Using job rotation and as a preventive measure, not as a response to physical symptoms. The principle of job rotation is to alleviate physical fatigue and stress of a particular set of muscles and tendons by rotating employees among other jobs that use different muscle-tendon groups. If rotation is utilized, the job analyses must be reviewed to ensure that the same muscle-tendon groups are not used when they are rotated.
  - 5.1.5 Providing sufficient numbers of standby/relief personnel to compensate for foreseeable upset conditions on the line (e.g., loss of workers).
  - 5.1.6 Job enlargement. Having employees perform broader functions which reduce the stress on specific muscle groups while performing individual tasks.
  - 5.1.7 Machine maintenance/guarding. Ensure regular maintenance is performed on machines and/or tools used by employees are properly guarded and that maintenance is routinely performed.
  - 5.1.8 Employee training. Ensure all employees are properly trained in the hazards associated with the job before work is performed unsupervised.
- 5.2 Medical Management. The Safety Officer or other designated person will manage the safety program. Employees of each work shift should have access to health care providers or designated alternates in order to facilitate treatment, surveillance activities, and recording of information. During an accident investigation the medical management safety program will, as a minimum, address the following issues:
  - 5.2.1 Injury and illness recordkeeping
  - 5.2.2 Early recognition of problems such as strains and muscle fatigue that could lead to accidents
  - 5.2.3 Systematic evaluation and referral

- 5.2.4 Conservative treatment after an accident
- 5.2.5 Conservative return to work after an accident
- 5.2.6 Systematic monitoring
- 5.2.7 Recordability criteria. The accident must be work related. Simply stated, unless the illness was caused solely by a non-work-related event or exposure off-premises, the case is presumed to be work related.
- 5.2.8 Occupational injuries. Injuries are caused by instantaneous events in the work environment. To keep recordkeeping determinations as simple and equitable as possible, back cases are classified as injuries even though some back conditions may be triggered by an instantaneous event and others develop as a result of repeated trauma. Any occupational injury involving any of the following circumstances is to be recorded on the OSHA-Form 300:
  - 5.2.8.1 Medical treatment resulting from significant injury/illness as diagnosed by a physician or other licensed health care professional
  - 5.2.8.2 Loss of consciousness
  - 5.2.8.3 Restriction of work or motion
  - 5.2.8.4 Contaminated needle stick or sharp exposure
  - 5.2.8.5 Work related tuberculosis infection
  - 5.2.8.6 Cases of medical removal as required under specific OSHA Regulatory Standard
  - 5.2.8.7 Transfer to another job
- 5.2.9 When an incident is recorded on the OSHA Form 300, that same incident must also be recorded on OSHA Form 301.
- 5.2.10 Periodic Workplace Walk-throughs. Supervisors, in conjunction with the Safety Officer or Health Care provider as needed or required, will conduct periodic, systematic workplace walk-throughs on a monthly basis (OSHA recommended) to remain knowledgeable about operations and work practices, to identify potential light duty jobs, and to maintain close contact with employees. Safety Officers and Health care providers also should be involved in identifying accident risk factors in the workplace as part of the Accident Investigation Team. A record will be kept documenting the date of the walk-through, area(s) visited, accident risk factors recognized, and action initiated to correct identified problems. Follow-up will be initiated and documented to ensure corrective action is taken when indicated.



## 5.3 Accident Trend Analysis

- 5.3.1 The information gathered from incident investigations, OSHA logs and hazard reports will help to identify areas or jobs where potential accident or injury conditions could or do exist. This information may be shared with anyone in the company since employees' personal identifiers are not solicited. The analysis of medical records (e.g., sign-in logs and individual employee medical records) may reveal areas or jobs of concern, but it may also identify individual workers who require further follow-up. The information gathered while analyzing medical records will be of a confidential nature, therefore care must be exercised to protect the individual employee's privacy.
- 5.3.2 The information gained from the trend analysis may help determine the effectiveness of the various safety programs initiated to decrease accidents in our facility.
- 5.3.3 Employee survey or Job Hazard Analysis. A survey may be used to provide a standardized measure of the extent of progress in reducing work-related accidents for each area of the plant or facility. This will determine which jobs are exhibiting problems and measure progress of the overall safety program.
  - 5.3.3.1 Design of the survey. A survey of employees will be conducted to measure employee awareness of work-related accident and to report the location, frequency, and type of accidents likely to occur.
  - 5.3.3.2 Surveys normally will not include an employee's personal identifiers. This is to encourage employee participation in the survey.
  - 5.3.3.3 Frequency. Surveys will be conducted anytime deemed necessary by the Accident Investigation Team. Conducting the survey should help detect any major change in the prevalence, incidence, and/or location of reported and unreported accidents.
- 5.3.4 List of Jobs. The company will compile a list of jobs, tasks and activities. This listing should be prioritized, based on the risk factors for type of injury (s) sustained. Jobs will be analyzed to determine the physical procedures used in the performance of each job including lifting requirements, postures, handgrips, frequency of repetitive motion, and general safety requirements of the job. This information will assist health care providers in recommending assignments to light or restricted duty jobs. Supervisors should periodically review and update the lists.

## 6. Training and Information

- 6.1 The purpose of accident investigation training and education is to ensure those members of the Accident Investigation Team and all of our employees are sufficiently informed about the Accident Investigation Safety Program.

- 6.1.1 Employees should be adequately trained about the company's Accident Investigation Safety Program. Proper training will allow managers, supervisors, and employees to understand the procedures to follow to report an accident, hazards associated with a job or production process, their prevention and control, and their medical consequences.
- 6.1.2 Training program design. The program will be designed and implemented by the Safety Officer, Senior Manager or other designated person. Appropriate special training will be provided for personnel responsible for administering the program.
- 6.1.3 Learning level. The safety program will be presented in language and at a level of understanding appropriate for the individuals being trained. It will provide an overview of the potential risk of illnesses and injuries, their causes and early symptoms, the means of prevention, and treatment.
- 6.1.4 Training for affected employees will consist of both general and specific job training:
  - 6.1.4.1 General Training. Employees will be given formal instruction on the hazards associated with their jobs and with their equipment. This will include information on the varieties of hazards associated with the job, what risk factors cause or contribute to them, how to recognize and report hazardous conditions, and how to prevent accident with their respective jobs. This instruction will be repeated for each employee as necessary.
  - 6.1.4.2 Job-Specific Training. New employees and reassigned workers will receive an initial orientation and hands-on training before being placed in a full-production job. Each new hire will receive a demonstration of the proper use of and procedures for all tools and equipment before assignment.
- 6.1.5 Training for Supervisors. Supervisors are responsible for ensuring that employees follow safe work practices and receive appropriate training to enable them to do this. Supervisors therefore will undergo training comparable to that of the employees. Such additional training as will enable them to recognize and correct hazardous work practices, proper accident reporting/investigation requirements, and to reinforce the company safety program.
- 6.1.6 Training for Managers. Managers will be made aware of their safety and health responsibilities and will receive sufficient training pertaining to issues at each workstation and in the production process as a whole so that they can effectively carry out their responsibilities.
- 6.1.7 Training for Engineers and Maintenance Personnel. Plant engineers and maintenance personnel will be trained in the prevention and correction of job hazards through job and workstation design and proper maintenance, both in general and as applied to the specific conditions of the facility.

6.2 Employee Training and Education. Health care providers will participate in the training and education of all employees, as needed or required. This training will be reinforced during workplace walk-throughs and the individual health surveillance appointments. All new employees will be given such education during orientation. This demonstration of concern along with the distribution of information should facilitate early recognition of accident conditions before their development, an elimination or reduction in accidents, and increased likelihood of compliance with recognition, prevention, and control.

## 7. Definitions.

- *Accident* - An injury or substance exposure that results in a detrimental health effect to an individual.
- *Incident* – An event that results in an accident, near miss or property damage.
- *Near Miss* – An avoided accident. An incident that could have occurred, but due to mitigating circumstances (or luck) did not occur.

# ACCIDENT, INCIDENT OR NEAR MISS INVESTIGATION REPORT

## PART 1 IDENTIFICATION INFORMATION

Employee Name	
Date of Accident	Time: <span style="float: right;">AM PM</span>
Occupation	Shift
Department	SS#:
Employee Home Address:	Date of Birth:
	Date of Hire
	Gender: Male ___ Female ___

## PART 2 SUPPLEMENTARY INFORMATION

Company			
Mailing Address			
City	State	Zip	
Telephone (     )			
Accident Location	<input type="radio"/> Same as establishment?	<input type="radio"/> On premises?	(Check if applies)
Location Where Accident Occurred (if different from above):			
Remarks:			
Was injured person performing regular job at time of accident? <input type="radio"/> Yes <input type="radio"/> No			
Describe activity the person was doing just before they were injured:			
Length of Service: With Employer		On this job	
Time shift started	AM    PM	Overtime?	<input type="radio"/> Yes <input type="radio"/> No
Name and address of physician:			
City	State	Zip	
Employee treated in an emergency room? ___ Yes ___ No.		Employee hospitalized overnight? ___ Yes ___ No	
If hospitalized, name and address of hospital:			
City	State	Zip	
Fatality? <input type="radio"/> Yes <input type="radio"/> No		If Yes, date of death	

## PART 3 ACCIDENT TREE

<b>NATURE OF INJURY OR ILLNESS:</b>			<b>PART OF BODY AFFECTED:</b>		
<b>Operation Location:</b>	<b>Operation Task:</b>	<b>Employee Task:</b>	<b>Employee Body Position/Activity</b>	<b>Preceding Situation or Event</b>	<b>Type of Accident</b>

## PART 4 DESCRIPTION AND ANALYSIS

Fully describe accident:

What factors led to the accident (from Part 3/Tree)?

### MACHINERY/EQUIPMENT INVOLVED

Manufacturer		Equip. age	
Serial No.	Model		
Function			
Location			
Has machine/equipment been modified? <input type="radio"/> Yes <input type="radio"/> No			If so, when?
Was it guarded? <input type="radio"/> Yes <input type="radio"/> No			
If Yes, describe guarding and how it functions to provide element of safety desired:			
Was guarding properly:	Constructed?	<input type="radio"/> Yes	<input type="radio"/> No
	Installed?	<input type="radio"/> Yes	<input type="radio"/> No
	Adjusted?	<input type="radio"/> Yes	<input type="radio"/> No
If No to any of above, explain:			
Was there any mechanical failure?		<input type="radio"/> Yes <input type="radio"/> No	If yes, explain:
If construction related, date of contract:			
Is firm <input type="radio"/> General Contractor		<input type="radio"/> Subcontractor	
Name of other contractors			
List any weather conditions that contributed to the incident:			
<b>TRAINING</b>			
Did employee receive specific training or instructions relating to safety and health on the job being performed? <input type="radio"/> Yes <input type="radio"/> No			
Type:			
Instructed by:			
When instructed:		Length of training:	

<b>PERSONAL PROTECTIVE EQUIPMENT</b>		
Did employee use any protective equipment for the job or task performed? <input type="radio"/> Yes <input type="radio"/> No		
Type:		
Did equipment fail? <input type="radio"/> Yes <input type="radio"/> No		
If so, describe:		
<b>CORRECTIVE ACTIONS:</b>		
Were any corrective or preventive actions put into place due to the incident? <input type="radio"/> Yes <input type="radio"/> No		
If so, list them:		
<b>Action Taken</b>	<b>Expected Result</b>	<b>Expected Completion Date</b>
Were corrective actions followed through to completion? <input type="radio"/> Yes <input type="radio"/> No		
If so, list results and dates:		
<b>Action Taken</b>	<b>Expected Result</b>	<b>Expected Completion Date</b>
STATEMENTS CONCERNING ACCIDENT		
EMPLOYEE STATEMENT CONCERNING ACCIDENT		
Name	Title	Date
SUPERVISOR/EMPLOYER'S STATEMENT		
Name	Title	Date
WITNESS STATEMENT		
Name	Title	Date
SAFETY COMMITTEE COMMENTS		
Name	Title	Date
ATTACH ADDITIONAL COMMENTS, REPORTS AND PHOTOS ON NEXT PAGE		

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# TRAINING ATTENDANCE ROSTER ACCIDENT INVESTIGATION

***Accident Investigation Training for Supervisors Includes:***

- Getting the facts
- Investigation procedures
- Interviews and statements
- Photography and Diagrams
- Corrective Actions

**INSTRUCTOR:**

**DATE:**

**LOCATION:**

NAME (Please Print)  
FIRST - MI - LAST

**SIGNATURE**

By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.

Name of Interpreter, if utilized: \_\_\_\_\_



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# TRAINING ATTENDANCE ROSTER ACCIDENT REPORTING

***Accident Reporting Training for Employees Includes:***

- Why do accidents happen
- What to report and when
- When to call for help
- Emergency Contact information

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
NAME (Please Print) FIRST - MI - LAST	SIGNATURE	
By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.		

Name of Interpreter, if utilized: \_\_\_\_\_

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**Back Safety  
in the Workplace**

## PROGRAM OVERVIEW

# **BACK SAFETY IN THE WORKPLACE PROGRAM**

**REGULATORY STANDARD:** OSHA - 29 CFR 1903. (General Duty Clause)  
OSHA - 29 CFR 1910.151 (Medical Services)  
Best Practices - Ergonomics

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### **INTRODUCTION**

Outlines the methods for identifying back disorder risk factors and for implementing protective measures to prevent back injuries.

### **TRAINING**

Recommended for most workplaces

### **ACTIVITIES**

- Identify risk factors for back injury in the operations
  - Repetitive or prolonged activities
  - Awkward postures
  - Unusual size or weight objects
- Implement any required controls to minimize or eliminate hazards.

### **FORMS**

- Training Attendance Roster, as needed

### **Table of Contents**

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# BACK SAFETY IN THE WORKPLACE PROGRAM

1. **Purpose.** This safety program is designed to establish clear company goals and objectives with regard to back safety and will be communicated to all required personnel. The company will review and evaluate this safety program:

- 1.1 When changes occur to 29 CFR that prompt revision of this document
- 1.2 When facility operational changes occur that require a revision of this document
- 1.3 When there is an accident or close-call that relates to this area of safety
- 1.4 Review the safety program any time these procedures fail

2. **Scope.** This program applies to the total workplace regardless of the number of workers employed or the number of work shifts

## 3. Responsibilities

3.1.1 Management and Supervisor:

- 3.1.1.1 Evaluate the workplace for potential back safety issues
- 3.1.1.2 Implement controls and awareness training to prevent back injuries
- 3.1.1.3 Review this program and needed.

3.1.2 Employees:

- 3.1.2.1 Follow workplace rules and procedures
- 3.1.2.2 Immediately report injuries or symptoms of back disorders

## 4. Procedure

4.1 Back Disorder Risk Factors. Identification of hazards will be based on risk factors such as conditions of a job process, workstation, or work methods that contribute to the risk of developing problems associated with back disorders. Not all of these risk factors will be present in every job containing stressors nor is the existence of one of these factors necessarily sufficient to cause a back injury. Supervisors will use the following known risk factors to isolate and report suspected problem areas:

- 4.1.1 Repetitive and/or prolonged activities
- 4.1.2 Bad body mechanics such as:
  - 4.1.2.1 Continued bending over at the waist
  - 4.1.2.2 Continued lifting from below the knuckles

- 4.1.2.3 Continued lifting above the shoulders
- 4.1.2.4 Twisting at the waist
- 4.1.2.5 Twisting at the waist while lifting
- 4.1.2.6 Lifting or moving objects of excessive weight
- 4.1.2.7 Lifting or moving object of asymmetric size
- 4.1.2.8 Prolonged sitting with poor posture
- 4.1.2.9 Lack of adjustable :
  - 4.1.2.9.1 Chairs
  - 4.1.2.9.2 Footrests
  - 4.1.2.9.3 Body supports
  - 4.1.2.9.4 Work surfaces at workstations
- 4.1.2.10 Poor grips on handles
- 4.1.2.11 Slippery footing
- 4.1.2.12 Frequency of movement
- 4.1.2.13 Duration and pace
- 4.1.2.14 Stability of load
- 4.1.2.15 Coupling of load
- 4.1.2.16 Type of grip
- 4.1.2.17 Reach distances
- 4.1.2.18 Work height

4.2 Safe Lifting Techniques. First, use a pushcart or other material-handling device! Second, ask a co-worker for help if no device is available! If you must lift alone here are some tips. Before starting to lift or carry anything, check your entire walkway to make sure your footing will be solid. Your shoes should give you good balance, support and traction. Keep loads as close to your body as possible. The following situations show basic lifting techniques to avoid injury:

- 4.2.1 Lifting or lowering from a high place
  - 4.2.1.1 Stand on a platform instead of a ladder

- 4.2.1.2 Lift the load in smaller pieces, if possible
- 4.2.1.3 Slide the load as close to yourself as possible before lifting
- 4.2.1.4 Grip firmly and slide it down
- 4.2.1.5 Get help when you need it to avoid injury
- 4.2.2 Lifting from hard-to-get-at places
  - 4.2.2.1 Get as close to the load as possible
  - 4.2.2.2 Keep back straight, stomach muscles tight
  - 4.2.2.3 Push buttocks out behind you
  - 4.2.2.4 Bend your knees
  - 4.2.2.5 Use leg, stomach, and buttock muscles to lift -- not your back
- 4.2.3 Lifting drums, barrels, and cylinders
  - 4.2.3.1 Use mechanical assists
  - 4.2.3.2 Always be aware that loads can shift
  - 4.2.3.3 Get help if load is too heavy
- 4.2.4 Awkward objects
  - 4.2.4.1 Bend your knees with feet spread
  - 4.2.4.2 Grip the top outside and bottom inside corners
  - 4.2.4.3 Use your legs to lift, keeping back straight
- 4.2.5 Shoveling
  - 4.2.5.1 Make sure your grip and balance are solid
  - 4.2.5.2 Tighten your abdomen as you lift
  - 4.2.5.3 Keep the shovel close to your body
  - 4.2.5.4 Use the strength of your thigh muscles to bring you to an upright position
  - 4.2.5.5 Increase your leverage by keeping your bottom hand low and toward the blade



#### 4.2.6 General safety tips

4.2.6.1 Don't lift objects over your head

4.2.6.2 Don't twist your body when lifting or setting an object down

4.2.6.3 Don't reach over an obstacle to lift a load

4.2.6.4 Pace yourself to avoid fatigue

### 5. Safety Information.

5.1 Job Hazard Analysis and Work Station Analysis Surveys. Job hazard analysis surveys will be routinely performed by a qualified person for jobs that put workers at risk. This analysis survey will help to verify risk factors and to determine if risk factors for a work position have been reduced or eliminated to the extent feasible.

5.1.1 Upper extremities. For upper extremities three (3) measurements of repetitiveness will be reviewed:

5.1.1.1 Total hand manipulations per cycle.

5.1.1.2 The cycle time.

5.1.1.3 The total manipulations or cycles per work shift.

5.1.2 Force measurements. Force measurements will be noted as an estimated average effort and a peak force (unless quantitative measurements are feasible). They will be recorded as "light," "moderate," or "heavy".

5.1.3 Tools. Tools will be checked for excessive vibration and weight. (The NIOSH criteria document on hand/arm vibration should be consulted.) The tools, personal protective equipment, and dimensions and adjustability of the workstation will be noted for each job hazard analysis.

5.1.4 Postures. Hand, arm, and shoulder postures and movements will be assessed for levels of risk.

5.1.5 Lifting Hazards. Workstations having tasks requiring manual materials handling will have the maximum weight-lifting values calculated. (The NIOSH *Work Practices Guide for Manual Lifting* should be used for basic calculations.)

5.1.6 Videotape Method. The use of videotape, where feasible, will be used as a method for analysis of the work process. Slow-motion videotape or equivalent visual records of workers performing their routine job tasks will be used where practical to determine the demands of the task on the worker and how each worker actually performs each task. A task analysis log/form will be used to break down the job into components that can be individually analyzed.

5.2 Hazard Prevention and Control. Company management understands that engineering solutions, where feasible, are the preferred method of control for ergonomic hazards. The focus of this safety program is to make the job fit the person, not to make the person fit the job. This is accomplished by redesigning the workstation, work methods, or tools to reduce the demands of the job. Such as high force, repetitive motion, and awkward postures. This safety program will whenever possible research into currently available controls and technology. The following examples of engineering controls will be used as models for workstation design and upgrade.

5.2.1 Workstation Design. Workstations when initially constructed or when redesigned will be adjustable in order to accommodate the person who actually works at a given workstation. It is not adequate to design for the "average" or typical worker. Workstations should be easily adjustable and either designed or selected to fit a specific task so that they are comfortable for the workers using them. The workspace should be large enough to allow for the full range of required movements especially where hand held tools are used. Examples include:

5.2.1.1 Adjustable fixtures on work tables so that the position of the work can be easily manipulated.

5.2.1.2 Workstations and delivery bins that can accommodate the heights and reach limitations of various-sized workers.

5.2.1.3 Work platforms that move up and down for various operations.

5.2.1.4 Mechanical or powered assists to eliminate the use of extreme force.

5.2.1.5 Suspension of heavy tools.

5.2.1.6 The use of diverging conveyors off of main lines so that certain activities can be performed at slower rates.

5.2.1.7 Floor mats designed to reduce trauma to the legs and back.

5.2.2 Design of Work Methods. Traditional work method analysis considers static postures and repetition rates. This will be supplemented by addressing the force levels and the hand and arm postures involved. The tasks will be altered where possible to reduce these and the other stresses. Examples of methods for the reduction of extreme and awkward postures include the following:

5.2.2.1 Enabling the worker to perform the task with two hands instead of one.

5.2.2.2 Conforming to the NIOSH *Work Practices Guide for Manual Lifting*.

- 5.2.3 Excessive force. Excessive force in any operation can result in both long-term problems for the worker and increased accident rates. Ways to reduce excessive force will be continually emphasized by first line supervisors and employees. Examples of methods to reduce excessive force include:
  - 5.2.3.1 The use of automation devices.
  - 5.2.3.2 The use of mechanical devices to aid in removing scrap from work areas.
  - 5.2.3.3 Substitution of power tools where manual tools are now in use.
  - 5.2.3.4 The use of articulated arms and counter balances suspended by overhead racks to reduce the force needed to operate and control power tools.
- 5.2.4 Repetitive motion. All efforts to reduce repetitive motion will be pursued. Examples of methods to reduce highly repetitive movements include:
  - 5.2.4.1 Increasing the number of workers performing a task.
  - 5.2.4.2 Lessening repetition by combining jobs with very short cycle times, thereby increasing cycle time. (Sometimes referred to as "job enlargement.")
  - 5.2.4.3 Using automation where appropriate.
  - 5.2.4.4 Designing or altering jobs to allow self-pacing, when feasible.
  - 5.2.4.5 Designing or altering jobs to allow sufficient rest pauses.
- 5.3 Administrative Controls. Administrative controls should be used to reduce the duration, frequency, and severity of exposures to ergonomic stressors that can cause back injury. Examples of administrative controls include the following:
  - 5.3.1 Reducing the total number of repetitions per employee by such means as decreasing production rates and limiting overtime work.
  - 5.3.2 Providing rest pauses to relieve fatigued muscle-tendon groups. The length of time needed depends on the task's overall effort and total cycle time.
  - 5.3.3 Increasing the number of employees assigned to a task to alleviate severe conditions, especially in lifting heavy objects.
  - 5.3.4 Using job rotation, with caution and as a preventive measure, not as a response to symptoms. The principle of job rotation is to alleviate physical fatigue and stress of a particular set of muscles and tendons by rotating employees among other jobs that use different muscle-tendon groups. If rotation is utilized, the job analyses must be reviewed to ensure that the same muscle-tendon groups are not used when they are rotated.

- 5.3.5 Providing sufficient numbers of standby/relief personnel to compensate for foreseeable upset conditions on the line (e.g., loss of workers).
- 5.3.6 Job enlargement. Having employees perform broader functions which reduce the stress on specific muscle groups while performing individual tasks.

## 6. Training and Information

6.1 Types of training. Supervisors will determine whether training required for specific jobs will be conducted in a classroom or on-the-job. The degree of training provided shall be determined by the complexity of the job and the associated hazards.

6.1.1 Initial Training. Prior to job assignment the company shall provide training to ensure that the hazards associated with pre-designated job skills are understood by employees, including the knowledge and skills required for the safe application and usage of work place procedures and equipment is acquired by all employees. The training shall include the following:

6.1.1.1 Each affected employee shall receive training in the recognition of back injury hazards involved with a particular job, and the methods and means necessary for safe work.

6.1.1.2 Training course content. All new and current workers, who work in areas where there is reasonable likelihood of back injury, will be kept informed through continuing education programs. Initial and refresher training will, as a minimum, cover the following:

6.1.1.2.1 Back hazards associated with the job.

6.1.1.2.2 Lifting techniques.

6.1.1.2.3 Potential health effects of back injury.

6.1.1.2.4 Back injury precautions.

6.1.1.2.5 Proper use of protective clothing and equipment.

6.1.1.2.6 Use of engineering controls.

6.1.1.3 Responsibility. Employees are responsible for following proper work practices and control procedures to help protect their health and provide for the safety of themselves and fellow employees, including instructions to immediately report to the Supervisor any significant back injury.

6.1.2 Refresher Training. Scheduled refresher training will be conducted on an as needed basis.

6.1.2.1 Retraining shall be provided for all authorized and affected employees whenever there is a change in their job assignments, a change in equipment or processes that present a new hazard, or when their work takes them into other hazard areas.

6.1.2.2 Additional retraining shall also be conducted whenever a periodic inspection reveals, or when there is reason to believe that there are deviations from or inadequacies in the employee's knowledge of known hazards and use of equipment or procedures.

6.1.2.3 The retraining shall reestablish employee proficiency and introduce new equipment, new lifting procedures or revised control methods and procedures.

6.1.3 Verification. The company shall verify that employee training has been accomplished and is being kept up to date. The verification shall contain a synopsis of the training conducted, each employee's name, and dates of training.

6.2 New Employee Acclimatization Period. Supervisors will ensure that new or transferred employees are allowed an appropriate acclimatization period. New and returning employees will be gradually integrated into a full work schedule as appropriate for specific jobs and individuals. Employees will be assigned to an experienced trainer for job training and evaluation during this period. Employees reassigned to new jobs should also have an acclimatization period.

## 7. Definitions.

➤ *None at this time*

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# TRAINING ATTENDANCE ROSTER BACK SAFETY

***Back Safety Training Includes:***

- Types of Injuries and Causes
- Risk Assessment and Planning
- Safe Lifting Techniques
- Special Lifting Hazards

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
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NAME (Please Print) FIRST - MI - LAST	SIGNATURE
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By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized:  
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## PROGRAM OVERVIEW

# **BLOOD AND BODILY FLUID INCIDENTAL EXPOSURE PROGRAM**

REGULATORY STANDARD: OSHA - 29 CFR 1910.1030 (LIMITED REFERENCES)

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## **INTRODUCTION**

Exposure to another person's blood or bodily fluids can potentially place your health at risk. Contracting diseases such as the Human Immunodeficiency (HIV) and Hepatitis B (HBV) viruses is unlikely, but possible, in the performance of emergency first-aid, housekeeping and janitorial staff duties, and similar tasks. This program outlines the protective measures that can be taken during potential exposure situations and training that can be provided to reduce or eliminate these types of exposures.

## **TRAINING**

Recommended for employees who may encounter human blood or body fluids but such exposure is not a part of their normal job duties.

## **ACTIVITIES**

- Identify risk situations
- Train employees, as appropriate

## **FORMS**

- Training Attendance Roster, as needed

## **Table of Contents**

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# Incidental Blood and Bodily Fluid Exposure Program

1. **Purpose.** Where employees can be exposed (through injury or illness in the workplace) to the blood and/or bodily fluid of another person, information and training in the potential health effects of such exposures may be provided. This procedure assists in compliance with implementing this type of “incidental” Bloodborne Pathogen Exposure program and references Federal Regulation 29CFR1910.1030.
2. **Scope.** Applies to all locations within company buildings or facilities where incidents involving exposures to a person’s blood or bodily fluids may occur.
3. **Responsibilities**
  - 3.1 Management and Supervisor:
    - 3.1.1 Determine where exposures are present
    - 3.1.2 Ensure employees are trained, based on their level of exposure to blood or Bloodborne pathogens
    - 3.1.3 Implement bio-safety controls, where required
    - 3.1.4 Maintain appropriate documentation (including exposure incident reports and post-exposure follow up records)
  - 3.2 Employees:
    - 3.2.1 Follow established written procedures
    - 3.2.2 Attend training, as needed or required
4. **Procedure**
  - 4.1 Determine where exposures or potential exposures exist
  - 4.2 Provide controls to eliminate or reduce exposures
  - 4.3 Document exposures through accident/incident reports or exposure incident reports and maintain records for 5 years.
5. **Safety Information**
  - 5.1 Document and maintain written processes and procedures in work areas where exposure could potentially occur. This includes:
    - 5.1.1 Any first aid procedures or supplies maintained at the company
    - 5.1.2 PPE (Personal Protective Equipment) that may be used or required
    - 5.1.3 Training provided, as needed

- 5.2 Assure a system is in place for a medical evaluation for any exposed employee who has had contact with the blood or bodily fluids of another person.
- 5.3 Assure incident and/or exposure records are maintained for 5 years for each employee who has an exposure event. Record all exposure incident cases on the OSHA 300 log, if your company is required to maintain such records
- 5.4 These records or reports should include:
  - 5.4.1 Name of the exposed employee
  - 5.4.2 Information (if known) on if the exposed employee has had a Hepatitis B Vaccination previous to the exposure.
  - 5.4.3 Circumstances of the exposure and any PPE used
    - 5.4.3.1 Written opinion of the healthcare provider (PLHCP Statement) and copies of any other documentation provided to the healthcare professional responsible for post-exposure follow up.

## 6. Training and Information

- 6.1 Training for employees is voluntary and not required.
- 6.2 Training includes:
  - 6.2.1 Information on how bloodborne pathogens and diseases can be contracted by employees during their work.
  - 6.2.2 How exposures are prevented (controls used, PPE, etc.)
  - 6.2.3 Whom to contact at the company and what to do (and what to expect) if an employee has an exposure.
  - 6.2.4 Training records should be maintained for at least 3 years.

## 7. Definitions

- *Biohazards/Bloodborne Pathogens* - Infectious agents (human pathogens), materials from human sources or primates that may contain pathogens, and organism-produced toxins, venom, allergens, etc. that causes disease in humans.
- *Contact or Exposure* – Blood or body fluids must have the potential to be absorbed into the blood stream (such as through a break in the skin (cut or other skin opening) or through the eyes, nose, mouth to be considered contact. Exposure is considered to be any contact with another person’s blood or bodily fluids (saliva, vomit, urine, feces, etc).

- *Exposure Control Program* - A written program that outlines the exposures that are present (or potentially present) in the workplace and the steps taken to eliminate or control those exposures.
- *OPIM* - Other Potentially Infectious Materials, such as contaminated waste, tissue samples, Human body fluids, including: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, saliva in dental procedures, any body fluid that is visibly contaminated with blood, and all body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids.
- *Potentially Exposed* - An exposure that can reasonably occur at some time.
- *Sharps* - a non-needle sharp or needle device used for withdrawing blood or body fluids, accessing a vein or artery or administering medication or other fluids.
- *Universal Precautions* - An approach to infection control. According to the concept of universal precautions, all human blood and certain human body fluids are treated as if known to be infectious for HIV, HBV, and other bloodborne pathogens.

## BLOOD AND BODILY FLUIDS (INCIDENTAL) EXPOSURE TRAINING ATTENDANCE ROSTER

<b>Training Content:</b> <ul style="list-style-type: none"> <li>What is a BBP</li> <li>Types of diseases</li> <li>Precautions and PPE</li> <li>Spill Cleanup</li> <li>Waste Disposal</li> <li>Exposure Incident Process</li> </ul>	<b>Instructor Name:</b>	<b>Date of Training:</b>
<b>NAME (Please Print) FIRST - MI - LAST</b>	<b>SIGNATURE</b>	<b>JOB TITLE</b>
By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.		

Name of Interpreter, if utilized: \_\_\_\_\_

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## PROGRAM OVERVIEW

# **ELECTRICAL (COMPREHENSIVE) SAFETY PROGRAM**

REGULATORY STANDARD: OSHA - 29 CFR 1910.331 - 335

OSHA - 29 CFR 1926.302, 1926.416-417

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## **INTRODUCTION**

This program is designed to assist the company to ensure that work practices performed on or near electrical equipment and energy sources are evaluated to determine if proper safety precautions are implemented. This program applies to all employees and contractors of the company who are exposed to live electrical energy at levels of >50V and less than 240V that cannot be locked out and de-energized. It outlines employee training, work practices, equipment use and details the safeguards for personal protection.

## **TRAINING**

- Employees exposed to hazards >50V must be trained and understand the magnitude of the hazard and the protective measures and controls used
- Employees exposed to higher voltages (>110V) must be qualified and have appropriate licenses or documented training.
- Employees exposed to high voltage (>240V) must be licensed electricians or otherwise specifically qualified, and use arc-flash protective gear. (Note that this program does not review the requirements for this level of exposure).
- Welders must be trained in electrical safety, regardless of the voltage encountered
- Specialized equipment (high voltage, CDT, etc.) may require additional training or restrictions put into place to limit exposures

## **ACTIVITIES**

- Review hazards and determine level of exposures
- Provide testing supplies and safety equipment
- Run electrical systems to reduce the use of extension cords to truly temporary use
- Provide warning and alerting devices to protect employees from contact with energy hazards
- Write and communicate policies and procedures

## **FORMS**

- Electrical Written Program
- Training Attendance Roster

## Table of Contents

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# ELECTRICAL (COMPREHENSIVE) SAFETY PROGRAM

**1. Purpose.** This program outlines the processes to protect employees in their workplaces from hazards associated with live electrical energy. These processes may include, but are not limited to the following:

- 1.1. Design of electrical systems, electrical utilization equipment, and installations Safety related work practices
- 1.2. Safety related maintenance requirements
- 1.3. Safety requirements for special equipment and processes
- 1.4. Additionally, any contractors that will perform electrical work at the company will be required to have an Electrical Safety Program in place.

**2. Scope.** This program applies to all employees and contractors at the company who are exposed to live electrical energy at levels of >50V.

## **3. Responsibilities**

### 3.1 Management

- 3.1.1 Ensure a written program is in place appropriate to the hazards. This program considers voltage, energy level, circuit conditions, and the identification of any electrical safety controls
- 3.1.2 Ensure any modifications to existing equipment meet Electrical Safety Standards
- 3.1.3 Ensure installations of new equipment are assessed or inspected to assure they meet the electrical safety standard requirements.
- 3.1.4 Review the written program at least annually to assure it remains accurate and applicable.
- 3.1.5 Assure employees who work on live electrical equipment or components, or who are exposed to electrical hazards are “qualified” under the requirements of the standard and appropriately trained, based on the risks presented.
- 3.1.6 Ensure all contractors who work with electrical parts, components or hazards have a written Electrical Safety Program in place, prior to their beginning work.
- 3.1.7 Provide Electrical Personal Protective Equipment to the employees, as needed.

### 3.2 Engineering and Design or Purchasing

- 3.2.1 Ensure any modifications to existing equipment meet Electrical Safety Standards
- 3.2.2 Ensure installations of new equipment are assessed or inspected to assure they meet the electrical safety standard requirements.
- 3.2.3 Ensure all contractors who work with electrical parts, components or hazards have a written Electrical Safety Program in place, prior to their beginning work.

### 3.3 Contractors

- 3.2.1 Provide the company with a copy of their written Electrical Safety Program and/or employee training records, upon request.

## 4 Procedure.

4.1 There may be conditions where voltages less than 50 volts may require an Electrical Safety Program. These would include, but are not limited to, conditions where electrical burns, explosion due to electric arcs, or low voltage, high current systems require safe work practices.

4.2 Selection and Use of Work Practices. Work practices are designed to prevent shock and other injuries from either direct or indirect contact with live electrical parts and energy.

4.2.1 Live parts (>50V) must be de-energized (Lockout/Tagout) before employees work on them, unless it is demonstrated that additional or increased hazards are introduced, or where de-energizing is infeasible due to design or operational limitations. In such cases a specific and detailed procedure will be in writing and followed for the energy control of that operation. The detailed procedure must include:

- Statement of intention
- Specific steps to shut down, isolate, block and secure machine or equipment
- Procedures for placement, removal and transfer of devices
- Specific responsibilities for devices
- Requirements for equipment testing and verify effectiveness of measures

4.2.2 In all cases overhead power lines must be de-energized if there is a possibility of contact with them by any part of the body, tool or equipment that could create a conduit of energy through the person or equipment.

- If “unqualified” persons must work underneath or near energized lines, they must be located far enough away from the line so that any tool or equipment used cannot contact the line. At a minimum, the distances must be 10 feet for 50kV or less and an additional 4 inches for every additional 10kV of power over 50kV. Minimum approach distance is 20 feet, if the power level in the line is unknown.

- “Qualified” persons may not approach or take un-insulated conductive objects (including lift equipment) any closer to overhead lines than the following:

**Table 2**

<b>Voltage Range</b>	<b>Minimum Distance</b>
300V and less	Contact should be avoided
300-750V	1 foot
750-2kV	1 foot 6 inches
2kV-15kV	2 feet
15kV-37kV	3 feet
37kV-87.5kV	3 feet 6 inches
87.5kV-121kV	4 feet
121kV-140kV	4 feet 6 inches

- If the employees are within approach distances, they must still be insulated by protective equipment (i.e. arc flash gear) or equivalent protective materials.
  - Elevated equipment (or equipment capable of being elevated) must maintain a clearance of at least 10 feet from overhead lines. Vehicles in transit with their structures lowered to their lowest level may reduce the clearance to 4 feet (plus 4 inches for every additional 10kV over 50kV). Insulated barriers, if used, must protect from the voltage that may be encountered. Aerial lifts used by “qualified” persons for work on overhead lines may have clearances reduced to the distances in Table 2 (above).
  - Employees on the ground may not have contact with such equipment or any of its attachments unless they are insulated or the approach distances of the equipment are limited to those outlined in the table above.
  - Where equipment is intentionally grounded because of potential contact, areas must be barricaded for a minimum 10 ft. radius.
- 4.2.3 Illumination and light must be provided to enable the employees to work safely. Blind reaching into a part, panel, equipment or circuitry system is prohibited.
- 4.2.4 Confined-space electrical work must utilize shields, barriers or insulating materials to avoid inadvertent contact with live energy sources and parts. Doors, panels, etc. must be secured.
- 4.2.5 Any conductive material must be handled in a manner that prevents contact with energized parts and materials. Procedures and work practices may need to be implemented when long-dimension objects (e.g. tree trimming poles) are used or handled in such areas.
- 4.2.6 Jewelry and similar clothing items (e.g. scarves) must be covered or removed, if contact with energized parts is possible.

4.2.7 Housekeeping duties should not be performed near live parts without additional precautions put into place. De-energizing should take place to prevent inadvertent contact with energized parts by “un-qualified” people.

4.2.8 Interlocks may not be defeated unless it is done by a “qualified” person.

## 5 Safety Information

### 5.1 General

5.1.1 Qualified Employees - Only “Qualified” individuals are allowed to work on or near energized equipment.

5.1.2 Policies or Procedures – Written electrical policies or procedures are established to ensure that electrical products, wiring, and devices are designed, installed, maintained, and utilized safely. Safe work practices and procedures are written and followed for regularly conducted tasks related to electrical exposures.

5.1.3 Level of Exposure - Hazard/Risk analyses are performed prior to any task. The work area is assessed to determine the level of exposure, requirements of the task and the corresponding risk to employees from any exposed energized parts or equipment.

5.1.4 Non-routine Tasks - Perform non-routine or emergency work only under the direction of qualified personnel, or after a thorough hazard/risk analysis (such as Job Hazard Analysis) of existing conditions. Write procedures, as required. Utilize Lock-Out/Tag-Out (LOTO) procedures, as required.

5.1.5 Medical and First aid - First aid kits must be maintained. When doing field work at least two people with 1st aid and CPR must be available, if more than 4 minute response – all employees must be trained.

### 5.2 Safety Related Work Practices

5.2.1 Each person is expected to work within the limits of their expertise and training and follow established practices, which are developed according to the hazards and tasks performed. Examples are:

- Do not leave exposed electrical hazards unattended
- Replace covers or protect energized components from inadvertent contact

5.2.2 Utilize proper insulation and/or protective equipment and proper tools corresponding to the level of exposure.

5.2.3 Safety related work practices must be implemented for both qualified and non-qualified persons working with or near energized parts, materials, equipment or sources. This includes premises wiring, wiring from a connection to a supply, other types of wiring and installation of optical fiber cable when cables are run in the same conduit, raceway (or equivalent system) with any live electrical wiring.

- 5.2.4 Power generation, transmission and distribution work performed by qualified persons are exempted from this section. Additionally, work in vehicles (ships, watercraft, railways, aircraft and RVs) when such work is for signaling or communications equipment is also exempt.
- 5.2.5 Ladders must be secured to prevent them from being dislodged when live energy at any voltage. Where unqualified persons can access, ladders must be kept minimum of 10 feet away from live energized lines at 50KV or less, (at higher V add 4 inches for every 10KV).
- 5.2.6 Toolbox talks, job briefings, and contractor communication must be provided each day, covering:
- Routine work - Hazards, procedures, precautions, controls, PPE
  - Complicated work – hazards, recognition of conditions
  - Work rules must be communicated and activities discussed to ensure employee and contractor safety is not compromised.

### 5.3 Use of Equipment

- 5.3.1 Visual inspection must occur before use. Inspection includes looking for loose parts, deformed pins, and damage to the jacket or insulation. If equipment remains in place, it does not require inspection unless it is relocated or impacted.
- 5.3.2 Damaged equipment must be repaired or replaced prior to use. Repairs may require testing to assure electrical continuity and safety.
- 5.3.3 Flexible cords for equipment requiring grounding must contain a grounding connector. The plugs may not be altered or changed to allow insertion into a non-grounded receptacle.
- 5.3.4 Highly conductive environments (wet or damp locations or hazardous atmospheres) must use only equipment approved for that environment (specifically GFCI or equivalent). Employees must not plug equipment in to receptacles in such locations if their hands are wet and equipment is energized. Insulating materials may be required when electrical energy can be conducted through the hands or fingers.
- 5.3.5 Locking connectors must be secured after connection, where required.
- 5.3.6 Power and Lighting Circuits must use the switches, breakers or disconnects to open, reverse or close circuits when live energy is present. Cable connectors not specifically designed for this purpose may not be used, unless it is an emergency. After de-energizing, circuits may not be manually re-energized until it has been determined that it can be accomplished safely (overloads rather than fault conditions are exempt from this requirement). Over-current protection may *not* be modified.

5.3.7 Test equipment may be used only by a “qualified” person. Visual inspection of the test equipment must take place before each use. If defects or damage is found, it must be removed from service until repaired or replaced. Test equipment (and their accessories) must be designed and rated for the level of energy they will be testing for.

5.3.8 Where flammable or ignitable vapors, gases or dusts are present at any time electrical equipment capable of igniting these materials may not be used.

#### 5.4 Safeguards for Personal Protection:

5.4.1 PPE (Personal Protective Equipment) appropriate to the level of electrical hazard that may be encountered must be provided and used. PPE must be maintained in a safe and reliable condition. It must be inspected or tested periodically. If the insulating capability of protective equipment could be damaged during use the insulating material must be protected (i.e. outer leather gloves over insulated inner gloves).

5.4.2 Non-conductive head protection must be provided if head injury is possible from contact with electrical circuits or conductors.

5.4.3 Eye or face protection is required when arcs or flashes may occur or if electrical explosion could create flying objects.

5.4.4 Fall protection is required for qualified persons at 4 feet for live electrical work, or for any pole or tower work. Positioning straps must pass electrical tests and flammability tests, and must be limited to 2 feet fall distance. Lanyard strength must be adjusted upward if employee weight is >310 lbs.

5.5 Insulated tools and equipment are used when contact with live energy is possible. If the insulating capability of tools and equipment could be damaged during use the insulating material must be protected.

5.5.1 Fuse removal tools must be rated for the circuit voltage

5.5.2 Ropes and hand-lines must be non-conductive

5.5.3 Protective shields will be put in place or used to prevent contact with live parts or energized materials. “Non-qualified” persons must be suitably protected during service or repair from contact with live electrical energy or energy hazards.

5.5.4 Hydraulic and pneumatic tools must be rated for electrical if potential to contact live circuitry, and protect against loss of insulating value (as hydraulics can create a vacuum in the line).

5.5.5 Live line tools must be wiped down and inspected each day before use.

5.5.6 Live line tools must be removed from service every 2 years and either replaced or tested to ensure integrity.

- 5.6 Generators may only supply equipment located on the generator or directly through receptacles mounted on the generator. Generators mounted on vehicles must be bonded to vehicle frame.
- 5.7 Warning and alerting devices, such as signs, tags symbols, barricades or attendants will be used to protect employees from contact with energy hazards. Barricades must be used in conjunction with signs when access to a work area must be restricted. Where such barricades do not provide sufficient protection, attendants will be posted.

## 6 Training and Information

- 6.1 All employees with exposures will receive general electrical safety awareness training
- 6.2 “Qualified” individuals will have appropriate licenses or documented training
- 6.3 Employees exposed to 50 volts or more to ground (and their first-line supervisors) require additional training that is commensurate with the risk encountered
- 6.4 Welders must be trained, regardless of the voltage they may encounter
- 6.5 Training must be classroom or on-the-job and the degree of training must be commensurate with the risk to the employee. Training includes:
  - 6.5.1 The content of the portions of the electrical safety standard that applies to the work
  - 6.5.2 Safety related work practice required for the respective job or task
- 6.6 Additional requirements for unqualified persons that are necessary for their safety, including methods to recognize energized from non-energized parts, how to determine nominal voltage of exposed live parts and the clearance distances.

## 7. Definitions.

- *Conductor* - A wire or other conduit that conducts electricity
- *De-energized* - Free from any electrical connection to an energy source
- *Designs Electrical Systems and Equipment* - Engineers or other technical professionals responsible for implementing design safety standards for electrical equipment.
- *Electrical Personal Protective Equipment and Devices* - Protective equipment that is specifically designed to protect individuals from shock, arc blast, arc flash, etc.
- *Electrical Safety Program* - The program that directs activity appropriate for the voltage, energy level, and circuit conditions, and include safety-related work practices.
- *Energized* - Electrically connected to an energy source.



- *Over-Current Protection* - A device that protects equipment or conductors from current in excess of the rating for the equipment or conductors.
- *Qualified Person* - A person trained and knowledgeable to recognize and avoid electrical hazards of equipment or a specific work method.
- *Safety Related Work Practices* - Methods that are consistent with the nature and extent of electrical hazards that are meant to safeguard employees from injury while working on or near exposed electric conductors or circuit parts that are (or can become) energized.
- *Un-Qualified Person* - An individual that is not permitted to work on electrical equipment because they do not have the necessary skills and/or training to perform the work safely.

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# ELECTRICAL SAFETY WRITTEN PROGRAM ( \_\_\_\_\_ )

This procedure identifies the Electrical Safety Program that is in place covering all electrical work performed by the company. This procedure provides overall program guidance and should be used in conjunction with all procedures and practices employed by the company to help insure electrical equipment and electrical work is accomplished safely.

**Philosophy:** *Achieve and reinforce a zero incident philosophy through prudent equipment design and installations, and safe electrical work practices.*

All employees within The company shall follow the electrical safety procedures and other directives set forth by the company.

It is the company's responsibility to insure that only *qualified* individuals work on or near energized electrical equipment. It shall be further required that *non-qualified* individuals who work on electrical equipment be trained and understand the limits placed on them while working on this equipment. It is further required that all *non-qualified* individuals are protected from inadvertent contact with energized components.

- **Personal Responsibility** - Each person should be responsible for his or her own safety and for the safety of others. Each person is expected to correct or report unsafe conditions or acts that are observed. Each person is expected to know, understand, and use applicable safety procedures and work instructions as tools to guide all tasks. Each person shall use the approved tools and personal protective equipment as required for the job.
- **Qualified Person** – Each qualified person shall demonstrate, through training or education, the required technical skills to perform their job responsibilities safely. The qualified person shall be knowledgeable in the use of electrical safe work practices, and the proper selection and use of Personal Protective Equipment (PPE).
- **Supervisory Responsibility** – Each Supervisor must set an example by demonstrating the proper attitude and behavior toward safety. The Supervisor's conduct is reflected in the conduct of those he or she supervises. Each Supervisor should empower the people under his or her direction to be proactive in continuously improving their own safety and the safety of others. Each Supervisor shall insure that the people under his or her direction have the necessary knowledge and skills to complete assigned tasks safely.
- **Management Responsibility** – Personal Protective Equipment and other associated equipment and tools are provided to employees working on electrical equipment. Each manager shall provide the required resources to insure that employees and Supervisors receive the required training as directed by prudent electrical safety practices. Each manager shall insure that only recommended tools, instruments and Personal Protective Equipment be used when working on electrical equipment.
  - Managers should designate a technically competent qualified person to advise them in the development, implementation and maintenance of electrical safe work practices.

**Program Principles.** The company Electrical Safety Program shall include the following principles, but are not limited to:

- Inspection/evaluation of electrical equipment
- Maintain the electrical equipment's insulation and enclosure integrity
- Plan every job and document first time procedures
- Deenergize, if possible
- Anticipate unexpected events
- Identify and minimize the hazard
- Protect the employee from shock, burn, and blast and other hazards that are due to the working environment.
- Use the right tools for the job.
- Assess peoples abilities
- Auditing these principles

**Program Controls.** The company has established the following controls to insure electrical safety. These controls may include, but are not limited to:

- **Shut Down Energy Source (Deenergized).** No work shall be conducted where exposures to hazards associated with electrical energy exists until an attempt is first made to shut down the source of energy.
- **Parts Are Considered Energized Until Proven Otherwise.** Every electrical conductor or circuit part is considered energized until proven otherwise.
- **No Barehanded Contact.** No bare-hand contact is to be made with exposed energized electrical conductors or circuit parts.
- **Deenergizing Is a Dangerous/Hazardous Task.** De-energizing an electrical conductor or circuit part and making it safe to work on, can itself be a potentially hazardous task.
- **Development of Procedures.** Procedures shall be developed relevant to the equipment, hazards and operations. This will include training so employees can apply them to accomplish each task.
  - Use procedures as “tools” to identify the hazards and develop plans to eliminate/control the hazards.
- **Qualified Employees.** Employees will be qualified for the task to which they are assigned.
  - Train employees to qualify them for working in an environment influenced by the presence of electrical energy.
- **Hazard/Risk Analysis.** A hazard/risk analysis will be performed for each task involving any approach to energized conductors and/or circuit paths.
- **Overall Safety Environment.** The overall safety environment will be considered when working on electrical equipment (e.g., clearances, illumination, working on elevated areas, etc.). Identify and use precautions appropriate to the working environment.
- **Safety Discussions.** Affected groups will hold periodic safety discussions to reinforce safety procedures and heighten awareness. Annually a safety stand down may be held to further emphasis issues, training and incidents.
- **Job Plan; Hazards and Procedures.** Each non routine job or one that does not have an established procedure will require a *Job Plan or Job Hazard Analysis*. Each Job Plan will include a discussion of existing hazards and the procedures appropriate for the tasks involved in the job.

## Training.

- All qualified persons in the company are expected to meet the training requirements that include information and experience relating to electrical hazards and electrical safe work practices.
- Employees will be provided with electrical safety awareness training, as appropriate and electricians will have licenses and/or appropriate training.

## Policies.

- **Standards Policy.** Equipment shall be properly labeled and identified. As conditions change or revisions are made, equipment identification must be updated.
- **As-Built Documentation Policy (Change Management).** Drawings used in planning electrical work must reflect the current condition of equipment and installations, single-line diagrams, process and instrument (P&I) diagrams, schematics, and underground drawings must all be up-to-date so that proper planning can take place. In addition, up-to-date drawings help to identify potential hazards. Inaccurate drawings can compromise the safe execution of an electrical task, no matter how well planned the task might be. These drawings shall be maintained in an up-to-date condition. As-built changes shall be recorded, and file copies shall be changed appropriately.
- **Evaluation, Installation and Use of Equipment.**
  - Approval. The conductors and equipment required shall be acceptable only if approved and listed by Nationally Recognized Testing Laboratory
  - Hazards. Electrical equipment shall:
    - Be free from recognized hazards that are likely to cause serious injury to employees.
    - Be suitable for installation; conform to codes, listings or labeling for its intended purpose.
    - Be installed in accordance with any manufacturer's instructions.
    - Have identification of any disconnecting means and circuits
    - Have required working space around the equipment
    - Have required illumination of the work space
    - Provide for the guarding of live parts
    - Be in compliance with other consensus standards (ANSI, NFPA, IEC)
  - Installation of large equipment or processes shall be approved as appropriate by a recognized inspection process, and may include certification from municipal or public inspectors.
- **Abandoned Lines, Wires, or Cables.** Electrical lines, wires, and cables that are removed from service or not connected should be removed. If removal is not feasible they must be de-energized, taped and then tagged, to indicate the location of the other end. Underground wiring abandoned in place must be maintained in drawings for reference and so indicated on the drawing. Temporary wiring installed to provide power during construction must be removed when no longer required.
- **Excavation Policy.** A thorough investigation must be conducted prior to beginning any excavation work. The investigation includes examining drawings, receiving information from utility or municipal resources, and inspecting the area with devices that can detect underground obstacles. The utility and service companies **must** authorize or provide information on underground services prior to the beginning of work.

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# TRAINING ATTENDANCE ROSTER ELECTRICAL SAFETY

***Electrical Safety Training Includes:***

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<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
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NAME (Please Print) FIRST - MI - LAST	SIGNATURE
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By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized: \_\_\_\_\_

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**Emergency Action,  
Evacuation, and Fire  
Prevention**

## PROGRAM OVERVIEW

# EMERGENCY ACTION, EVACUATION AND FIRE PREVENTION SAFETY PROGRAM

REGULATORY STANDARD: OSHA - 29CFR1910.36, .38, .157, .165  
NFPA-10

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## **INTRODUCTION**

This program is intended to assist in establishing requirements to ensure that fire and other potential emergency situations are evaluated, and safety procedures implemented.

## **TRAINING**

- All employees and supervisors will be trained in emergency actions and their responsibilities including how emergencies are communicated. Training is required initially, and as changes to the workplace, program or employee responsibilities occur
- Conduct drills, if required
- Emergency Response Team members must be trained based on the types of emergencies they will be expected to encounter. Fire fighting techniques, first aid treatment or both may be required, depending upon the duties and responsibilities of the team
- Employees designated to use fire extinguisher users must be trained annually in the general principles of fire extinguisher use and the hazards involved in incipient (beginning) stage fire fighting

## **ACTIVITIES**

- Identify and evaluate fire hazards
- Identify and evaluate exit routes
- Identify fire wardens and response teams and define responsibilities, if applicable
- Provide emergency equipment as needed
- Write and communicate policies and procedures including Emergency Action and Fire Prevention Programs

## **FORMS**

- Emergency Action Plan
- Fire Drill or Evacuation Assessment
- Training Attendance Roster – Emergency Action
- Training Attendance Roster – Fire Extinguisher

## Table of Contents

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# EMERGENCY ACTION, EVACUATION AND FIRE PREVENTION SAFETY PROGRAM

1. **Purpose.** This program outlines the requirements for the Emergency Action and Evacuation Program in the workplace. It is a federal requirement that all companies have Emergency Action Plans (plans must be in writing for companies with more than 10 employees).
2. **Scope.** This program applies to all workplaces, facilities, and sites at the company.
3. **Responsibilities**
  - 3.1 Management
    - 3.1.1 Determine flight or fight response for the company (i.e. will all employees evacuate during fire or spill emergencies, or will some employees be required as part of their job duties to fight a fire, contain a spill or provide medical treatment).
    - 3.1.2 Write Emergency Action Plan (EAP), including specific procedures or responsibilities for employees and wardens.
    - 3.1.3 Communicate programs to employees and staff.
    - 3.1.4 Ensure evacuation alarm systems and notifications are in place and are distinctive and consistent throughout the site. It is recommended that evacuation programs be periodically tested through physical drills (partial evacuation drills and/or full evacuation drills) or via table-top drills or discussions.
    - 3.1.5 Ensure all employees are appropriately trained to the responsibilities they are expected to take during an emergency situation, including how to report a fire or other emergency and what to do during an evacuation.
    - 3.1.6 If evacuation wardens are designated and trained, it is recommended that there be a ratio of at least one warden for every 20 employees.
    - 3.1.7 Ensure that fire extinguishers (if located on-site) are inspected, maintained, tested and of the proper size and type for the area hazards. If employees are expected to use them, annual training is required.
    - 3.1.8 If utilized, provide on-site emergency response teams with appropriate equipment and training to perform their expected duties. Maintain training documentation for response team members, and documentation for equipment inspection and maintenance.
    - 3.1.9 Inspect Fire Doors annually and keep all fire doors closed. If they must be held open due to production or operation-specific requirements, they must be fitted with automated releases in accordance with state building codes. Maintain documentation for the life of the fire door.

## 3.2 Employees

3.2.1 Attend initial training, and refresher training as required.

3.2.2 Evacuate, or perform expected tasks prior to evacuation, during an emergency.

## 3.3 Wardens (evacuation assistance as appropriate or designated)

3.3.1 Attend appropriate training.

3.3.2 Follow established procedures to assist in the safe and orderly evacuation of employees.

3.3.3 Report either the all-clear or problems to the incident commander or other designated person at the command post.

## 3.4 On-site Response Teams (as appropriate or designated)

3.4.1 Provide emergency response to fires, spills or medical emergencies, as designated.

3.4.2 Attend appropriate training to maintain appropriate certifications.

3.4.3 Ensure emergency response equipment is functioning and adequate to the response(s) required.

## 4. Procedure.

### 4.1 Emergency Action Plan

4.1.1 May be combined with Fire Prevention Plan, if required, into one document that serves both purposes.

4.1.2 Must be in writing, kept at the workplace and available for employees to review. Companies with 10 or fewer employees may communicate the program orally, rather than in writing.

4.1.3 Programs must include:

4.1.3.1 Procedures for reporting a fire or other emergency.

4.1.3.2 Procedures for emergency evacuation, including types of evacuations and assigned evacuation routes. (Posted, color coded evacuation route maps are highly recommended for each area of the building or structure.)

- 4.1.3.3 Procedures to be followed by employees who remain to operate or shut down critical operations before they evacuate (power systems, water supplies, ammonia tanks, chemical processes that must be shut down in sequence, etc.).
- 4.1.3.4 Procedures assigned areas and responsibilities of evacuation wardens, if utilized.
- 4.1.3.5 Procedures to account for all employees after evacuation.
- 4.1.3.6 Procedures to be followed by employees who perform rescue or medical duties (on-site response teams).
- 4.1.3.7 The name or job title of the person(s) who may be contacted by employees who need more information about the program, or an explanation of their duties and responsibilities under the program.
- 4.1.4 An alarm system must be maintained, if present. The system must have a distinctive signal for each type of alarm (i.e. evacuation alarms must sound the same throughout the site).
- 4.1.5 Wardens (or evacuation assistance) must be designated and properly trained to assist in a safe and orderly evacuation of other employees.
- 4.1.6 Programs should address the types of emergencies that are reasonably likely to occur (fire, chemical spills, severe weather, etc.).

## 4.2 Evacuation and Notification

- 4.2.1 Alarms and Signals to notify employees of an emergency evacuation are distinctive in sound and consistent throughout the site.
  - 4.2.1.1 Alarms may be automatic or verbally provided in person or through a public address system, but they must be able to be understood by all employees.
  - 4.2.1.2 The same sound or wording must be used throughout the site.
  - 4.2.1.3 Employees must be trained or informed of the sounds or wording used.
- 4.2.2 Evacuation Routes will be established for each area of the building or site.
  - 4.2.2.1 Employees will be trained and informed of their work-area route.
  - 4.2.2.2 It is highly recommended that maps be posted at each area of the building to assist employees and others in determining their evacuation routes. Maps should be color coded, with the evacuation route in red.

- 4.2.2.3 Off-site job locations will have evacuation routes determined and communicated to employees who work at these off-site locations.
- 4.2.3 Relocation Points will be established for employees to congregate during an evacuation. Designated relocation points assist in assuring that all employees are accounted for.
  - 4.2.3.1 Employees will be trained in their respective relocation point during initial (or refresher) training.
  - 4.2.3.2 Supervisors or other specifically designated people at each relocation point will be responsible for assuring that all employees have been accounted for.
    - An accounting for the relocation point will be made to the incident commander or other designated person at the command post.
  - 4.2.3.3 Off-site job locations will have relocation points determined and communicated to employees who work at these off-site locations before the job commences or the employee reports to the site.
  - 4.2.3.4 Where appropriate, severe weather relocation points (shelters or arrangements with neighboring facilities) will be communicated to employees during the training.
- 4.2.4 Return to Work Signals will be provided once it is safe for employees to re-enter the workplace. Each supervisor or other designated person at each relocation point will be aware of the signal used and be watchful for it.
- 4.2.5 Evacuation Wardens
  - 4.2.5.1 “Sweep” the assigned area to assure that all employees are appropriately evacuated.
  - 4.2.5.2 Carry out any other assigned duties, prior to evacuating.
  - 4.2.5.3 Report either “all clear” or any problems to the incident commander or other person designated under the company’s Emergency Action and Fire Prevention Plans prior to reporting to their assigned relocation point.
- 4.3 Fire Prevention Plan is required if Ethylene Oxide, Methylenedianiline, or 1,3-Butadiene is being used or stored in the facility.
  - 4.3.1 A fire prevention plan must be in writing, be kept in the workplace, and be made available to employees for review. However, an employer with 10 or fewer employees may communicate the plan orally to employees. At a minimum, your fire prevention plan must include:
    - 4.3.1.1 A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and

their control, and the type of fire protection equipment necessary to control each major hazard.

4.3.1.2 Procedures to control accumulations of flammable and combustible waste materials.

4.3.1.3 Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials.

4.3.1.4 The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires.

4.3.1.5 The name or job title of employees responsible for the control of fuel source hazards.

4.3.2 An employer must inform employees upon initial assignment to a job of the fire hazards to which they are exposed. An employer must also review with each employee those parts of the fire prevention plan necessary for self-protection.

## **5. Safety Information.**

### **5.1 Means of Egress (exits and exit paths)**

5.1.1 All employees must be able to safely exit the building in a direct path and within a reasonable time frame.

5.1.2 There are specific requirements for exits, paths to exits, exit signs, aisle widths and for stairways. These "life safety" codes must be considered during renovation, construction or when re-arranging a work area.

5.1.3 All exits, aisles and exit paths, and stairways must be kept clear and unobstructed. No storage is allowed that will restrict the access or use of the exit path below the required widths. No storage is allowed that will block or obstruct stairs or exit doors.

5.1.4 All exits and the paths to them must be clearly visible or have visible signs that indicate the location of the exit.

5.1.5 Locks or fastening devices to keep exit doors closed and locked from the inside (preventing the use of the door as an exit) are prohibited in almost every workplace structure (mental and correctional institutions are two exceptions). Doors that could be mistaken for an exit but are not exits must be marked "Not an Exit" or "Closet" or with similar markings so that they will not be mistaken for an exit in an emergency.

5.1.6 Emergency lighting, signs and exits must meet requirements for the number of exits, the location and size of signs and the amount of illumination required.

## 5.2 Fire Alarms and Detection

- 5.2.1 Fire alarms are required in buildings where the location of the fire will not provide adequate warning to employees and other occupants (i.e. multi-floor buildings or segregated work spaces).
- 5.2.2 Alarms must be loud enough to be heard above the ambient noise level of the work area and activate in time to provide adequate warning for the work area occupants to safely evacuate.
- 5.2.3 Alarms and signals must be tested or maintained to assure they remain in working order.
- 5.2.4 Buildings undergoing construction and renovation (where employees are still working and occupying the work areas) must have appropriate (or alternate) alarms and fire prevention systems that are at least equal to those required for the occupancy and type of hazards in the area. This includes hazards inherent to the work area and tasks performed, as well as any additional hazards caused by the construction or renovation.

## 5.3 Fixed Fire Suppression Equipment

- 5.3.1 All fixed suppression equipment must be maintained and tested by trained persons. The local fire department may provide or be able to be contracted to perform this maintenance and testing. Specific employees may be designated and trained for this service, depending upon the maintenance and testing requirements for the system.
- 5.3.2 There are various types of fixed suppression equipment. Each type must be specifically designed for the types of fires likely to be encountered. These types are:
  - 5.3.2.1 Automatic sprinklers that discharge water into an area when heat or smoke causes the valve (sprinkler head) to open. Sprinkler heads must be kept free from any obstruction (at least 18" clearance vertically and horizontally).
  - 5.3.2.2 Standpipe systems include fixed water supplies (risers) with a hose and nozzle. These systems are usually recessed in walls or found in stairwells. Standpipe systems are for use by trained fire-fighting personnel only.
  - 5.3.2.3 Dry chemical systems are discharged in rooms or over a specific process (like an electrical system). Pre-discharge alarms are required where vision could be obscured that would affect employee evacuation.
  - 5.3.2.4 Gaseous agents are normally used in enclosed rooms and spaces. Depending on the agent used to suppress the fire, pre-discharge alarms are required. Where employee evacuation cannot occur



within a specific time frame, specific agents are prohibited from being used as suppression agents.

- 5.3.2.5 Water spray and foam systems are usually utilized for a specific process hazard (like a kitchen grease pit or solvent tank). They discharge a chemical-foam that will “blanket” the fire or area with foam to “smother” the fire.

#### 5.4 Portable Fire Extinguishers

- 5.4.1 The Two Extinguisher Rule: Fire extinguishers are for controlling small, incipient fires. NEVER should more than two (2) extinguishers be used to control a fire. If the fire is not controlled with two extinguishers, it is no longer considered an incipient fire and should ONLY be extinguished by trained Firefighters or by fixed fire suppression systems.
- 5.4.2 Classes. There are five classes or types of Fire Extinguishers. Each class has distance requirements that are required for employees to access them. These types and distances are:
  - 5.4.2.1 Class A – used on ordinary combustibles (wood, paper, cloth, etc.). Extinguishers must be 75 ft. or less from the hazard.
  - 5.4.2.2 Class B – used for flammable or combustible liquids (gasoline, paint, solvents, propane). Distance must be 50 ft. or less from the hazard.
  - 5.4.2.3 Class C – used for electrical equipment and must be 50 ft. or less from the hazard.
  - 5.4.2.4 Class D – used for metals (magnesium, potassium and sodium). Extinguishers must be 75 ft. or less from the hazard.
  - 5.4.2.5 Class K – used for fires that involve cooking oils, trans-fats, or fats in cooking appliances and are typically found in restaurant and cafeteria kitchens.
- 5.4.3 General. Extinguishers must be located so they are clearly visible, readily accessible to the employees or persons designated and trained to use them and located so they are protected from damage by moving equipment.
  - 5.4.3.1 Extinguishers must be maintained in a fully charged and operable condition and kept in their designated locations.
  - 5.4.3.2 Extinguishers must be appropriate to the type (or class) of fire hazard likely to be found in the work area.
  - 5.4.3.3 Standard signs and floor markings may be utilized to increase visibility.
  - 5.4.3.4 Extinguishers should be located along normal paths of travel but protected from the direct line of traffic to avoid injury to personnel or mechanical damage.

5.4.3.5 Extinguishers are not required in workplaces where all employees will be required to evacuate the facility (total evacuation) upon the initial alarm sounding, unless extinguishers are required by a specific regulatory standard (i.e. welding, confined space, and some flammable liquid usages).

5.4.4 Inspection and Testing. Extinguishers must be visually inspected monthly. Extinguishers must be maintained annually. Extinguishers must be physically (hydrostatically) tested every 5 years or 12 years depending on the type of extinguisher. When removed from service for maintenance or testing, or due to corrosion or damage, they must be replaced with an equivalent protective system.

5.4.4.1 Fire extinguishers must be inspected internally at least monthly. The inspection will include the following:

- Ensure that units are accessible,
- Install units on wall 3-5 feet from floor from top of unit,
- Ensure that the gauge needle is in the green zone, showing the unit is fully charged,
- Ensure that the handle is secured by a pin to avoid accidental release,
- Ensure that the pin is secured with a plastic tie, and
- Ensure that the tag on the unit shows the date of each monthly inspection and the initials of the person doing the inspection.

5.4.4.2 Documentation of the inspection, maintenance and testing may be kept with the extinguisher or in a separate system, provided the records are accessible to employees or agencies that may be required to review these records. Documentation must be kept for the life of the extinguisher.

5.4.5 Employee Training

5.4.5.1 Where employees will not be required to use them, employees should be informed that they are for trained fire fighter use only.

5.4.5.2 Where employees will be required to use extinguishers, employees must be trained annually in the general principles of fire extinguisher use and the hazards involved in incipient (beginning) stage fire fighting.

## 5.5 Fire Brigades and On-Site Response Medical Teams (as appropriate)

- 5.5.1 Fire Brigades and Medical Response teams must be trained to the level or type of emergency they will likely encounter. In most cases, verified training is required, and documentation must be maintained with periodic or annual refresher training.
- 5.5.2 Team members must be physically capable of performing their duties (including the use of respiratory protection, where required). Employees with known physical conditions (heart disease, emphysema or epilepsy) or known mental or physical disabilities that would impair their ability to perform the expected duties may be required to be approved by a licensed physician prior to being allowed to participate on the team.
- 5.5.3 Teams must be provided with adequate equipment and protective clothing to perform their duties.
- 5.5.4 Equipment and clothing must be maintained in good working order. Equipment removed from service must be promptly repaired or replaced, or team members must be informed that the equipment is no longer available.
- 5.5.5 Teams must be organized, with either elected or appointed leaders, and have specific written procedures that outline their responsibilities (and limitations) about emergency response at the workplace.

## 5.6 Hot Work, Open Flame Work or Spark Producing Equipment

- 5.6.1 Permission and Permits. Any hot work or work with open flames should be performed only with the permission of company management. (Approvals may be required by the landlord or building owner, if different than company ownership.) Such work should be done only under specific restrictions and limitations to prevent fires or other hazards. This information and any restrictions or limitations should be documented. A signed permit system is recommended that outlines the details of the work and the restrictions or limitations.
  - 5.6.1.1 Contractors - shall obtain Hot Work/Open Flame Permits through the manager or supervisor in charge of the job or process.

## 6. Training and Information.

- 6.1 Emergency Action Plans and Evacuation Programs must be reviewed with each employee:
  - 6.1.1 When the program is developed or when it is changed
  - 6.1.2 Upon initial assignment to a work area
  - 6.1.3 When the workplace changes (construction or remodeling) that require a different evacuation route
  - 6.1.4 When an employee's responsibilities under the program change.

- 6.2 Fixed Suppression Systems. Employees where fixed suppression equipment agents activate (non-water systems) must be specifically trained in the alarm signal, and any protective equipment and controls needed to ensure their safety. They must have (and be trained to) specific evacuation programs from the area of discharge.
- 6.3 Emergency Response Team members must be trained based on the types of emergencies they will be expected to encounter. Fire fighting techniques, first aid treatment or both may be required, depending upon the duties and responsibilities of the team.
- 6.4 Fire extinguisher users must be trained annually in the general principles of fire extinguisher use and the hazards involved in incipient (beginning) stage fire fighting.

## 7. Definitions.

- *Brigades* – A workplace team of employees who are specifically designated to respond and fight incipient fires.
- *Fixed Suppression Equipment* – Fire extinguishing systems that are affixed in place. For example: sprinkler systems.
- *Command Post* – A designated location that is set up for communications and direction of emergency responders.
- *Incident Commander* – The person designated to direct the activities of an emergency response. This person normally remains at the command post.

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# EMERGENCY ACTION PLAN

**COMPANY NAME:**

**DATE:**

**SITE ADDRESS:**

Emergency Escape Procedures and Escape Route Assignments: (optional - attach evacuation route map)

Procedures to be followed by employees who remain to operate critical operations before they evacuate:

Procedures to account for employees after evacuation is complete (e.g. crew leader counts crew – reports status to emergency services):

Employee rescue or medical duties:

Methods to report fires and other emergencies:

Person(s) to contact for questions regarding site Emergency Action Plan or employee duties under Plan (name and phone number):

<b>FIRE</b>	<b>Notification Method (Automatic, Pull Box, Phone)</b>	<b>Site Contact</b>	<b>Emergency Number (other than 911)</b>
Fire Designated Meeting/Evacuation location(s):			
<b>TORNADO</b>	<b>Notification Method (Automatic, Pull Box, Phone)</b>	<b>Site Contact</b>	<b>Emergency Number (other than 911)</b>
Tornado Designated Meeting/Evacuation location(s):			
<b>EARTHQUAKE</b>	<b>Notification Method (Automatic, Pull Box, Phone)</b>	<b>Site Contact</b>	<b>Emergency Number (other than 911)</b>
Earthquake Designated Meeting/Evacuation location(s):			
<b>CHEMICAL SPILL/RELEASE</b>	<b>Notification Method (Automatic, Pull Box, Phone)</b>	<b>Site Contact</b>	<b>Emergency Number (other than 911)</b>
Chemical Spill/Release Designated Meeting/Evacuation location(s):			
<b>MEDICAL EMERGENCY</b>	<b>Notification Method (Automatic, Pull Box, Phone)</b>	<b>Site Contact</b>	<b>Emergency Number (other than 911)</b>
<b>Active Shooter Procedures</b>			
<b>RUN, HIDE, FIGHT</b>			
Additional Company Procedures:			
<b>Additional Emergency Procedures</b>			

# FIRE DRILL OR EVACUATION ASSESSMENT

<b>Evacuation Start time:</b>		<b>Evacuation End time:</b>		<b>Total time for evacuation process:</b>	
<b>Evacuation Routes Marked:</b>		<input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Exit Signs Visible or Evacuation Routes Posted:</b>	
				<input type="checkbox"/> Yes <input type="checkbox"/> No	

Was the building completely evacuated?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was the evacuation signal heard in every area of the building?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Did all employees meet at their designated relocation point?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Have procedures for the handicapped been addressed?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Did all equipment (stairwell doors, alarms, etc.) function properly?	<input type="checkbox"/> Yes	<input type="checkbox"/> No

**Problem or Issue Noted And Corrective Action To Be Taken:**

<b>Name of Person Responsible for Corrective Action:</b>	<b>Completed Date:</b>

**Additional Comments/Requirements:**

<b>Evaluator's Name:</b>	<b>Signature:</b>



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# TRAINING ATTENDANCE ROSTER EMERGENCY ACTION

***Emergency Action Training Includes:***

- Escape Procedures
- Procedures to follow
- Account for employees
- Employee, rescue or medical duties
- Methods to report fires or other emergencies
- Contacts

**INSTRUCTOR:**

**DATE:**

**LOCATION:**

NAME (Please Print)  
FIRST - MI - LAST

**SIGNATURE**

By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized: \_\_\_\_\_

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# TRAINING ATTENDANCE ROSTER FIRE EXTINGUISHER

***Fire Extinguisher Training Includes:***

- Types of extinguishers
- Inspection methods
- PASS system
- When you should not fight a fire

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
NAME (Please Print) FIRST - MI - LAST	<b>SIGNATURE</b>	

By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized: \_\_\_\_\_

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## PROGRAM OVERVIEW

# ERGONOMICS AND MUSCULOSKELETAL DISORDER MANAGEMENT SAFETY PROGRAM

REGULATORY STANDARD: OSHA - 29 CFR 1910 General Duty Clause

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## **INTRODUCTION**

Repetitive motions, use of force or pressure, or improper workstation set up are the primary causes of ergonomic disorders. This program allows for ergonomic evaluations for both office and manufacturing environments.

## **TRAINING**

Recommended for workplaces with high ergonomic risk.

## **ACTIVITIES**

- Evaluate the need for an ergonomics program
- Implement controls to minimize or eliminate repetitive or force trauma tasks.

## **FORMS**

- Ergonomic Office/Computer Safety Checklist
- Ergonomic Work Area Screening and Analysis Tool
- Training Attendance Roster

## **Table of Contents**

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# ERGONOMICS AND MUSCULOSKELETAL DISORDER MANAGEMENT SAFETY PROGRAM

1. **Purpose.** This document provides a program to enable an organization to effectively manage musculoskeletal disorders (MSDS) or repetitive strain injuries (RSI).
2. **Scope.** This program applies to all facilities and operations at the company. This program is limited to work-related musculoskeletal disorders.
3. **Responsibilities**
  - 3.1 Management. Management should review the following roles and responsibilities and assign them to appropriate existing or new positions as they deem appropriate. Additionally, they have the following responsibilities:
    - 3.1.1 Ultimate responsibility to ensure program requirements are met.
    - 3.1.2 Communicate the importance of the MSD management program.
    - 3.1.3 Develop and approve the goals and objectives of the company's ergonomics program and regularly review progress.
    - 3.1.4 Review organization procedures to ensure employee participation.
    - 3.1.5 Appoint one or more persons from within the company to function as a local ergonomics coordinator, as needed.
    - 3.1.6 Ensure adequate resources are available (i.e. personnel, time, equipment) to implement the program or any ergonomic initiatives undertaken.
    - 3.1.7 Ensure that personnel performing specific tasks relative to the ergonomics program or initiatives are competent based on their education, training and experience.
    - 3.1.8 Ensure, when feasible, controls to any identified ergonomic hazards are implemented.
    - 3.1.9 Ensure supervisors and employees are held accountable for reporting ergonomic incidents, as needed..
  - 3.2 Employees
    - 3.2.1 Participate in specific job and process hazard analysis and evaluations, as needed.
    - 3.2.2 Report MSDS, or MSD signs or symptoms, when recognized.



- 3.3 Ergonomics Coordinator (may also be Safety Officer or other designated person). A minimum of one coordinator is recommended per company. The total number of persons assigned to this role shall be appropriate for the goals and deliverables of the program. The responsibilities for this role should be to:
  - 3.3.1 Function as centralized local resource of ergonomic services.
  - 3.3.2 Complete any required training.
  - 3.3.3 Maintain any documentation/records associated with the program.
  - 3.3.4 Provide required training to employees, as needed or appropriate.
  - 3.3.5 Monitor regulations related to musculoskeletal disorders and provide advocacy for the employees to the company.
  - 3.3.6 Establish site wide goals and monitor performance related to continuous improvement. This may be accomplished by the following:
    - 3.3.6.1 Conducting a screening or prioritization of tasks, equipment, workplaces and processes.
    - 3.3.6.2 Participating in reviews of new designs and modifications to existing processes, equipment, or tasks, including recommendations for controlling risk factors.
    - 3.3.6.3 Consulting on issues of concern by conducting technical analysis, providing recommendations to improve identified problems, etc.
  - 3.3.7 Regularly report to management on the status of program.
  - 3.3.8 Coordinate internal audits of program against the corporate program.
- 3.4 Medical Service Provider (as needed):
  - 3.4.1 Coordinate case management process.
  - 3.4.2 Provide health-care consultations and services.
- 3.5 Engineering Professional (as needed):
  - 3.5.1 Provide technical engineering consultation for ergonomic issues.
  - 3.5.2 Assist in the development and implementation of ergonomic improvements.

#### 4. Procedure.

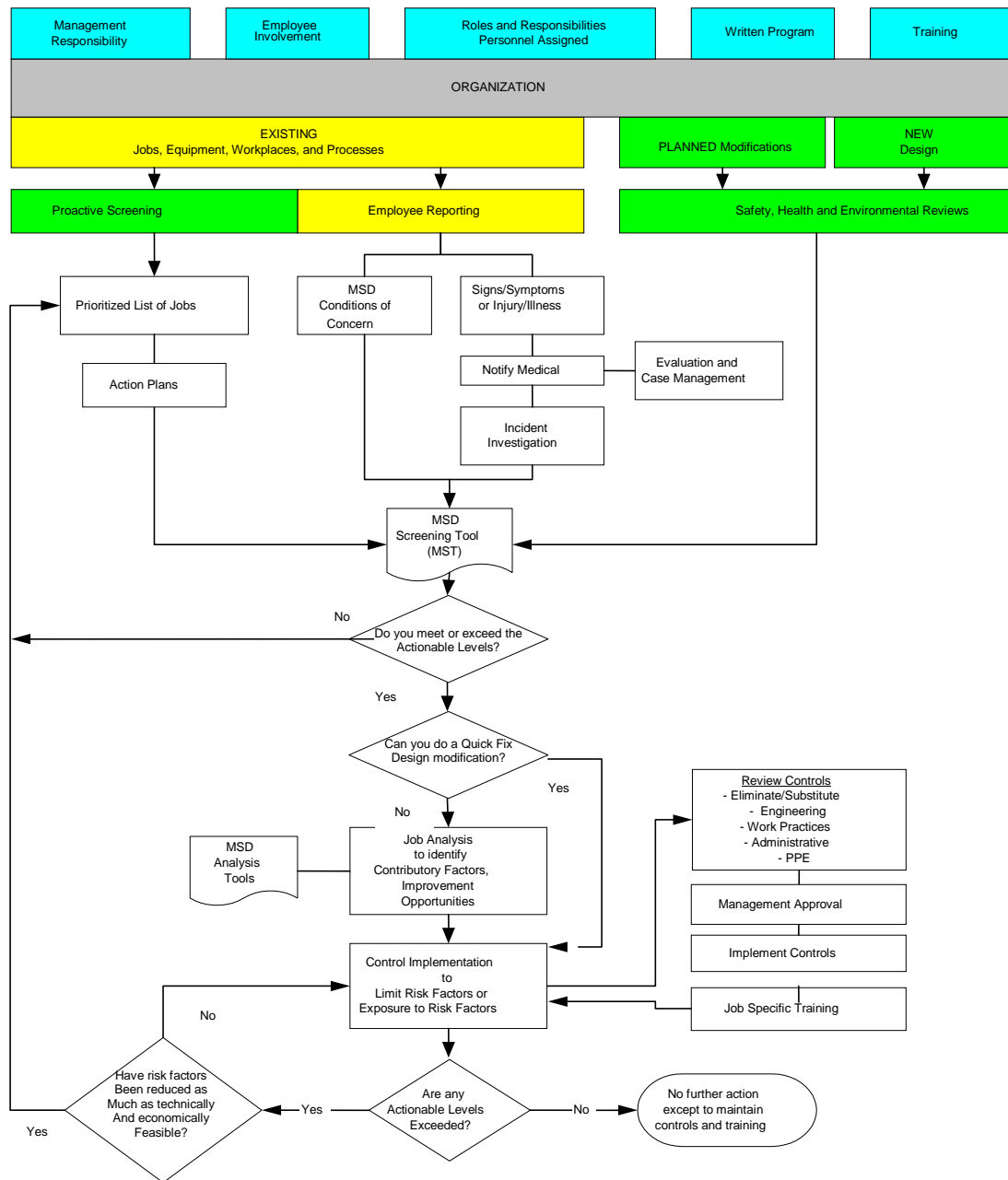
##### 4.1 Elements of a Manufacturing-Based Program:

#	Program Element	Deliverable	Retention Period
1	Management Systems	Allocate Resources and Define Responsibilities	N/A
		Written Program Document	UOS. Update annually.
		MSD Program Implementation Checklist.	UOS. 3-year review; Annual review for targeted operations.
		Action Plan / Project Activity Log.	Regular update. 3-year retention.
		Performance metric charts.	UOS. Update annually.
2	Training	Training Records.	Regular update. 10-year retention.
3	Proactive Job Screening and Assessment	Prioritized List of Jobs.	Regular update. 3-year retention.
4	Proactive Review of New and Planned Modifications	MSD Job Screening and Analysis Records. Control Implementation Records.	UOS. 5-year retention.
5	Incident Investigation		
6	Investigation of Employee Reports		
7	Management of MSD Cases	Medical case management.	N/A

*UOS - Until Obsolete or Superseded*

4.2 Figure 1 below illustrates the essential components and functions of a manufacturing based MSD management program and how they work together.

Figure 1



### 4.3 Elements of an Office or Field-Service based Program

4.3.1 Where computer/office work or field service work is the majority (75%) of the work environment, the organization may incorporate a modified program as outlined below. Field service work does not imply manufacturing maintenance departments.

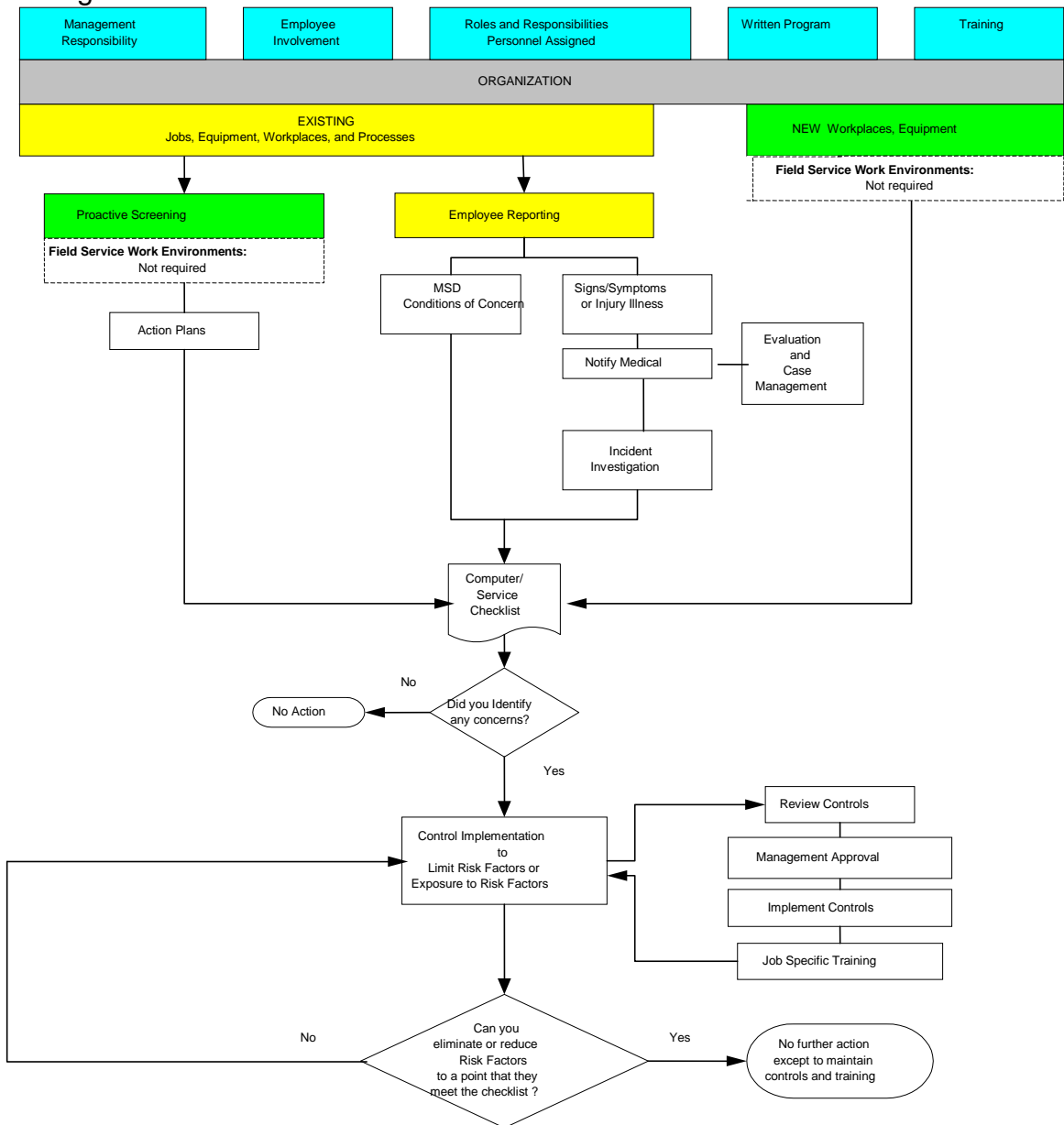
4.3.2 An office/field service based MSD management program should have the same components as shown in 4.1 with the following exceptions:

4.3.2.1 Proactive screening (see associated document - Ergonomics Screening and Analysis Tools) is not required in field service work.

4.3.2.2 Proactive review of new and planned modifications (see associated document - Ergonomics Screening and Analysis Tools) is not required in field service work.

4.3.3 Figure 2 below illustrates the essential components and functions of an office/field service based MSD management program and how they work together.

Figure 2



## 5. Safety Information

### 5.1 Recordkeeping

- 5.1.1 Completion of any ergonomics training course should be documented.
- 5.1.2 A record of evaluated jobs and implemented controls should be maintained to assist in the evaluations of similar types of tasks or activities at the company.

### 5.2 Health Surveillance

- 5.2.1 Prior to initial job assignment, or transfer of job responsibilities, employees who are to be assigned to positions involving known or suspected exposures to ergonomic hazards may receive a baseline health surveillance examination to establish where any changes in employee health status may occur. This surveillance is also designed to assist the company in determining where ergonomic controls may be required. Note: the use of medical screening tests or evaluations has not been validated as a predictive measure of risk for determining MSD related injuries and illnesses.

### 5.3 Ergonomic Screening and Surveys

- 5.3.1 Checklist. A survey checklist may be used to assist in determining ergonomic risk factors such as: posture, materials handling, and upper extremity factors. The checklist will be tailored to the specific needs and conditions of the workplace.
- 5.3.2 Ergonomic Risk Factors. Identification of ergonomic hazards is normally based on ergonomic risk factors such as, conditions of a job process, work station, or work methods that contribute to the risk of developing problems associated with ergonomic stressors. Not all of these risk factors will be present in every job containing ergonomic stressors, nor is the existence of one of these factors necessarily sufficient to cause a problem associated with CTD. Supervisors should ensure that known risk factors for specific employees, jobs or tasks are conveyed to the ergonomic assessment committee for improvement or correction.
  - 5.3.2.1 Personal Risk Factors include: Gender, Age, Anthropometry, Work method, Attitude, Training, Sight, Hearing, Smell, Physical strength, and Weight.
  - 5.3.2.2 Upper Extremities Risk Factors include: repetitive and/or prolonged activities, forceful exertions (usually with the hands), pinch grips, prolonged static postures, awkward postures (reaching and twisting), continued physical contact with work surfaces, excessive vibration from power tools and inappropriate or inadequate hand tools.

- 5.3.2.3 Back Disorder Risk Factors include: body mechanics (bending, lifting and twisting), prolonged sitting with poor posture, lack of adjustable equipment (chairs, footrests, etc.), poor grips on handles, slippery footing, frequency of movement, duration and pace, load stability, reach distances and work height.
- 5.3.2.4 Environmental Risk Factors include: floor surfaces and platforms, temperature extremes, lighting, noise and vibration.
- 5.3.2.5 Multiple Risk Factors. Jobs, operations, or work stations that have multiple risk factors have a higher probability of ergonomic risk. The combined effect of several risk factors is sometimes referred to as "multiple causation."

#### 5.4 Work Station Analysis and Design

- 5.4.1 Engineering Solutions. Engineering solutions, where feasible, are the preferred method of control for ergonomic hazards. The focus of the company ergonomics safety program is to make the job fit the person, not to make the person fit the job. This is accomplished whenever possible by redesigning the work station, work methods, or tool(s) to reduce the demands of the job.
- 5.4.2 Work Station Design. Work stations when initially constructed or when redesigned will be adjustable in order to accommodate the person who actually works at a given work station, it is not adequate to design for the "average" or typical worker. Work stations should be easily adjustable and either designed or selected to fit a specific task, so that they are comfortable for the workers using them. The work space should be large enough to allow for the full range of required movements, especially where hand-held tools are used.
- 5.4.3 Design of Work Methods. Traditional work method analysis considers static postures and repetition rates. This may be supplemented by addressing the force levels and the hand and arm postures involved. The tasks will be altered where possible to reduce these and the other stresses.
- 5.4.4 Repetitive motion. All efforts to reduce repetitive motion will be pursued. Examples of methods to reduce highly repetitive movements include:
  - 5.4.4.1 Increasing the number of workers performing a task.
  - 5.4.4.2 Lessening repetition by combining jobs with very short cycle times, thereby increasing cycle time. (Sometimes referred to as "job enlargement.").
  - 5.4.4.3 Using automation where appropriate.
  - 5.4.4.4 Designing or altering jobs to allow self-pacing or rest periods.

- 5.4.5 Force measurements. Force measurements, when taken, are noted as an estimated average effort, and a peak force. They are recorded as "light," "moderate," and "heavy." These measurements include the number of manipulations per cycle, per time frame and per work shift.
- 5.4.6 Vibration measurements. Tools can be checked for excessive vibration. (The NIOSH criteria document on vibration should be consulted).
- 5.4.7 Posture and lifting measurements. Hand, arm, and shoulder postures and movements can be assessed for levels of risk. Work stations having tasks requiring manual materials handling should have the maximum weight-lifting values calculated. (The NIOSH Work Practices Guide for Manual Lifting, 1981, should be used for basic calculations. Note that this guide does not address lifting that involves twisting or turning motions.)

## **6. Training and Information**

### **6.1 General Awareness Training**

General awareness training for ergonomics is recommended for new employees on initial assignment, and as needed.

### **6.2 Job Specific Training**

6.2.1 Job specific training may be provided on a case by case basis when work methods or engineering controls have been implemented.

6.2.2 Job Specific training is composed of the following topics:

6.2.2.1 Instruction on the safe methods of using equipment

6.2.2.2 Instruction of the identified work methods

6.2.2.3 The reasons for job specific controls

6.2.3 This training should take place in separate training sessions to the general awareness training.

## 7. Definitions.

- *Ergonomics* - A multi-disciplinary science that studies human physical and psychological capabilities and limitations. This body of knowledge can be used to design or modify the workplace, equipment, and products to improve human performance and reduce the likelihood of injury and illness.
- *Ergonomics Coordinator* - A designated person who is responsible for identifying and correcting ergonomic hazards in the workplace, including ergonomic professionals or other trained and qualified persons (such as health care providers, engineers, safety personnel or others who have received ergonomics training).
- *Ergonomic Hazards* - Workplace conditions that pose a biomechanical stress to the worker. Such hazardous workplace conditions include, but are not limited to, faulty work station layout, improper work methods, improper tools, excessive tool vibration, and job design problems that include aspects of work flow, line speed, posture and force required, work/rest regimens, and repetition rate. They are also referred to as "stressors."
- *Ergonomic risk factors* - Conditions of a job, process, or operation that contribute to the risk of developing CTDs, MSDs or RSIs.
- *Cumulative trauma disorders (CTDs)* - The term used in these guidelines for health disorders arising from repeated biomechanical stress due to ergonomic hazards. Other terms that have been used for such disorders include "repetitive motion injury," "occupational overuse syndrome," and "repetitive strain injury." CTDs are a class of musculoskeletal disorders involving damage to the tendons, tendon sheaths, synovial lubrication of the tendon sheaths, and the related bones, muscles, and nerves of the hands, wrists, elbows, shoulders, neck and back. The more frequently occurring occupationally induced disorders in this class include carpal Tunnel syndrome, epicondylitis (tennis elbow), tendonitis, tenosynovitis, synovitis, stenosing tenosynovitis of the finger, DeQuervain Disease, and low back pain.
- *Musculoskeletal Disorder (MSD)* - A disorder of the muscles, nerves, tendons, ligaments, joints, cartilage, blood vessels, or spinal discs.
  - MSDs may include muscle strains and tears, ligament sprains, joint and tendon inflammation, tendonitis, epicondylitis, carpal tunnel syndrome, rotator cuff syndrome, DeQuervain's syndrome, trigger finger, tarsal tunnel syndrome, hand-arm vibration syndrome (HAVS), and low back pain, pinched nerves, sciatica, spinal disc degeneration, and herniated spinal disc.
  - Injuries arising from slips, trips, falls, motor vehicle accidents, or similar accidents are not considered MSDs for the purposes of this program.
- *Repetitive Strain Injury (RSI)* - The terms MSD and RSI are analogous for the purposes of this program.



# ERGONOMIC OFFICE/COMPUTER SAFETY CHECKLIST

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_

## PART I – OFFICE/COMPUTER OVERVIEW:

### WORKING POSTURES–The workstation is designed or arranged for doing computer tasks so it allows your:

<b>Head and neck</b> to be upright or in-line with the torso (not bent down/back). If "no" refer to <u>Monitors</u> , <u>Chairs</u> and <u>Work Surfaces</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Head, neck, and trunk</b> to face forward (not twisted). If "no" refer to <u>Monitors</u> or <u>Chairs</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Trunk</b> to be perpendicular to floor (may lean back into backrest but not forward). If "no" refer to <u>Chairs</u> or <u>Monitors</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Shoulders and upper arms</b> to be in-line with the torso, generally about perpendicular to the floor and relaxed (not elevated or stretched forward). If "no" refer to <u>Chairs</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Upper arms and elbows</b> to be close to the body (not extended outward). If "no" refer to <u>Chairs</u> , <u>Work Surfaces</u> , <u>Keyboards</u> , and <u>Pointers</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Forearms, wrists, and hands</b> to be straight and in-line (forearm at about 90 degrees to the upper arm). If "no" refer to <u>Chairs</u> , <u>Keyboards</u> , <u>Pointers</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Wrists and hands</b> to be straight (not bent up/down or sideways toward the little finger). If "no" refer to <u>Keyboards</u> , or <u>Pointers</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Thighs</b> to be parallel to the floor and the <b>lower legs</b> to be perpendicular to floor (thighs may be slightly elevated above knees). If "no" refer to <u>Chairs</u> or <u>Work Surfaces</u> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Feet</b> rest flat on the floor or are supported by a stable footrest. If "no" refer to <b>Chairs, Work Surfaces</b> in part 2.	<input type="checkbox"/> YES <input type="checkbox"/> NO

### SEATING–Consider these points when evaluating the chair:

<b>Backrest</b> provides support for your lower back (lumbar area).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Seat width and depth</b> accommodate the specific user (seat pan not too big/small).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Seat front</b> does not press against the back of your knees and lower legs (seat pan not too long).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Seat</b> has cushioning and is rounded with a "waterfall" front (no sharp edge).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Armrests</b> , if used, support both forearms while you perform computer tasks and they do not interfere with movement.	<input type="checkbox"/> YES <input type="checkbox"/> NO

### KEYBOARD/INPUT DEVICE–Consider these points when evaluating the keyboard or pointing device. The keyboard/input device is designed or arranged for doing computer tasks so the:

<b>Keyboard/input device platform(s)</b> is stable and large enough to hold a keyboard and an input device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Input device</b> (mouse or trackball) is located right next to your keyboard so it can be operated without reaching.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Input device</b> is easy to activate and the shape/size fits your hand (not too big/small).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Wrists and hands</b> do not rest on sharp or hard edges.	<input type="checkbox"/> YES <input type="checkbox"/> NO

<b>WORK AREA—Consider these points when evaluating the desk and workstation. The work area is designed or arranged for doing computer tasks so the</b>	
<b>Thighs</b> have sufficient clearance space between the top of the thighs and your computer table/keyboard platform (thighs are not trapped).	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Legs and feet</b> have sufficient clearance space under the work surface so you are able to get close enough to the keyboard/input device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>ACCESSORIES—Check to see if the:</b>	
<b>Document holder</b> , if provided, is stable and large enough to hold documents.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Document holder</b> , if provided, is placed at about the same height and distance as the monitor screen so there is little head movement, or need to re-focus, when you look from the document to the screen.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Wrist/palm rest</b> , if provided, is padded and free of sharp or square edges that push on your wrists.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Wrist/palm rest</b> , if provided, allows you to keep your forearms, wrists, and hands straight and in-line when using the keyboard/input device.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Telephone</b> can be used with your head upright (not bent) and your shoulders relaxed (not elevated) if you do computer tasks at the same time.	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>GENERAL</b>	
Workstation and equipment have sufficient adjustability so you are in a safe working posture and can make occasional changes in posture while performing computer tasks.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Computer workstation, components and accessories are maintained in serviceable condition and function properly.	<input type="checkbox"/> YES <input type="checkbox"/> NO
Computer tasks are organized in a way that allows you to vary tasks with other work activities, or to take micro-breaks or recovery pauses while at the computer workstation.	<input type="checkbox"/> YES <input type="checkbox"/> NO

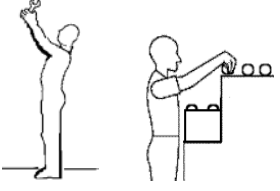
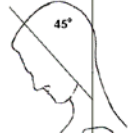

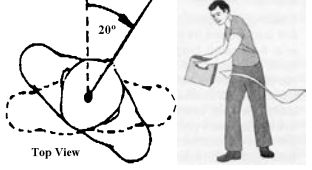
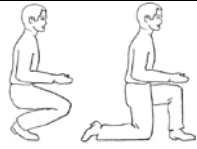

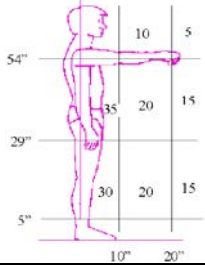
## PART II – OFFICE/COMPUTER IN-DEPTH ASSESSMENT TIPS

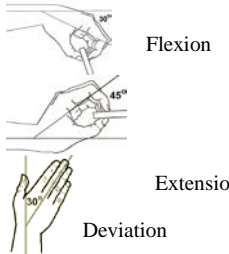

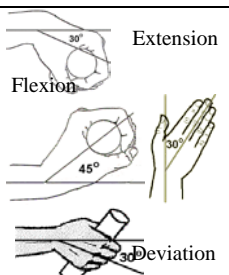
<b>Monitors</b>	<input checked="" type="checkbox"/>
Make sure the screen is large enough for adequate visibility. Usually a 15 to 20-inch monitor is sufficient. Smaller units will make it difficult to read characters and larger units may require excessive space.	<input type="checkbox"/>
The angle and tilt should be easily adjustable.	<input type="checkbox"/>
Flat panel displays take less room on the desk and may be more suitable for locations with limited space.	<input type="checkbox"/>
<b>Keyboards</b>	<input checked="" type="checkbox"/>
Split keyboard designs will allow you to maintain neutral wrist postures.	<input type="checkbox"/>
Keyboards with adjustable feet will accommodate a wider range of keyboard positions and angles. Adjustable feet on the front as well as the back will further aid adjustments. Increased adjustability will facilitate neutral wrist postures.	<input type="checkbox"/>
The cord that plugs into the CPU should be long enough to allow the user to place the keyboard and the CPU in a variety of positions. At least six feet of cord length is desirable.	<input type="checkbox"/>
Consider a keyboard without a 10-key keypad if the task does not require one. If the task does require one occasionally, a keyboard with a separate 10-key keypad may be appropriate. Keyboards without keypads allow the user to place the mouse closer to the keyboard.	<input type="checkbox"/>
Consider the shape and size of the keyboard if a keyboard tray is used. The keyboard should fit comfortably on the tray.	<input type="checkbox"/>
Consider keyboards without built-in wrist rest, because separate wrist rests are usually better.	<input type="checkbox"/>
Keyboards should be detached from the display screen if they are used for a long duration keying task. Laptop keyboards are generally not suitable for prolonged typing tasks.	<input type="checkbox"/>
<b>Keyboard Trays</b>	<input checked="" type="checkbox"/>
Keyboard trays should be wide enough and deep enough to accommodate the keyboard and any peripheral devices, such as a mouse.	<input type="checkbox"/>
If a keyboard tray is used, the minimum vertical adjustment range (for a sitting position) should be 22 inches to 28 inches from the floor.	<input type="checkbox"/>
Keyboard trays should have adjustment mechanisms that lock into position without turning knobs. These are frequently over tightened, which can lead to stripped threads, or they may be difficult for some users to loosen.	<input type="checkbox"/>
<b>Desks and Work Surfaces</b>	<input checked="" type="checkbox"/>
The desk area should be deep enough to accommodate a monitor placed at least 20 inches away from your eyes.	<input type="checkbox"/>
Ideally, your desk should have a work surface large enough to accommodate a monitor and a keyboard. Usually about 30 inches is deep enough to accommodate these items.	<input type="checkbox"/>
Desk height should be adjustable between 20 inches and 28 inches for seated tasks. The desk surface should be at about elbow height when the user is seated with feet flat on the floor. Adjustability between seated and standing heights is desirable.	<input type="checkbox"/>
You should have sufficient space to place the items you use most often, such as keyboard, mouse, and monitor directly in front of you.	<input type="checkbox"/>
There should be sufficient space underneath for your legs while sitting in a variety of positions. The minimum under-desk clearance depth should be 15 inches for your knees and 24 inches for your feet. Clearance width should be at least 20 inches.	<input type="checkbox"/>

<b>Desks and Work Surfaces [continued]</b>	<input checked="" type="checkbox"/>
Purchasing a fixed-height desk may require the use of a keyboard tray to provide adequate height adjustment to fit a variety of users.	<input type="checkbox"/>
Desktops should have a matte finish to minimize glare. Avoid glass tops.	<input type="checkbox"/>
Avoid sharp leading edges where your arms come in contact with work surfaces. Rounded or sloping surfaces are preferable.	<input type="checkbox"/>
The leading edge of work surface should be wide enough to accommodate the arms of your chair, usually about 24 to 27 inches. Spaces narrower than this will interfere with arm rests and restrict your movement. This is especially important in four-corner work units.	<input type="checkbox"/>
<b>Chairs</b>	<input checked="" type="checkbox"/>
The chair should be easily adjustable.	<input type="checkbox"/>
The chair should have a sturdy five-legged base with good chair casters that roll easily over the floor or carpet.	<input type="checkbox"/>
The chair should swivel 360 degrees so it is easier to access items around your workstation without twisting.	<input type="checkbox"/>
Minimum range for seat height should be about 16 inches.	<input type="checkbox"/>
Seat pan length should be 15 inches to 17 inches.	<input type="checkbox"/>
Seat pan width should be at least as wide as the user's thighs. A minimum width of about 18 inches is recommended.	<input type="checkbox"/>
Chair edges should be padded and contoured for support.	<input type="checkbox"/>
Seat pan tilt should have a minimum adjustable range of about 5 degrees forward and backward.	<input type="checkbox"/>
Avoid severely contoured seats as these limit seated postures and are uncomfortable for many users.	<input type="checkbox"/>
Front edge of the seat pan should be rounded in a waterfall fashion.	<input type="checkbox"/>
Material for the seat pan and back should be firm, breathable, and resilient.	<input type="checkbox"/>
The seat pan depth should be adjustable. Some chairs have seat pans that slide forward and backward and have a fixed back. On others the seat pan position is fixed and the backrest moves horizontally forward and backward so the effective depth of the seat pan can be adjusted. <b>Beware</b> of chairs where the back only tilts forward and backward. These do not provide adequate adjustment for a wide range of users.	<input type="checkbox"/>
The backrest should be at least 15 inches high and 12 inches wide and should provide lumbar support that matches the curve of your lower back.	<input type="checkbox"/>
The backrest should widen at its base and curve in from the sides to conform to your body and minimize interference with your arms.	<input type="checkbox"/>
The backrest should allow you to recline at least 15 degrees and should lock into place for firm support.	<input type="checkbox"/>
The backrest should extend high enough to support your upper trunk and neck/shoulder area. If the backrest reclines more than about 30 degrees from vertical, a headrest should be provided.	<input type="checkbox"/>
Armrests should be removable and the distance between them should be adjustable. They should be at least 16 inches apart.	<input type="checkbox"/>
Armrest height should be adjustable between 7 inches and 10.5 inches from the seat pan. Fixed height armrests are not desirable, especially for chairs that have more than one user.	<input type="checkbox"/>
Armrests should be large enough (in length and width) to support your forearm without interfering with the work surface.	<input type="checkbox"/>
Armrests should be padded and soft.	<input type="checkbox"/>

<b>Chairs [continued]</b>	<input checked="" type="checkbox"/>
Most chairs are designed for weights under 275 pounds. If the user weighs more than 275 pounds, the chair must be designed to support the extra weight.	<input type="checkbox"/>
<b>Document Holders</b>	<input checked="" type="checkbox"/>
The document holder needs to be stable but easy to adjust for height, position, distance, and viewing angle.	<input type="checkbox"/>
If the monitor screen is your primary focus, purchase a document holder that will sit next to the monitor at the same height and distance.	<input type="checkbox"/>
If the task requires frequent access to the document (such as writing on the document) a holder that sits between the keyboard and monitor may be more appropriate.	<input type="checkbox"/>
<b>Wrist Rests</b>	<input checked="" type="checkbox"/>
Wrist rest should match the front edge of the keyboard in width, height, slope, and contour.	<input type="checkbox"/>
Pad should be soft but firm. Gel type materials are recommended.	<input type="checkbox"/>
Wrist rest should be at least 1.5 inches deep (depth away from the keyboard) to minimize contact pressure on the wrists and forearm.	<input type="checkbox"/>
<b>Mouse/Pointing Devices</b>	<input checked="" type="checkbox"/>
Choose a mouse/pointer based on the requirements of your task and your physical limitations. There really is no difference, other than preference, among a mouse, trackball, or other device.	<input type="checkbox"/>
A mouse should match the contour of your hand and have sufficient cord length to allow its placement next to the keyboard.	<input type="checkbox"/>
If you choose a trackball, avoid ones that require the thumb to roll the ball--they may cause discomfort and possible injury to the area around your thumb.	<input type="checkbox"/>
A smaller mouse may be more appropriate especially if you have small hands. Caution should be taken if a mouse is used by more than one person.	<input type="checkbox"/>
A mouse that has sensitivity adjustments and can be used with either hand is desirable.	<input type="checkbox"/>
<b>Telephones</b>	<input checked="" type="checkbox"/>
If task requirements mandate extended periods of use or other manual tasks such as typing while using the phone, use a telephone with a "hands-free" headset.	<input type="checkbox"/>
The telephone should have a speaker feature for "hands-free" usage.	<input type="checkbox"/>
"Hands-free" headsets should have volume adjustments and volume limits.	<input type="checkbox"/>
<b>Desk Lighting</b>	<input checked="" type="checkbox"/>
Good desk lighting depends on the task you're performing. Use bright lights with a large lighted area when working with printed materials. Limit and focus light for computer tasks.	<input type="checkbox"/>
The location and angle of the light sources, as well as their intensity levels, should be fully adjustable.	<input type="checkbox"/>
The light should have a hood or filter to direct or diffuse the light.	<input type="checkbox"/>
The base should be large enough to allow a range of positions or extensions.	<input type="checkbox"/>

# ERGONOMIC WORK AREA SCREENING AND ANALYSIS TOOL

Body Part	Action Code	Physical Risk Factor	Duration (cumulative)	Visual Aid
<b>A – Awkward Posture</b>				
Shoulders	A1	Working with the arms fully extended <b>or</b> Raising the hand(s) or the elbows above the shoulder(s) (48" for a 5 <sup>th</sup> %ile population) <i>in either a long-duration static hold (i.e. 15 min.) or in a short-duration repetitive manner (more than once per minute).</i>	2 hrs or more per day	
Neck	A2	Working with the neck bent more than 45° (without support or the ability to vary posture)	2 hrs or more per day	
Back	A3	Working with the back bent forward more than 30° (without support or the ability to vary posture)	2 hrs or more per day	
	A4	Working with the back twisted more than 20°	2 hrs or more per day	
	A5	Repetitively (more than 2 times/minute) Working with the back twisted more than 20°	2 hours <u>continuously</u>	
Legs	A6	Squatting, crouching or kneeling	2 hrs or more per day	
<b>B – Repeated Impact</b>				
Hands, Knees	B1	Repetitively (more than 1 per 5 minutes) Using the hand (heel/base of palm) or knee as a hammer	2 hrs or more per day	
<b>C – Force</b>				
Back, shoulders	C1	Lifting more than 50 pounds <b>at any one time</b> ;		No figure
	C2	Repetitively (more than once per minute) Lifting weight (in pounds) greater than the limits in the visual aid (Based on NIOSH '91 for a 50%ile person heights, and 5%ile reach)	4 hrs or more per day	
	C3	Pushing/pulling with more than 50 pounds of initial force (e.g. truck with a total weight of 1000 pounds)	2 hrs or more per day	No figure

Body Part	Action Code	Physical Risk Factor	Combined With	Duration (cumulative)	Visual Aid
<b>C – Force (continued)</b>					
Back	C4	<b>Carrying</b> 30 lbs or more at waist level	More than 25 feet or more than once every 5 minutes	2 hours or more per day	No figure
Arms, wrists, hands	C5	<b>Pinching</b> while exerting a force of 2 lbs or more per hand. (comparable to pinching half a ream of paper)	More than 3 times / minute	1.5 hrs or more per day	No figure
	C6		Wrists bent in: flexion 30° or more, or extension 45° or more, or deviation 30° or more.	1 hrs or more per day	 Flexion Extension Deviation
	C7		No other risk factors	2 hrs or more per day	
	C8	<b>Gripping</b> an unsupported object(s) weighing 10 or more pounds per hand, or with a force of 10 pounds or more per hand (comparable to clamping light duty automotive jumper cables onto a battery)	More than 3 times / minute	1.5 hrs or more per day	No figure
	C9		Wrists bent in: flexion 30° or more, or extension 45° or more, or deviation 30° or more,	1 hrs or more per day	 Extension Flexion Deviation
	C10		Wide grasp	1 hrs or more per day	No figure
	C11	No other risk factors	2 hrs or more per day	No figure	
<b>D – Repetition / Recovery</b>					
Neck, shoulders, elbows, wrists, hands	D1	Using the same motion more than twice per minute (excluding keying activities)	No other risk factors	6 hrs or more per day	
	D2		Wrists bent in: flexion 30° or more, or extension 45° or more, or deviation 30° or more (see figures above). <b>AND</b> High force hand exertion(s)	2 hrs or more per day	
	D3	Intensive keying and mousing	Awkward posture: including bent wrists (as described above), extended arms, tilted neck, back leaned forward.	2 hrs or more per day	
	D4		No other risk factors	7 hrs or more per day	
<b>E – Vibration / Contact Stress</b>					
Hand, whole body	E1	Pressure against soft tissue (e.g. square edge / ridge)		30 min or more per day	
	E2	Using vibrating tools or equipment that typically have <u>high</u> vibration levels (>10 m/s <sup>2</sup> chainsaws, jack hammers, percussive tools, riveting hammers)		30 min. or more per day	
	E3	Using vibrating tools or equipment that typically have <u>moderate</u> vibration levels (5 m/s <sup>2</sup> jig saws, grinders)		2 hrs or more per day	

# TRAINING ATTENDANCE ROSTER ERGONOMICS

- Office Ergo Training Includes:
- Definitions
  - Stressors
  - Temperatur/Lighting
  - CTDs and Risk Factors
  - Workstation/Computer Set Up
  - Hazards and Controls

- Manufacturing Ergo Training Includes:
- Definitions and Benefits
  - Causes and Risks
  - Lifting and Work Postures
  - Force motions and Vibration
  - Workstation/Computer Set Up

- Kitchen/Restaurant Ergo Training Includes:
- Temperature/Lighting
  - Work Hours
  - Lifting and Carrying
  - Postures (bending, reaching)
  - Housekeeping and slips/trips

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
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NAME (Please Print) FIRST - MI - LAST	<b>SIGNATURE</b>
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By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed.


Name of Interpreter, if utilized: \_\_\_\_\_



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## PROGRAM OVERVIEW

# GENERAL SAFETY AWARENESS PROGRAM

REGULATORY STANDARD: *OSHA General Duty Clause*

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## INTRODUCTION

This program assists in establishing general safety requirements for most workplaces.

## TRAINING

Recommended training for an overview of workplace hazards.

## ACTIVITIES

- Ensure the workplace is maintained free of any hazards to which employees could be exposed
- Inspect the workplace for hazards that are likely to cause death or serious physical harm
- Ensure employees understand the safety requirements that apply to their tasks/activities
- Ensure processes are in place to correct hazards

## FORMS

- General Safety Rules
- New Employee Safety Orientation Training
- Training Attendance Roster

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

# GENERAL SAFETY AWARENESS PROGRAM

**1. Purpose.** This document provides a written general safety program for the company. This program is designed to establish clear company goals and objectives. This information should be communicated to all employees upon hire, and as needed thereafter.

**2. Scope.** Applies to all employees at company facilities and sites.

## **3. Responsibilities**

### 3.1 Management

3.1.1 Identify and evaluate any safety hazards.

3.1.2 Prioritize and address safety hazards based on risk level.

3.1.3 Provide reasonable solutions to reduce or eliminate recognized safety hazards.

3.1.4 Enforce federal, state and company safety rules and regulations in the workplace.

### 3.2 Employees

3.2.1 Report safety concerns and hazards to your Supervisor.

3.2.2 Participate in the resolution of the recognized safety hazards, as needed or required.

3.2.3 Conduct work activities in a safe manner.

3.2.4 Abide by all the safety rules and regulation established by the company.

3.2.5 Assist in maintaining the work area in a clean and neat condition.

## **4. Procedure**

### 4.1 General Work Rules

#### 4.1.1 General Duty Clause

4.1.1.1 OSHA's general duty clause states that companies must provide a place of employment that is free from recognized hazards.

4.1.1.2 Each employee is responsible to comply with the standards and regulations that are applicable to their work activities.

4.2 Disciplinary Actions for Willful Unsafe Acts. Employees who willfully endanger themselves or the safety of their co-workers may be subject to the disciplinary action procedures stipulated by company policy or the Employee Handbook.

#### 4.2.1 Housekeeping

- 4.2.1.1 Every safety management program includes standards for general housekeeping. Housekeeping ensures that materials and contaminants do not accumulate and cause hazards to employee safety and health.
- 4.2.1.2 Workplaces will be cleaned on a regular basis.
- 4.2.1.3 Restrooms will be kept in a sanitary condition.
- 4.2.1.4 Materials will be stored in designated areas and not allowed to accumulate in places where employee safety could be at risk (i.e. aisles, corridors, stairwells, near exits, around machinery or equipment where employees work, etc.).
- 4.2.1.5 Tools and equipment will be stored in their appropriate places.
- 4.2.1.6 Chemicals will be handled according to their instructions. Spills or leaks will be cleaned up immediately and prevented from reoccurring.
- 4.2.1.7 Protective equipment will be used, as needed or required.

#### 4.3 Accident and Incident Investigation and Reporting, and Recordkeeping)

- 4.3.1 All accidents and injuries (and work-related illnesses) are required to be reported to your supervisor or manager.
- 4.3.2 Depending on the severity of the injury, an incident or injury report may be generated and documented. Additionally, if the company is required to report incidents to insurance or government agencies, then this information may be shared with these entities or organizations.
- 4.3.3 Also, depending on the severity of the injury, an investigation may be required to determine some information that is required to be reported.

#### 4.4 Audits and Inspections

- 4.4.1 Safety *audits* are formal reviews of employee activities, workplace processes and systems, and documentation. Audits normally use pre-established or written protocols or inspection reports to assure that the written procedures and process flows indicate what the employees are supposed to do, and that employees are following the procedures as written. Audits will normally have a final written summary report of the non-conformances that is presented to management. Each finding or non-conformance will have corrective actions assigned by management to correct the deficiency in the system.

4.4.2 Safety *inspections* are informal reviews of employee activities, workplace processes, systems and documentation. Inspections may use pre-established written checklists or may be even less-formal. The checklists are normally in a yes/no format that indicates whether or not the activity or process is compliant with what is required. Inspection findings are generally discussed with area supervisors or management, and the retention of the checklist (to assure that the items have been corrected before the next inspection) is normally the only documentation maintained.

4.4.3 Some regulations require that procedures or activities be inspected, and that the inspection documentation be retained for a specified period of time. However, inspection reports are generally kept only until all action items are addressed or they are superseded by subsequent inspection reports.

#### 4.5 Ventilation

4.5.1 General building ventilation systems are usually adequate to remove particulate matter and circulate fresh air throughout the building. Ventilation concerns are generally caused by:

4.5.1.1 Faulty filters in fresh air ducts

4.5.1.2 Corridors leading from outside areas (where dust and particulate matter can be drawn into the building)

4.5.1.3 Enclosed rooms where equipment is located in a small space (paper dust and/or toner dust or fumes being generated).

4.6 Lighting. The role of proper lighting is to provide a safe, comfortable and efficient visual environment. The following safe lighting criteria will be used to evaluate lighting conditions in office areas:

4.6.1 Bare light sources will not be placed in the visual working field of any employee. Light sources will be properly shielded in these instances.

4.6.2 The luminance and reflectance of surfaces of furnishings, shades, louvers, acoustic screens, and similar workplace fixtures will be considered to reduce their reflectance.

4.6.3 Windows will be covered where appropriate.

4.6.4 Wall surface colors and degree of reflectance will be appropriate to the work area.

4.6.5 Furniture should be arranged so that the light source is beside or behind rather than in front of the operator. Light will then be directed across the work surface rather than into the worker's eyes.

## 5. Safety Information

### 5.1 Records Retention

- 5.1.1 Training Records are maintained until they are superseded by new training, unless otherwise required by regulation.
- 5.1.2 Audit Reports are kept for 5 years or until all findings are corrected, whichever is longer.
- 5.1.3 Inspection Reports are kept until all findings are corrected, the reports are superseded by new reports, or for a duration specified by a specific regulation, whichever is longer.
- 5.1.4 OSHA 300 logs and associated Injury and Illness Records are kept for 5 years.
- 5.1.5 Certain hazardous chemical exposure records (e.g. cancer causing agents, benzene, asbestos, and mercury) and biological exposure records (e.g. needle stick injuries of contaminated blood or body fluids) are kept for the duration of employment plus 30 years.
- 5.1.6 Other safety records are generally kept only until the actions that are required to be taken are complete.

## 6. Training and Information

### 6.1 Employee Orientation and General Safety Training

- 6.1.1 All new employees should be provided with a general safety orientation upon initial assignment. This orientation will include:
  - 6.1.1.1 A review of the company's emergency action and evacuation policy or procedures.
  - 6.1.1.2 A review of the employee responsibilities with regard to workplace safety and an overview of the general safety workplace rules.
  - 6.1.1.3 The hazards that may be encountered in the workplace.
  - 6.1.1.4 The process for reporting hazards, accidents, injuries and near-misses.
  - 6.1.1.5 It is additionally recommended that the orientation include information on office safety and ergonomics.
- 6.1.2 Employees who transfer or change jobs within the company will be provided with work area specific training in the hazards they may encounter.
- 6.1.3 All new hire training will take place within 10 days of hire or before being exposed to any specific hazard that requires training.



## **7. Definitions**

7.1 *None required at this time*

## GENERAL SAFETY RULES

The company establishes the following safety rules as General Safety Rules for all departments:

Never take chances. If you're unsure, you're unsafe!

Report all injuries to your supervisor

Understand the hazards of any tasks or activities or any chemicals used, and how to best protect yourself

Use Personal Protective Equipment when required

Pay attention to housekeeping, putting materials and stored equipment in their proper place.

Do not lift items that are too bulky or too heavy to be handled by one person. Ask for assistance.

Keep all aisles, stairways, and exits clear of materials, storage, equipment, and spillage.

Do not block emergency exit routes, sprinkler shutoffs, electrical control panels, or fire extinguishers.

Filing cabinets, desks, storage cabinets, and other storage devices should have drawers closed when not in use to prevent tripping hazards.

Extension cords are temporary measures only and should not replace permanent wiring. Cords should be placed so that they are flush to the ground and do not present a tripping hazard. Electrical outlets should be properly used and never overloaded.

Burned out light bulbs should be replaced immediately.

Additional general safety rules:

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# NEW EMPLOYEE SAFETY ORIENTATION TRAINING LIST

Employee's Name:	Date Assigned:	Department:
Job Title:		
Supervisor's Name:	Date of Review:	Signature:

**Instructions to Supervisor:** Check all boxes that apply. Review the duty requirements of the new employee and select the safety topics that the employee must be trained on.

SAFETY TOPIC		SAFETY TOPIC	
<input type="checkbox"/>	Access to Employee Exposure and Medical Records	<input type="checkbox"/>	Lead Exposure
<input type="checkbox"/>	Accident Reporting	<input type="checkbox"/>	Lockout / Tagout
<input type="checkbox"/>	Aerial Lift - Personal Fall Arrest System	<input type="checkbox"/>	Machine Guarding
<input type="checkbox"/>	Back Safety <input type="checkbox"/> General Lifting <input type="checkbox"/> Medical/Personnel Lifting	<input type="checkbox"/>	Mechanical Power Presses
<input type="checkbox"/>	Bloodborne Pathogens Including PPE	<input type="checkbox"/>	Overview - Construction
<input type="checkbox"/>	Blood and Body Fluids Safety Awareness	<input type="checkbox"/>	Pallet Jack - Electrical
<input type="checkbox"/>	Compressed Gas	<input type="checkbox"/>	Personal Protective Equipment
<input type="checkbox"/>	Confined Space Entry	<input type="checkbox"/>	Radiation Safety Awareness
<input type="checkbox"/>	Construction Demolition	<input type="checkbox"/>	Respirators <input type="checkbox"/> Air Purifying <input type="checkbox"/> Filtering Face Pieces <input type="checkbox"/> Supplied Air
<input type="checkbox"/>	Construction Excavation Trenching and Shoring	<input type="checkbox"/>	Safe Driving
<input type="checkbox"/>	Cranes, Hoists, and Slings (Internal)	<input type="checkbox"/>	Safety Committee Members
<input type="checkbox"/>	Electrical Safety	<input type="checkbox"/>	Scaffolds
<input type="checkbox"/>	Emergency Action	<input type="checkbox"/>	Scissors Lifts
<input type="checkbox"/>	Ergonomics <input type="checkbox"/> General Industry <input type="checkbox"/> Office	<input type="checkbox"/>	Silica Exposure
<input type="checkbox"/>	Extreme Temperature <input type="checkbox"/> Cold <input type="checkbox"/> Heat	<input type="checkbox"/>	Slips, Trips and Falls
<input type="checkbox"/>	Eyewash and Safety Shower	<input type="checkbox"/>	Walking & Working Surfaces
<input type="checkbox"/>	Fall Protection Construction	<input type="checkbox"/>	Welding
<input type="checkbox"/>	Fall Protection General Industry	<b>Other Topics</b>	
<input type="checkbox"/>	Fire Extinguisher	<input type="checkbox"/>	
<input type="checkbox"/>	First Aid (Basic)	<input type="checkbox"/>	
<input type="checkbox"/>	Flammable Liquids for Container Storage	<input type="checkbox"/>	
<input type="checkbox"/>	Forklift	<b>Supervisor Topics</b>	
<input type="checkbox"/>	Forklift, Order Picker and PFAS	<input type="checkbox"/>	Accident Investigation
<input type="checkbox"/>	General Safety Orientation	<input type="checkbox"/>	Crisis & Disaster Planning
<input type="checkbox"/>	Hand and Portable Power Tools	<input type="checkbox"/>	JHA Job Hazard Analysis
<input type="checkbox"/>	Hazard Communication	<input type="checkbox"/>	Marking Industrial Hazards
<input type="checkbox"/>	Hazardous Chemicals in the Laboratory	<input type="checkbox"/>	OSHA Recordkeeping
<input type="checkbox"/>	Hearing Protection	<input type="checkbox"/>	Return to Work
<input type="checkbox"/>	Ladder Safety	<input type="checkbox"/>	Rim Wheel Servicing
<input type="checkbox"/>	Lasers	<input type="checkbox"/>	Safety Program Overview

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## PROGRAM OVERVIEW

# HAND AND PORTABLE POWER TOOLS SAFETY PROGRAM

REGULATORY STANDARD: OSHA - 29 CFR 1910.241 – 244  
- 29 CFR 1926.300 – 305

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## **INTRODUCTION**

Tools can present a variety of hazards including cuts, lacerations, blindness from flying particles, and serious contusions if caught in rotating parts or nip points. Tools must be inspected and, when required, employees trained in the proper use, inspection and maintenance of the tools and their guarding systems. Personal protective equipment (such as safety glasses or gloves) may frequently be required, even if guarding systems are in place.

## **TRAINING**

- Training is recommended for power tool use
- Training and licensing is required for tools that use explosive charges (powder-actuated)

## **ACTIVITIES**

- Inspect tools before use to ensure they are in good operating condition.
- Look for items such as housing integrity, complete insulation on cord systems, and that grounding pins have not been removed from plug-sets.

## **FORMS**

- Hand and Portable Tool Guarding and Safety Requirements
- Training Attendance Roster

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

# HAND AND PORTABLE POWER TOOLS SAFETY PROGRAM

1. **Purpose.** The company requires that hand and portable power tools be purchased, maintained, and used only by qualified personnel who understand the limitations and requirements for the safe use of such tools. This safety program will be reviewed and evaluated:
  - 1.1 On an annual basis or more frequently as needed.
  - 1.2 When changes occur to 29 CFR 1910.221 - 244 that prompt revision of this document.
  - 1.3 When facility operational changes occur that require a revision of this document.
2. **Scope.** Applies to all locations where portable hand and power tools are used or maintained.
3. **Responsibilities**
  - 3.1 Management/Supervisors
    - 3.1.1 Purchase only those electrical tools that have been listed by a Nationally Recognized Testing Laboratory (NRTL) such as Underwriter's Laboratory (UL).
    - 3.1.2 Ensure that procedures are in place to conduct visual inspections of tools prior to use.
    - 3.1.3 If testing is required (e.g., GFCI testing before each use) procedures will be in place to ensure compliance.
    - 3.1.4 Ensure that employees using tools understand and follow manufacturer's instructions, routinely inspect tools, and use them only for the purpose for which they were designed.
    - 3.1.5 Be aware of and make available, as appropriate, ergonomically designed tools for repetitive tasks and for those jobs for which a job hazard analysis or ergonomic assessment indicates a need for such tools.
    - 3.1.6 Ensure that a maintenance program is in place to identify and repair defective or unsafe tools. Repairs to portable electrical tools may only be made by an authorized manufacturer's tool service/repair group or by the approved company sources.
    - 3.1.7 Training may be conducted as part of an apprenticeship program or in other recognized training forums.
    - 3.1.8 Employees who indicate they have had prior training will be required to demonstrate understanding and capabilities prior to being assigned to work.
    - 3.1.9 Retain manufacturer's instructions for training/reference purposes.

3.1.10 Ensure that periodic assessments and inspections of tools and tool use are performed.

## 3.2 Employees

3.2.1 Use only company provided or approved tools. Tools brought from home must have prior permission from the company and may be subject to inspection.

3.2.2 Attend training, as needed or required, for tool use.

3.2.3 Report incidents, accidents or signs and symptoms of injury to your supervisor.

## 4. Procedure

### 4.1 General Requirements

4.1.1 No one will use an unsafe/defective tool. Tools that are damaged or defective will be removed from service.

4.1.2 Hand and power tools that may generate sparks or high temperatures will not be used in areas that are hazardous due to the presence of flammable or combustible materials.

4.1.3 The company is responsible for supplying proper power and specialized application tools for employee use.

4.1.4 Only qualified/trained personnel will operate powder-actuated tools.

4.1.5 Before a job is started, the supervisor or designee will ensure that the employee is fully aware of the hazards associated with the particular tool to be used.

4.1.6 Either Ground Fault Circuit Interrupter (GFCI) Protection or an Assured Equipment Grounding Conductor Program will be provided for all 120V (or greater) powered tools.

4.1.7 Adapters that interrupt the continuity of the equipment grounding conductor will not be used (e.g., 3-wire to 2-wire adapter.)

4.1.8 Double-insulated tools do not require an equipment grounding conductor (3rd wire) in the cord, but they do require GFCI protection.

4.1.9 Modifications will not be made to any tool or related equipment. Follow site or business unit established procedures when repairs are necessary.

4.1.10 Do not abuse power cords or hoses. Never carry tools by the cord or hose or yank to disconnect. Protect cords and hoses from heat, oil, and sharp edges.

- 4.1.11 Cords and hoses will be routed in such a manner as to not create a tripping hazard.
- 4.2 Types of Tools Appropriate for Use
  - 4.2.1 Ensuring the type of tool is appropriate for the job requires:
    - 4.2.1.1 Recognition of applicable hazards associated with the work to be completed.
    - 4.2.1.2 Tool determination and additional requirements.
    - 4.2.1.3 Procedures for removal of a tool from service.
    - 4.2.1.4 Where tools are used which could present a hazard to anyone other than the user, all other employees will be instructed concerning hazards.
  - 4.2.2 Tool identification. Tools having identification numbers will be checked for legibility.
- 4.3 Pre-Use Safety
  - 4.3.1 Use the correct tool for the job.
  - 4.3.2 Remove adjusting keys and wrenches before connecting to the power supply.
- 4.4 Pre-Use Inspection
  - 4.4.1 Prior to each use, visually inspect all portable electric tools and accessories for damages or defects, per the following:
    - 4.4.1.1 Portable electric tools-check:
      - 4.4.1.1.1 Tool general condition.
      - 4.4.1.1.2 Cord for damage or deterioration.
      - 4.4.1.1.3 Cord grip tightness.
      - 4.4.1.1.4 Plug cap condition (grounding prong integrity).
      - 4.4.1.1.5 Inspect extension cords and equipment for loose parts and damaged cords.
      - 4.4.1.1.6 Portable GFCI's - Test per manufacturer's specifications.
    - 4.4.1.2 Before using the tool, check workplace for nails, defects, or similar hazards/imperfections.

- 4.4.1.3 Attachment Plug/Connector Body/Cord; check for:
  - 4.4.1.3.1 General condition
  - 4.4.1.3.2 Cord grip tightness
  - 4.4.1.3.3 Grounding Prong integrity
  - 4.4.1.3.4 Polarization integrity
  - 4.4.1.3.5 Condition of outer cord jacket. Cord will not be spliced and must be replaced if outer jacket is damaged
  - 4.4.1.3.6 Boot and visible parts of body for damage, loose parts, or deterioration
  - 4.4.1.3.7 Portable lights-check
  - 4.4.1.3.8 Handle, guard and other visible parts for damage, loose parts or deterioration
  - 4.4.1.3.9 Lamp (should be rough-service type)
  - 4.4.1.3.10 Low voltage lights (12 volts) to ensure that transformer has not been by-passed. Check lamp voltage rating.

## 4.5 In-Use Safety

- 4.5.1 Dress appropriately for the job
  - 4.5.1.1 Do not wear loose clothing or dangling jewelry.
  - 4.5.1.2 Confine long hair in a hair-net, cap, or fasten securely to the back of the head.
  - 4.5.1.3 Use extreme care when wearing gloves.
  - 4.5.1.4 Safety glasses are the minimum requirement when using any tool; additional PPE requirements may be necessary depending upon tool being used and job application (e.g., face shield, side shields, goggles, etc.)
  - 4.5.1.5 Use hearing protection if required.
- 4.5.2 Use all tools per manufacturer's recommendations.
- 4.5.3 Keep cutting tools in good condition. Sharpen/replace when necessary.

- 4.5.4 Never use fingers to pull or dislodge chips or turnings from tools or parts. Use pliers, rakes, or hooks.
  - 4.5.5 In some areas, compressed gas lines have been installed for specific uses. Be sure that air powered tools are hooked up only to lines supplied for the purpose.
  - 4.5.6 Do not set down or carry a portable power tool in any way so that the starting-trigger or button can be accidentally struck.
  - 4.5.7 Appropriate precautions will be utilized when tools are used in a wet location (e.g., electrically insulated gloves).
- 4.6 Post-Use Safety
- 4.6.1 Disconnect tools when not in use.
  - 4.6.2 Never lubricate, clean, repair, or adjust a tool while it is connected to a power source.
  - 4.6.3 After a job is finished, clean all scrap and debris from the work table and surrounding area. Use proper receptacles.
  - 4.6.4 Take care of all tools. Keep them sharp and clean. Follow manufacturer's instructions for lubricating, changing accessories, and inspection.
- 4.7 Repair
- 4.7.1 All electric tool repairs will be made by a factory authorized tool repair service or company designated portable power tool repair service.
  - 4.7.2 The only exception is cord plugs and connector bodies that may be replaced by a qualified person with an electrical background. Upon completion of plug or body replacement, ground integrity will be tested.
  - 4.7.3 No repairs will be made to portable GFCIs.

## **5. Safety Information**

### **5.1 Specialized Applications**

- 5.1.1 Hand and power tools that may generate sparks or high temperatures will not be used in areas that are hazardous due to the presence of flammable or combustible materials. Use of non-sparking tools will be required unless monitoring ensures levels below 25% of the lower explosive limit (LEL). For more information, reference Portable Electronic Devices in Hazardous Areas.
- 5.1.2 Training for use of a powder actuated tool is provided by the manufacturer (usually HILTI).

- 5.1.2.1 A license is issued after training; individuals using powder actuated tools must have the license on their person when using the tool.
- 5.1.2.2 A record of training will be kept in personnel training files or equivalent recordkeeping system.

## 5.2 Power Tool Precautions

- 5.2.1 Power tools can be hazardous when improperly used. The company uses several types based on the power source they use such as electric, liquid fuel, hydraulic, pneumatic, and powder-actuated. The following precautions will be taken by employees to prevent injury.
  - 5.2.1.1 Power tools will always be operated within their design limitations.
  - 5.2.1.2 Eye protection, gloves, and safety footwear are recommended during operation.
  - 5.2.1.3 Store tools in an appropriate dry location when not in use.
  - 5.2.1.4 Work only in well illuminated locations.
  - 5.2.1.5 Tools will not be carried by the cord or hose.
  - 5.2.1.6 Cords or hoses will not be yanked to disconnect it from the receptacle.
  - 5.2.1.7 Cords and hoses will be kept away from heat, oils, and sharp edges or any other source that could result in damage.
  - 5.2.1.8 Tools will be disconnected when not in use, before servicing, and when changing accessories such as blades, bits, and cutters.
  - 5.2.1.9 Observers will be kept at a safe distance at all times from the work area.
  - 5.2.1.10 Work will be secured with clamps or a vice where possible to free both hands to operate tools.
  - 5.2.1.11 To prevent accidental starting, employees should be continually aware not to hold the start button while carrying a plugged in tool.
  - 5.2.1.12 Tools will be maintained in a clean manner and properly maintained in accordance with the manufacturer's guidelines.
  - 5.2.1.13 Ensure that proper shoes are worn and that the work area is kept clean to maintain proper footing and good balance.
  - 5.2.1.14 Ensure that proper apparel is worn. Loose clothing, ties, or jewelry can become caught in moving parts.

- 5.2.1.15 Tools that are damaged will be removed from service immediately and tagged "Do Not Use". They will be reported and turned over to the job site supervisor or Safety Officer for repair or replacement.
- 5.2.1.16 Cracked saws. All cracked saws will be removed from service.
- 5.2.1.17 Grounding. Portable electric power tools will meet the electrical requirements of this safety program and 29 CFR 1910.331 - 335.
- 5.2.1.18 Compressed air used for cleaning. Compressed air will not be used for cleaning purposes except where reduced to less than 30 p.s.i. and then only with effective chip guarding and personal protective equipment.

### 5.3 Methods of Guarding

5.3.1 One or more methods of guarding will be provided where required to protect the operator and other employees in the area from hazards such as those created by point of operation, in-running nip points, rotating parts, flying chips and sparks. Examples of guarding methods are barrier guards, two-hand tripping devices, electronic safety devices, etc. The guard will be such that it does not offer an accident hazard in itself. Employees will:

- 5.3.1.1 Inspect tools without guards for signs of guard removal. If it is evident that a guard is required, tag-out the tool and obtain a replacement. Tools will not be energized during inspection.
- 5.3.1.2 Inspect tools having guards for proper operation and maintenance prior to use. Tools will not be energized during inspection.
- 5.3.1.3 Never remove a guard during use.

### 5.4 Self Assessment:

Each division/work unit should conduct a self-assessment to assess compliance with this standard and develop action plans to correct deficiencies. See Section 6 for more information.

## 6. Training and Information

### 6.1 Powder Actuated Tools

- 6.1.1 Users of powder-actuated tools must be licensed and trained.
- 6.1.2 Training may be conducted as part of an apprenticeship program or in other recognized training forums.
- 6.1.3 Employees who indicate they have had prior training will be required to demonstrate understanding and capabilities prior to being assigned to work.



6.1.4 Manufacturer's instructions will be retained for training/reference purposes.

## 6.2 Initial and Re-Training

6.2.1 This safety program will be provided to and read by all employees receiving training. Training will be conducted on an as needed basis or when the following conditions are met:

6.2.1.1 Re-training will be provided for all authorized and affected employees whenever (and prior to) there being a change in their job assignments, a change in the type of tools used, or when a known hazard is added to the work environment.

6.2.1.2 Additional re-training will also be conducted whenever a periodic inspection reveals (or whenever there is sufficient reason to believe) there are deviations from or inadequacies in the employee's knowledge or use of tools.

6.2.1.3 The re-training will reestablish employee proficiency and introduce new or revised methods and procedures, as necessary.

## 6.3 Verification

The company will verify that employee training has been accomplished and is being kept up to date. The documentation will contain each employee's name and dates of training.

## 7. Definitions

- *Powder Actuated Tools* – A tool that uses an explosive charge to drive a bolt or nail. Normally used in concrete construction or steel erection. Electrically powered nail guns are not considered a powder actuated tool.

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# HAND AND PORTABLE POWER TOOL GUARDING AND SAFETY REQUIREMENTS

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Portable Circular Saws  
Power Abrasive Wheel Tools  
Vertical Portable Grinders  
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Power Lawn Mowers  
Jacks

- **Portable Circular Saws**

- All portable, power-driven circular saws having a blade diameter greater than 2 in. will be equipped with guards above and below the base plate or shoe.
- The upper guard shall cover the saw to the depth of the teeth, except for the minimum arc required to permit the base to be tilted for bevel cuts. (Does not apply to circular saws used in the meat industry for meat cutting purposes).
- For authorized use the following conditions must be met.
  - An upper guard must cover the entire blade of the saw.
  - A retractable lower guard must cover the teeth of the saw.
  - Except when it makes contact with the work material, the lower guard must automatically return to the covering position when the tool is withdrawn from the work.

- **Power Abrasive Wheel Tools**

- Abrasive wheels shall be used only on tools/equipment provided with safety guards. (A safety guard is an enclosure designed to restrain the pieces of the grinding wheel and furnish all possible protection in the event that the wheel is broken in operation.)
  - Exceptions. These requirements do not apply to the following classes of wheels and conditions:
    - Wheels used for internal work while within the work being ground.
    - Mounted wheels used in portable operations 2 inches and smaller in diameter. Mounted wheels, usually 2 inch diameter or smaller, and of various shapes, may be either organic or inorganic bonded abrasive wheels. They are secured to plain or threaded steel mandrels. (Organic wheels are wheels which are bonded by means of an organic material such as resin, rubber, shellac, or other similar bonding agent.)
    - Types 16, 17, 18, 18R, and 19 cones, and plugs, and threaded-hole pot balls where the work offers protection.
  - Guard covers. Employees will ensure that a safety guard covers the spindle end, nut, and flange projections. The safety guard shall be mounted so as to maintain proper alignment with the wheel and the strength of the fastenings shall exceed the strength of the guard.
    - Exception. Safety guards on all operations where the work provides a suitable measure of protection to the operator may be so constructed that the spindle end, nut, and outer flange are exposed. Where the nature of the work is such as to entirely cover the side of the wheel, the side covers of the guard may be omitted.
    - Exception. The spindle end, nut, and outer flange may be exposed on portable machines designed for and used with type 6, 11, 27, and 28 abrasive wheels, cutting off wheels, and tuck pointing wheels. (Tuck pointing wheels, usually Type 1, are reinforced organic bonded wheels which have diameter, thickness and hole size dimension. They are subject to the same limitations of use and mounting as Type 1 wheels. Limitation: Wheels used for tuck pointing should be reinforced, organic bonded. Tuck pointing is the removal, by grinding, of cement, mortar, or other nonmetallic jointing material. The term reinforced as applied to grinding wheels shall define a class of organic wheels which contain strengthening fabric or filament. The term reinforced does not cover wheels using such mechanical additions as steel rings, steel cup backs or wire or tape winding.)
    - Type 1 straight wheels have diameter, thickness, and hole size dimensions and should be used only on the periphery. Type 1 wheels shall be mounted between flanges. Limitation: Hole dimension (H) should not be greater than two-thirds of wheel diameter dimension (D) for precision, cylindrical, center-less, or surface grinding applications. Maximum hole size for all other applications should not exceed one-half wheel diameter.

- Cup wheels. Cup wheels (Types 6 and 11) shall be protected by:
  - Safety guards as specified.
  - Special "revolving cup guards" which mount behind the wheel and turn with it. They shall be made of steel or other material with adequate strength and shall enclose the wheel sides upward from the back for one-third of the wheel thickness. The mounting features shall conform to all regulations. It is necessary to maintain clearance between the wheel side and the guard. The clearance shall not exceed one-sixteenth.
  - Type 6 cup wheels have specific diameter, thickness, hole-sizes, rim thickness, and back thickness dimensions. Grinding is always performed on rim face, W dimension. Limitation: Minimum back thickness, E dimension, should not be less than one-fourth T dimension. In addition, when unthreaded hole-wheels are specified, the inside flat, K dimension, must be large enough to accommodate a suitable flange.
  - Type 11 flaring cup wheels have double diameter dimensions D and J, and in addition have thickness, hole size, rim and back thickness dimensions. Grinding is always performed on rim face, W dimension. Type 11 wheels are subject to all limitations of use and mounting listed for Type 6 straight sided cup wheels definition
- General safety precautions.
  - Before being mounted it should be inspected closely and sound- or ring- tested to be sure that it is free from cracks or defects. To test, wheels should be tapped gently with a light non-metallic instrument. If they sound cracked or dead they could fly apart in operation and so must not be used. A sound and undamaged wheel will give a clear metallic tone or ring.
  - Employees will not locate themselves directly in front of the wheel as it accelerates to full operating speed.
  - Employees will always use eye protection.
  - Power will be turned off when not in use.
  - Hand held grinders are never placed in vises.
  - Mounting and inspection of abrasive wheels.
    - Immediately before mounting, all wheels shall be closely inspected and sounded by the user using the ring test to make sure they have not been damaged in transit, storage, or otherwise. The spindle speed of the machine shall be checked before mounting of the wheel to be certain that it does not exceed the maximum operating speed marked on the wheel.
    - Grinding wheels shall fit freely on the spindle and remain free under all grinding conditions. A controlled clearance between the wheel hole and the machine spindle (or wheel sleeves or adaptors) is essential to avoid excessive pressure from mounting and spindle expansion. To accomplish this, the machine spindle shall be made to nominal (standard) size plus zero minus .002 inch, and the wheel hole shall be made suitably oversize to assure safety clearance under the conditions of operating heat and pressure.
    - All contact surfaces of wheels, blotters, and flanges shall be flat and free of foreign matter.
    - When a bushing is used in the wheel hole it shall not exceed the width of the wheel and shall not contact the flanges.
    - Excluded machinery. Natural sandstone wheels and metal, wooden, cloth, or paper discs having a layer of abrasive on the surface are not covered by these requirements.

- **Vertical Portable Grinders**

- Supervisors will ensure all employees are thoroughly familiar with and use strict work practices in accordance with the manufacturer instructions. Safety guards used on machines known as right angle head or vertical portable grinders shall have a maximum exposure angle of 180 and the guard shall be located between the operator and the wheel during use. Adjustment of guard shall be such that pieces of an accidentally broken wheel will be deflected away from the operator. (See 29 CFR 1910.243, Figure P-4.)
- Other portable grinders. The maximum angular exposure of the grinding wheel periphery and sides for safety guards used on other portable grinding machines shall not exceed 180 and the top half of the wheel shall be enclosed at all times.
- Portable grinding is a grinding operation where the grinding machine is designed to be hand held and may be easily moved from one location to another.

- **Portable Belt Sanding Machines**

- Supervisors will ensure that all belt sanding machines used by their personnel be provided with guards at each nip point where the sanding belt runs onto a pulley. These guards will effectively prevent the hands or fingers of the operator from coming in contact with the nip points. The unused run of the sanding belt shall be guarded against accidental contact.

- **Pneumatic Power Tools and Hoses**

- Supervisors will ensure all employees are thoroughly familiar with and use strict work practices in accordance with the manufacturer instructions. Prior to use the following requirements will be complied with:
- Tool retainer. A tool retainer will be installed on each piece of utilization equipment which, without such a retainer, may eject the tool.
- Air-hoses. Hose and hose connections used for conducting compressed air to utilization equipment will be compatible with the pressure and service to which they are subjected.

- **Explosive Actuated Fastening Tools**

- General safety precautions: Supervisors will ensure all employees are thoroughly familiar with and use strict work practices in accordance with the manufacturer instructions.
  - Operators and assistants using tools shall be safeguarded by wearing eye protection.
  - Head and face protection shall be used as required by working conditions.
  - Before using a tool, the employee will inspect it to determine to his satisfaction that it is clean, that all moving parts operate freely, and that the barrel is free from obstructions.
  - When a tool develops a defect during use, the operator shall immediately cease to use it until it is properly repaired.
- Tools will not be loaded until just prior to the intended firing time. Neither loaded nor empty tools are to be pointed at any workmen.
- No tools shall be loaded unless being prepared for immediate use and will not be left unattended.
- Misfire instructions (general).
  - Know the manufacturers instructions.
  - Hold the tool in the operating position for at least 30 seconds.
  - Try to operate the tool a second time.
  - Wait another 30 seconds, holding the tool in the operating position; then proceed to remove the explosive load in strict accordance with the manufacturer instructions.
- A tool will never be left unattended in a place where it would be available to unauthorized persons.
- Fasteners will not be driven into very hard or brittle materials including but not limited to cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.
- Driving into materials easily penetrated will be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying-missile hazard on the other side.
- Low-velocity tools. Only tools meeting the design specifications of 29 CFR 1910.243 will be used. Employees contemplating purchase of low-velocity tools will consult the OSHA Regulatory Standard before final tool selection. The manufacturer's inspection criteria will be followed for pre-use inspection.
- Low-velocity piston type tools. Only tools meeting the design specifications of 29 CFR 1910.243 will be used. Employees contemplating purchase of low-velocity piston type tools will consult the OSHA Regulatory Standard before final tool selection. The manufacturer's inspection criteria will be followed for pre-use inspection.
  - A low-velocity piston tool is a tool that utilizes a piston designed to be captive to drive a stud, pin, or fastener into a work surface. It will not cause such stud, pin, or fastener to have a mean velocity in excess of 300 feet per second when measured 6.5 feet from the muzzle end of the barrel.
  - Fasteners will not be driven directly into materials such as brick or concrete closer than 3 inches from the unsupported edge or corner or into steel surfaces closer than one-half inch from the unsupported edge or corner, unless a special guard, fixture, or jig is used. (Exception: Low-velocity tools may drive no closer than 2 inches from an edge in concrete or one-fourth inch in steel.)
  - When fastening other materials, such as a 2X4 inch wood section to a concrete surface, it is permissible to drive a fastener of no greater than 7/32 inch shank diameter not closer than 2 inches from the unsupported edge or corner of the work surface.
  - Fasteners will not be driven through existing holes without positive guides for accurate alignment.
  - No fastener will be driven into a spalled area caused by an unsatisfactory fastening.
  - Tools will not be used in an explosive or flammable atmosphere.
  - All tools will be used with the correct shield, guard, or attachment recommended by the manufacturer. Protective shields or guards are devices or guards attached to the muzzle end of the tool, which is designed to confine flying particles
  - Any tool found not in proper working order will be immediately removed from service and turned over to the job site supervisor for repair in accordance with the manufacturer's specifications.

- High-velocity tools. Only tools meeting the design specifications of 29 CFR 1910.243 will be used. Employees contemplating purchase of high-velocity tools will consult the OSHA Regulatory Standard before final tool selection. The manufacturer's inspection criteria will be followed for pre-use inspection.

- High-velocity tools are tools or machines which, when used with a load, propels or discharges a stud, pin, or fastener, at velocities in excess of 300 feet per second when measured 6.5 feet from the muzzle end of the barrel, for the purpose of impinging it upon, affixing it to, or penetrating another object or material. (A stud, pin, or fastener is a fastening device specifically designed and manufactured for use in explosive-actuated fastening tools.)

- A hammer-operated piston tool--low-velocity type, is a tool which, by means of a heavy mass hammer supplemented by a load, moves a piston designed to be captive to drive a stud, pin, or fastener into a work surface, always starting the fastener at rest and in contact with the work surface.

- **Power Lawnmowers**

- Supervisors will ensure all employees are thoroughly familiar with and use strict work practices in accordance with the manufacturer instructions. General requirements:
- Power lawnmowers will have power-driven chains, belts, and gears so positioned or otherwise guarded to prevent the operator's accidental contact therewith during normal starting, mounting, and operation of the machine.
- A shutoff device will be provided to stop operation of the motor or engine. This device will require manual and intentional reactivation to restart the motor or engine.
- All positions of the operating controls will be clearly identified.
- The words "Caution. Be sure the operating control(s) is in neutral before starting the engine" shall be clearly visible at an engine starting control point on self-propelled mowers.
- The mower blade will be enclosed except on the bottom and the enclosure shall extend to or below the lowest cutting point of the blade in the lowest blade position.
  - Guards which must be removed to install a catcher assembly will be affixed to the mower near the opening stating that the mower will not be used without either the catcher assembly or the guard in place.
  - The word "Caution" (or stronger wording) will be placed on the mower at or near each discharge opening.
  - Proper precautions will be taken when refueling mowing equipment.
  - Mowing equipment will never be left unattended while running.
  - Will constantly be mindful of persons working near the operation of the mower.

- **Jacks**

- Jack. A jack is an appliance for lifting and lowering or moving horizontally a load by application of a pushing force. Jacks may be either lever and ratchet or screw and hydraulic types.
- The operator will make sure that the jack used has a rating sufficient to lift and sustain the load. The rating of a jack is the maximum working load for which it is designed to lift safely that load throughout its specified amount of travel.
  - To raise the rated load of a jack, the point of application of the load, the applied force, and the length of lever arm should be those designated by the manufacturer for the particular jack considered.
- The rated load will be legibly and permanently marked in a prominent location on the jack by casting, stamping, or other suitable means.
- In the absence of a firm foundation the base of the jack will be blocked. If there is a possibility of slippage of the cap, a block shall be placed in between the cap and the load.
- The operator will watch the stop indicator, which shall be kept clean, in order to determine the limit of travel. The indicated limit will never be overrun.
- After the load has been raised, it will be cribbed, blocked, or otherwise secured at once.
- Hydraulic jacks exposed to freezing temperatures shall be supplied with adequate antifreeze liquid.
- All jacks shall be properly lubricated at regular intervals.

# TRAINING ATTENDANCE ROSTER HAND AND PORTABLE POWER TOOLS

***Hand and Portable Power Tool Training Includes:***

- General Requirments
- Types of Tools
- Hazards
- Protection and Guarding
- Abrasive, Electric, Pneumatic and Powder Actuated Tools, and Jacks

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
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NAME (Please Print) FIRST - MI - LAST	SIGNATURE
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By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed


Name of Interpreter, if utilized: \_\_\_\_\_

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## PROGRAM OVERVIEW

# HAZARD COMMUNICATION SAFETY PROGRAM

REGULATORY STANDARD: OSHA - 29 CFR 1910.1200

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## INTRODUCTION

The Hazard Communication Standard requires employers to inform employees of the hazards and identities of workplace chemicals to which they are exposed. This program specifies the requirements for evaluation of chemical hazards in the workplace and establishes means for communicating hazard information to all affected workers including chemical Safety Data Sheets (SDS), labeling, a Written Hazard Communication Program, employee training and communication requirements for contractors and vendors.

## TRAINING

- Employees and contractors must be made aware of the hazards they may encounter and the precautions they must take to protect themselves from these hazards.
- Employees or contractors must be trained on initial assignment and whenever any new physical, chemical or health hazards are introduced, when non-routine tasks or procedures are required, or when employees are working with or near unlabeled piping systems that contain hazardous chemicals.

## ACTIVITIES

- Determine if hazardous chemicals are present in the workplace
- Ensure the availability of a SDS for each hazardous chemical or mixture in the workplace
- Ensure a Hazardous Chemical List is maintained
- Evaluate the hazards for each chemical or mixture used and/or stored in the workplace
- Ensure proper labeling of chemical containers in accordance with Globally Harmonized System (GHS) requirements.
- Complete the Written Hazard Communication Program
- Employees trained
- Process to evaluate and document any new hazards or changes

## FORMS

- Hazardous Chemical List
- Training Attendance Roster
- Written Hazard Communication Program

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training Information & Requirements
7. Definitions

# HAZARD COMMUNICATION PROGRAM

1. **Purpose.** To provide an effective, written hazard communication program in compliance with company, State and Federal regulatory requirements. Hazard Communication applies to all chemicals and mixtures purchased, manufactured, used, and/or stored by the company to which employees, contractors, tenants or visitors may be exposed. (Laboratories, as defined by OSHA regulations, are not covered under this program.)
2. **Scope.** This program applies to all operations at company facilities and job-sites. This program does not apply to articles, food or beverage items. Consumer products are exempt if they are used at the same frequency, duration, and concentration as home use.
3. **Responsibilities.**

## 3.1 Management must:

- 3.1.1 Perform a hazard determination. The company is required to determine the hazards of any products or chemicals they manufacture and/or sell.
- 3.1.2 Ensure a Hazardous Chemical List is maintained either for the company as a whole, or for each department or work area.
- 3.1.3 Evaluate the hazards for each chemical or mixture used or stored in the workplace.
- 3.1.4 Maintain a Written Hazard Communication Program.
- 3.1.5 Assure labels and other forms of warning are affixed to chemical containers, as appropriate, meeting Globally Harmonized System (GHS) label requirements.
- 3.1.6 Train and inform employees on initial assignment and whenever a new physical, chemical or health hazard is introduced into the workplace, or when non-routine tasks or procedures are required.
- 3.1.7 Develop and implement a method of communication between any contractors and the company which describes and outlines.

## 3.2 Employees must:

- 3.2.1 Attend Hazard Communication Training upon initial assignment, and when changes to the workplace hazards occur (through process changes or a change of work assignment).
- 3.2.2 Re-label any containers into which hazardous chemicals or mixtures are transferred.

3.2.3 Inform management of any changes to chemicals or chemical uses.

#### 4. Procedure.

4.1 Determine if hazardous chemicals are present in the workplace.

4.2 Written Hazard Communication Program (See the included form for the Written Hazard Communication Program.) This program must contain or describe:

4.2.1 A list of hazardous chemicals

4.2.2 Criteria and Label information

4.2.3 Safety Data Sheets (SDS)

4.2.4 Employee information and training

4.2.5 Procedures for evaluating the hazards of any non-routine tasks (e.g. one-time chemical uses) and for evaluating any unlabeled pipes in the work area that contain hazardous chemicals.

4.2.6 Multi-employer workplaces (Provisions for contractors)

4.3 Hazardous Chemical List (See the included Form for a Hazardous Chemical List)

Create a list of all hazardous chemicals used in the workplace. If necessary, use the chemical SDSs to determine whether or not a chemical is a hazardous chemical.

4.4 Chemical Labeling

4.4.1 Manufacturer/GHS Compliant labeling: All containers must be labeled with the product identifier, signal word, hazard statement, pictogram(s), precautionary statement, and manufacturer name, address, and phone number. Such labels may not be defaced or covered.

4.4.2 Workplace labeling: May be used for process materials and must contain the chemical identity and appropriate hazard warnings.

4.4.3 Portable Container labels: should be on all containers at all times. However, labels are not required for portable containers provided they are immediately used by the employee on that work-shift *and* remain in the direct control of the employee at all times.

4.4.4 All labels must be in legible English. Other languages may be used, provided a label in English is also provided.

- 4.4.5 Pipes or piping systems that contain a hazardous chemical shall be identified to employees by at least one (1) readily accessible label, sign, placard, written operating instructions, process sheet, batch ticket or substance identification system.

#### 4.5 Safety Data Sheets

- 4.5.1 Ensure the availability of a SDS for each hazardous chemical or mixture in the workplace and are:

- 4.5.1.1 Readily accessible and available by employees on each work shift

- 4.5.1.2 Written in English

- 4.5.1.3 Obtained from the manufacturer or supplier of the chemical or material before it is used at the workplace, if one did not accompany the shipment

- 4.5.1.4 Kept for the duration of its use or storage, at a minimum, and for 30 years after discontinuing chemical use.

- 4.5.2 SDSs are prepared by the chemical manufacturer following the GHS requirements.

#### 4.6 Multi-employer workplaces (Provisions for contractors) must be informed about:

- 4.6.1.1 Onsite access to and maintenance of a current SDS

- 4.6.1.2 Labeling procedures

- 4.6.1.3 Protective and precautionary measures

- 4.7 Maintain a process to evaluate and document any new hazards or changes to the workplace that would affect the above requirements, including any non-routine tasks or procedures, or unlabeled piping systems that contain hazardous chemicals.

### 5. **Safety Information**

Trade Secret Information - Trade Secrets are products which, when the chemical identity of the product is revealed, would jeopardize the manufacturer's competitive advantage. Trade secret materials (and requests to reveal trade secret information) must comply with the requirements of OSHA 1910.1200(i) and Appendix D.

### 6. **Training and Information**

- 6.1 Employees must be trained on initial assignment and whenever any new physical, chemical or health hazards are introduced, when non-routine tasks or procedures are required, or when employees are working with or near unlabeled piping systems that contain hazardous chemicals.

## 6.2 Training includes

- 6.2.1 Identification of the work areas where hazardous chemicals are used.
- 6.2.2 The location and availability of the written program, hazardous chemical list, and SDSs.
- 6.2.3 Information on the methods and observations used to detect the presence or release of chemicals (monitors, alarm systems, odors, visual appearance, etc.) including any “non-routine” tasks that employees may be asked to periodically perform which are beyond their regularly assigned duties.
- 6.2.4 The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazard information of the chemicals present
- 6.2.5 The measures employees can take to protect themselves from identified chemical hazards (procedures, personal protective equipment, etc.)
- 6.2.6 The labeling system used in the workplace
- 6.2.7 The details of the Written Hazard Communication Program

## 7. Definitions

- *Hazard Statement* - statement assigned to a hazard class and category that describes the nature of the hazard(s) of a chemical, including, where appropriate, the degree of hazard.
- *Laboratory* - A facility where relatively small quantities of hazardous chemicals are used on a non-production basis. The following conditions must be met:
  - Chemical manipulations are carried out on a "laboratory scale"
  - Multiple chemical procedures or chemicals are used
  - The procedures involved are not part of a production process, nor in any way simulate a production process
  - "Protective laboratory practices and equipment" are available and in common use to minimize the potential for employee exposure to hazardous chemicals
- *Pictogram* - a composition that may include a symbol plus other graphic elements, such as a border, background pattern, or color, that is intended to convey specific information about the hazards of a chemical. Eight pictograms are designated under this standard for application to a hazard category.
- *Precautionary statement*- a phrase that describes recommended measures that should be taken to minimize or prevent adverse effects resulting from exposure to a hazardous chemical, or improper storage or handling.
- *Process Materials* - Chemicals that are routinely used in a chemical process or as part of a mixture for a chemical process.

- *Product Identifier* - the name or number used for a hazardous chemical on a label or in the SDS. It provides a unique means by which the user can identify the chemical.
- *Safety Data Sheets (SDS)* - reference documents that outline the product information, hazards and other required elements for hazardous chemicals or materials. These documents are produced by the manufacturer of the chemical or material and must be maintained at any workplace where they are used or stored.
- *Signal Word* – a word used to indicate the relative level of severity of hazard and alert the reader to a potential hazard on the label. The signal words used in this section are "danger" and "warning." "Danger" is used for the more severe hazards, while "warning" is used for the less severe.

# HAZARDOUS CHEMICAL LIST

<b>Name of Chemical</b> (as it appears on the SDS or Chemical Label)	<b>Common Name</b> (what this company calls the material – if different than the SDS)	<b>Manufacturer or Supplier Name</b>	<b>Manufacturer Emergency Contact Information Or Phone Number</b>

Completed by: \_\_\_\_\_ Date: \_\_\_\_\_



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# WRITTEN HAZARD COMMUNICATION PROGRAM

The purpose of this written program is to document how the Hazard Communication requirements are met.

## **General:**

\_\_\_\_\_ is responsible for the initial and ongoing activities to keep this Hazard Communication Program current.

The location of the written program is: \_\_\_\_\_

The location of the list of hazardous chemicals is: \_\_\_\_\_

The location of the Safety Data Sheets (SDSs) is: \_\_\_\_\_

The list of hazardous chemicals, the written program, and the SDSs are required to be accessible to employees at all times. If electronic access is provided, describe the process for accessing this information: \_\_\_\_\_.

If an SDS is not received at the time of purchase or shipment, an SDS will be obtained either through the manufacturer's website, by calling the manufacturer or supplier, or by writing the company. If the SDS is not available, OSHA may be contacted or notified.

\_\_\_\_\_ is responsible for ensuring that SDSs are received.

## **Hazard Warning Labels:**

Original manufacturer's labels are generally used to ensure updated information on chemical hazards is made available.

\_\_\_\_\_ is responsible for ensuring that all hazardous chemicals in the workplace have appropriate labels (original manufacturer's labels, or written/printed labels (such as HMIS, NFPA or NAFTA code labels) affixed by our company. If alternative systems to the hazard warning statements are used, describe the system used: \_\_\_\_\_.

\_\_\_\_\_ is responsible for ensuring any containers shipped or taken off our company premises have appropriate labels, which include the identity of the chemical, appropriate hazard warning statements, and the name and address of manufacturer or responsible party.

## **SDS for Company Made or Manufactured Chemicals:**

\_\_\_\_\_ is responsible for ensuring that SDSs are created and written for every hazardous chemical that the company makes, mixes or manufactures.

\_\_\_\_\_ is responsible for ensuring that any SDSs are shipped to another company who purchases or is provided with our company-specific chemicals or mixtures.

**Non-Routine Tasks and Unlabeled Pipes:**

\_\_\_\_\_ is responsible for ensuring that any **new or non-routine tasks** are identified and training is appropriately provided. SDSs and chemical label reviews are used as part of this hazard evaluation and identification.

The methods used to inform employees of the hazards of **non-routine tasks**, and the hazards associated with chemicals contained in **unlabeled pipes** in their work areas are as follows:

**Contractors:**

\_\_\_\_\_ is responsible for supplying an SDS, upon request. Contractors working at our sites or locations will be provided with an SDS for any chemical used or stored at the facility, upon request. Describe the methods used to provide on-site access to SDS:

Describe how you communicate information about your labeling system, if different than that used by contractors or subcontractors for types of labeling: \_\_\_\_\_

Methods used to inform any precautionary measures that need to be taken to protect employees during the workplace's normal operating conditions and in foreseeable emergencies: \_\_\_\_\_

**Off-Site Work:**

Employees working at other sites may request an SDS for any chemical they may be exposed to. During training or orientation, our employees are informed of how to request information on the elements of that location's written hazard communication program, including Safety Data Sheet information, labeling, non-routine work hazards and unlabeled pipes.

\_\_\_\_\_ is responsible for ensuring that this occurs, as needed.

**Information and Training:**

\_\_\_\_\_ is responsible for identifying employees who need training.

\_\_\_\_\_ is responsible for conducting training upon initial assignment.

The hazard communication training must cover the following items, at a minimum:

- Information on the operations where hazardous chemicals are present
- The location and availability of this written program, list of hazardous chemicals, and SDS
- How to detect releases of hazardous chemicals (monitoring equipment, visual determination, odor, equipment sensors, etc).
- The physical and health hazards of chemicals in the work area, including any unlabeled chemical pipes.
- The measures that employees can take to protect themselves from these hazards.

The details of the Hazard Communication Program, including the explanation of the labeling system and SDS.

\_\_\_\_\_ is responsible for ensuring that these elements are covered in the training program.

Completed by: \_\_\_\_\_

Date: \_\_\_\_\_

# Personal Protective Equipment

## PROGRAM OVERVIEW

# PERSONAL PROTECTIVE EQUIPMENT SAFETY PROGRAM

REGULATORY STANDARD: 29 CFR §1910.132-138

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## INTRODUCTION

Personal protective equipment (PPE), when its use is required, must be provided and used by employees. PPE should only be used where engineering and work practice controls are not sufficient to prevent exposure to a hazard. The type of personal protective equipment and the reasons for its use must be documented. Where required, employees must be trained in how to use the equipment, reasons for its use, the care and maintenance of the equipment and disposal considerations.

## TRAINING

- Training and information is required for employees who use PPE.
- Additional training is required for specific types and uses of PPE (respirators, hearing protection, etc.)

## ACTIVITIES

- Conduct and document a Hazard Assessment
- Provide protective equipment, as required
- Ensure employees are trained in the use, care and maintenance of the equipment

## FORMS

- Certification of Hazard Assessment
- Information for Filtering Facepiece (Dust Mask) Use
- Training Attendance Roster

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

# PERSONAL PROTECTIVE EQUIPMENT (PPE) SAFETY PROGRAM

**1. Purpose.** Personal Protective Equipment (PPE) shall be used in areas where there is potential exposure to hazards which cannot be adequately controlled by elimination, substitution, engineering methods or administrative controls. PPE is to be considered the last line of defense against exposure to chemical hazards, radiation hazards, biological agents, temperature extremes, noise, electrical energy, mechanical forces, irritants, or projectiles which can produce injury or illness. This defines the required elements for implementing a PPE program.

1.1 Exclusions: PPE requirements for hearing conservation, fall protection, cartridge type respiratory protection, eyewash/safety shower, and electrical work are covered in separate, specific standards. Back Belts and Wrist Braces used in mitigation of ergonomic disorders as part of an ergonomics evaluation are not considered PPE.

**2. Scope.** Applies to any area where Personal Protective Equipment is required or used by company employees.

## **3. Responsibilities**

### 3.1 Management

3.1.1 Conduct and document a Hazard Assessment of the workplace.

3.1.2 Select the appropriate PPE to reduce or eliminate hazards, based on the types of tasks and activities performed at the company.

3.1.3 Maintain PPE or provide employees with the proper training and tools to maintain PPE used at the company.

3.1.4 Best practice is to post signs to inform employees where PPE is required.

3.1.5 Provide appropriate protective equipment to employees, visitors or other personnel, as needed or required. The employer is not required to pay for steel-toe shoes and prescription safety glasses (if allowed to be worn off the job), logging boots, everyday clothing, normal work boots, winter coat, sunglasses, and sunscreen.

3.1.6 Provide training to each employee who is required to use PPE.

### 3.2 Employees

3.2.1 Wear PPE as required and trained.

3.2.2 Maintain PPE, as required by this program

3.2.3 Report concerns, issues or violations of this program to Supervisors or management.



## 4. Procedure

### 4.1 Certification of Hazard Assessment

- 4.1.1 Conduct a hazard assessment of the workplace to identify the hazards associated with each job task or facility.
- 4.1.2 A Certification of Hazard Assessment shall be completed as verification that a hazard assessment was performed. The "certification document" may be completed by job task or operation, for buildings, or for organizations. If you do not use the provided form for this purpose, your documentation must specifically be identified as a "Certification of Hazard Assessment", and contain all the required elements (person certifying, date, location evaluated)
  - 4.1.2.1 This document shall be updated for changes to operating procedures, when the method of performing the job changes and/or when incident investigations determine those PPE modifications are necessary.

### 4.2 PPE Selection

- 4.2.1 Obtain the appropriate PPE. Selected PPE may include: eye and face, hand and arm, foot, head, torso and body protection, etc.
  - 4.2.1.1 The type of PPE must protect against the hazards identified.
  - 4.2.1.2 Inform affected employees of the PPE they are required to wear.
  - 4.2.1.3 Selected PPE must fit each affected employee.
  - 4.2.1.4 For chemical protective clothing, manufacturer information is maintained by the company. For suits, gloves, apron, eyewear/goggles - generic chemical permeation data (what the item is resistant to or not resistant to for general groupings of chemicals) will be maintained.

### 4.3 Access to and Maintenance of PPE

- 4.3.1 Ensure adequate supplies, storage, and employee access to PPE when required for a specific work area or operation.
- 4.3.2 PPE must be maintained in a sanitary and reliable condition. Ensure that damaged or defective PPE is taken out of service and not used, and that contaminated clothing and PPE are disposed of or cleaned properly.

## 5. Safety Information

### 5.1 Types of PPE and Their Use(s)

#### 5.1.1 Eye and Face Protection

- 5.1.1.1 Safety glasses, goggles, and face shields are designed to protect the eyes and/or face of individuals who may be exposed to flying particles, molten metal, liquid chemicals, acid or caustic liquids, chemical gases or vapors, etc.
- 5.1.1.2 Only safety glasses and face protection meeting ANSI Z87 requirements shall be worn.
- 5.1.1.3 In special applications, such as welding or laser operations, helpers shall be protected to the same level as the operator.
- 5.1.1.4 Individuals, who work on or near exposed electrically energized circuit parts, at 50 volts and above, shall wear non-conductive eyewear. Non-conductive eyewear is also necessary for individuals exposed to electrical burn hazards (e.g.: working on systems less than 50 volts, but with high current levels such as electroplating systems, large capacity batteries, etc.). Metal frame glasses are not permitted for these activities.
- 5.1.1.5 Where contact lenses are permitted, they shall be worn with required PPE appropriate to the exposure. Safety non-prescription glasses shall be available to wearers of contact lenses.

#### 5.1.2 Gloves and Hand Protection

- 5.2.2.1 Gloves, gauntlets, and protective sleeves are designed to protect the hands and arms of individuals who may be exposed to skin contact and/or absorption of chemical or biological agents, cuts or lacerations, abrasions, punctures, chemical burns, thermal burns, or harmful temperature extremes. Materials used in the manufacture of clothing must be resistant to the chemicals or materials being handled.
- 5.2.2.2 Gloves shall be removed properly so as not to expose an unprotected hand or part of the arm.
- 5.2.2.3 After removing gloves, hands should be thoroughly washed with soap and water.
- 5.2.2.4 Disposable gloves shall be disposed of at the end of each use. Chemical contact, signs of physical wear, or loss of glove integrity shall require more frequent disposal.

5.2.2.5 Latex Gloves: Due to the increasing concerns with latex gloves and associated skin reactions, latex gloves may be selected based on latex content, protein content (usually <50ug/g) or other requirements based on employee needs. Gloves may be required to be powdered or powder-free, depending upon the needs of the business activities.

## 5.2.2 Foot Protection

5.2.3.1 Foot protection is designed to protect the foot when working in areas where there is a danger of foot injuries due to falling or rolling objects, objects piercing the sole, and exposure to electrical hazards.

5.2.3.2 Where safety shoes are required, only foot protection meeting ANSI Z41 requirements shall be worn.

5.2.3.3 Electricians should select shoes rated for electrical hazards and/or use insulating mats when working on or near energized equipment.

## 5.2.4 Head Protection

5.2.4.1 Head Protection is designed to provide protection against impact and penetration from falling or stationary objects. They also may provide protection against electrical shock and burns caused when coming in contact with energized parts.

5.2.4.2 Where head protection is required, only Head protection meeting ANSI Z89 requirements shall be worn.

### 5.2.4.3 Types of Head Protection

5.2.4.2.1 Hard Hats - There are two types and three classes of hard hats. The type and class used or required at the facility or site will be documented based on the hazards.

5.2.4.2.2 Bump Caps - Provide protection from impact against stationary objects but do NOT protect against impact or penetration from falling objects or electrical shock hazards.

5.2.4.2.3 Welding Helmets - Provide protection against ultraviolet, infrared, and visible radiation sources during welding operations.

5.2.4.2.4 Hair Nets/Hats - Protect employees from entanglement hazards (e.g. equipment with moving parts, etc.) This can be done with the use of hair restraining devices, such as hair nets, hats, etc.

## 5.2.5 Hearing Protection

- 5.2.5.2 Hearing Protection is designed to protect against the affects of noise exposure in the workplace.
- 5.2.5.3 Where noise levels equal or exceed an 8 hour time weighted average of 85 dba, a Hearing Conservation program must be implemented and hearing protection shall be made available to affected employees.
- 5.2.5.4 Employers shall ensure hearing protection is worn when:
  - 5.2.5.4.5 Employees are exposed to noise levels equal or exceed an 8 hour time weighted average of 90 dba.
  - 5.2.5.4.6 Any employee who is exposed to an 8 hour time weighted average of 85 dba or greater who has not had their baseline audiogram or has experienced a standard threshold shift.
- 5.2.5.5 Voluntary Use: Employers can offer hearing protection to employees for voluntary use where noise levels do not exceed the requirements specified above.

## 5.2.6 Protective Clothing

- 5.2.5.1 Clothing such as suits, aprons, coveralls, coats, and pants are available to protect the torso and body of individuals who may be exposed to skin absorption of chemical or biological agents, cuts or lacerations, abrasions, punctures, chemical burns, thermal burns, or harmful temperature extremes. Materials used in the manufacture of such clothing must be matched in resistance to the chemicals or materials being handled.
  - 5.2.5.2 Company provided clothing: Laundering of company-issued work clothing shall be provided by the company to avoid the need for employees to launder clothing at home whenever there is a potential for infectious material or chemical contamination such as asbestos, lead, cadmium, arsenic, sensitizers, etc.
- 5.2.5 Dust Mask (Filtering Facepiece) Protection – Voluntary Use: This section applies to employees at any company facility or job-site where the use of a dust mask is utilized for voluntary use by employees.
- 5.2.5.1 Required and voluntary use of a cartridge respirator or required use of a dust mask must comply with the Respiratory Protection standard.
  - 5.2.5.2 Dust mask will be packed or stored to prevent deformation of the face piece and/or exhalation valve.

5.2.5.3 The employer must provide employees with Information for Voluntary Respirator Use form or equivalent Appendix D from the OSHA standard.

### 5.3 Signs

5.3.5 Signs should be posted, as needed, to warn employees and other personnel when protective equipment is required.

5.3.6 Signs may read "Safety Glasses Required"; "DANGER – Eye/Face Hazard area – Do Not Enter Without Protective Equipment"; or "DANGER – Hard Hat Required Area" or similar language may be used.

## 6. Training and Information

6.1 Employees must be trained in the when PPE is necessary, what PPE is necessary, limitations, proper use, cleaning, storage and disposal practices for any PPE used in the workplace

6.2 Training must be documented.

6.3 Employees must demonstrate their understanding of the training and ability to properly use PPE before performing work. This can be done at the time of training (quizzes, classroom discussion, etc.) or through demonstration of work practices in the workplace.

6.4 Retraining will be performed when changes to the workplace necessitate different equipment or when changes to the type/design of the PPE are made which require a new skill or knowledge for its successful use. Retraining will also be done when an employee exhibits a lack of understanding or skill to use the equipment properly.

## 7. Definitions

- *Filtering facepiece (dust mask)* - A negative pressure particulate respirator with a filter as an integral part of the facepiece or with the entire facepiece composed of the filtering medium.
- *Personal Protective Equipment (PPE)* - Devices worn to protect employees from potential hazards encountered in the workplace.
- *Certification of Hazard Assessment* - Certification that the Hazard Assessment has been conducted.

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# CERTIFICATION OF HAZARD ASSESSMENT

This is to certify that an evaluation has taken place for the tasks and activities performed at this workplace, hazards have been identified as indicated, appropriate Personal Protective Equipment (PPE) has been issued, and its use enforced.

Area Assessed:		Assessment Date:	
Assessment Completed By:		Signature:	

Job Task	Identified Hazard	Required PPE

Examples of Types of PPE as determined applicable to the Job Hazard:

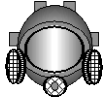
- Body Protection:* Chemical Apron, Arm/Sleeve Protection, Fire Resistive Clothing, Welding Apron, Tyvek Suits
- Eye/Face Protection:* Safety Glasses w/ Side shields, Goggles, Face Shield, Welding Shield
- Fall Protection:* PFAS, Lanyard, Harness
- Foot Protection:* Work Boots, Steel-toe shoes, Metatarsal Guards, Leather slip resistant shoes
- Hearing Protection:* Ear Muffs, Ear Plugs, Canal Caps
- Head Protection:* Bump Caps, Hard Hat, Hair nets
- Hand Protection:* Neoprene Gloves, Nitrile Gloves, Electrical Gloves, Heat Resistant Gloves, Leather Gloves
- Respiratory Protection:* Dust Mask, Cartridge Respirator, SCBA/Airline Respirator

Examples of Hazards (add more specifics to facility operations):

- Flying debris
- Chemical splash
- Welding sparks
- High heat
- Sharp objects (knives, box cutters, wire)
- Potential Bloodborne Pathogen Exposure
- Dust
- Chemical fumes/vapors exceeding OSHA PELs
- Falling debris from overhead

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**❖ Information for Filtering Facepiece (Dust Mask) Use ❖**  
***When Respirators Not Required Under 29 CFR 1910.134 - Appendix D***

**To the employer:** The statement below must be read by all employees (or read to them in an understandable fashion) who are using filtering facepiece (dust mask type). A copy of this document must be given to the employee.

**To the employee:** Ensure you keep a copy of this form for your personal records.

**EMPLOYEE INFORMATION**

Employee Name:	ID Number:
Facility:	Work Location:
Job Title:	Dept./Phone:

**VERIFICATION:** I acknowledge that I have read and/or understand the information below (OSHA Respiratory Protection Statement) as is required by the Occupational Safety and Health Administration (OSHA).

<b>EMPLOYEE SIGNATURE:</b>		<b>DATE:</b>	
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**OSHA RESPIRATORY PROTECTION STATEMENT**

**To The User:**

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard.

**You Should Do The Following:**

- Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations.
- Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you.
- Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke.
- Keep track of your respirator so that you do not mistakenly use someone else's respirator.

**FORM RETENTION INFORMATION**

Retention File:	Location:
Date Filed:	Filed By:

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## PROGRAM OVERVIEW

# PORTABLE LADDER SAFETY PROGRAM

**REGULATORY STANDARD:** OSHA - 29 CFR 1910.25 Portable Wood Ladders  
- 29 CFR 1910.26 Portable Metal Ladders  
- 29 CFR 1926.1050-1060

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**INTRODUCTION:** Details minimum requirements for the construction, care, and use of the common types of portable ladders ensuring safe use under normal conditions. The program has provisions for step, extension, and rung ladders.

### **TRAINING:**

Employers must train all employees to recognize hazards of ladder use, the inspection of ladders and in the limitations of ladders to minimize the risk exposure.

### **ACTIVITIES:**

- Ensure the appropriate type of ladder is selected based on the nature of the project
- Ensure employees are trained to inspect ladders for defects and in the safe use of ladders
- Ensure ladder inspections are performed
- Ensure ladders are properly repaired and maintained in accordance with regulatory standards or are properly disposed of when they are found to be defective (and or are removed from service)
- Ladders will be selected based on the type of work anticipated to be performed, and in accordance with applicable OSHA regulatory standards

### **FORMS:**

- Ladder Safety Checklist
- Training attendance roster

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- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

## Portable Ladder Safety Program

**1. Purpose.** Effective implementation for the safe use of ladders. This safety program is designed to establish safe use and handling requirements and will be communicated to all required personnel.

1.1 When changes occur to the governing regulatory standards

1.2 When facility operational changes occur that require a revision of this document

**2. Scope.** This program applies to the total workplace, regardless of the number of workers, work shifts or numbers and types of ladders used.

### **3. Responsibilities.**

3.1 Management and Supervisors:

3.1.1 Procure the appropriate type of portable ladders

3.1.2 Ensure employees are trained (as needed or required) in the inspection techniques used to inspect ladders and in the safe use of ladders (proper pitch, angle and hazard awareness)

3.1.3 Ensure ladder inspections are performed (pre-use and periodic inspection)

3.1.4 Ensure ladders are properly repaired in accordance with regulatory standards or properly disposed of when they are found to be defective or are removed from service

3.2 Employees:

3.2.1 Inspect ladders daily or before each use if ladders are not used daily

3.2.2 Do not use ladders that have not passed inspection

3.2.3 Notify management or supervisors if ladders are found to be defective and promptly tag them with a do not use sign and remove them from service

3.3 Competent Person:

3.3.1 Train employees in ladder inspection techniques

3.3.2 Provide recommendations for procurement, repair and disposal of ladders.

### **4. Procedure.**

4.1 General Requirements.

- 4.1.1 A stairway or ladder must be provided at all personnel points of access where there is a break in elevation of 19 inches (48 cm) or more, and no ramp, runway, sloped embankment, or personnel hoist is provided.
  - 4.1.2 A uniform step spacing must be employed which must be not more than 12 inches. Steps must be parallel and level when the ladder is in position for use.
  - 4.1.3 Rungs and steps shall be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize the possibility of slipping.
  - 4.1.4 Rungs should be kept free of grease and oil.
  - 4.1.5 Ladders will be maintained in good condition at all times, the joint between the steps and side rails will be tight, all hardware and fittings securely attached, and the movable parts will operate freely without binding or undue play.
  - 4.1.6 Ladders will not be placed in front of doors opening toward the ladder unless the door is blocked, locked, or guarded.
  - 4.1.7 Ladders will not be placed on boxes, barrels, or other unstable bases to obtain additional height.
  - 4.1.8 Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment will not be used, ladders having any of these conditions present will be destroyed and disposed of. Improvised repairs will not be made.
  - 4.1.9 Short ladders will not be spliced together to provide long sections.
  - 4.1.10 Ladders made by fastening cleats across a single rail will not be used.
  - 4.1.11 Ladders will not be used as guys, braces, or skids, or for other than their intended purposes.
- 4.2 Step Ladders.
- 4.2.1 Tops of ordinary stepladders will not be used as steps.
  - 4.2.2 The bracing on the back legs of step ladders is designed solely for increasing stability and not for climbing.
  - 4.2.3 The metal spreader or locking device of sufficient size and strength to securely hold the front and back sections in open positions must be properly maintained for each stepladder. The spreader must have all sharp points covered or removed to protect the user.
  - 4.2.4 Stepladders longer than 20 feet will not be used.
  - 4.2.5 Stepladders of one of the following types specified will be used:



- Type I--Industrial stepladder, 3 to 20 feet for heavy duty, such as utilities, contractors, and industrial use.
  - Type II--Commercial stepladder, 3 to 12 feet for medium duty, such as painters, offices, and light industrial use.
- 4.2.6 The minimum width between side rails at the top, inside to inside, must be not less than 11 1/2 inches. From top to bottom, the side rails must spread at least 1 inch for each foot of length of stepladder.
- 4.2.7 Painter's stepladders longer than 12 feet will not be used.
- 4.3 Extension/Rung Ladders.
- 4.3.1 Metal bearings of locks, wheels, pulleys, etc., will be frequently lubricated.
- 4.3.2 Frayed or badly worn rope will be replaced.
- 4.3.3 Safety feet and other auxiliary equipment will be kept in good condition to ensure proper performance.
- 4.3.4 Equipped with non-slip bases when there is a hazard of slipping. Non-slip bases are not intended as a substitute for care in safely placing, lashing, or holding a ladder that is being used upon oily, metal, concrete, or slippery surfaces.
- 4.3.5 The length of single ladders or individual sections of ladders must not exceed 30 feet.
- 4.3.6 Two-section ladders shall not exceed 48 feet in length and over two-section ladders must not exceed 60 feet in length.
- 4.3.7 Trestle ladders, or extension sections or base sections of extension trestle ladders longer than 20 feet will not be used.
- 4.3.8 Ladders will be so placed that the side rails have a secure footing, unless equipped with a single support attachment. The top rest for portable rung and cleat ladders will be reasonably rigid and will have ample strength to support the applied load.
- 4.3.9 No ladder should be used to gain access to a roof or elevated work area unless the top of the ladder is extended at least 3 feet above the point of support.
- 4.3.10 Rung and cleat ladders will, where possible, be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the top support). The ladder will be so placed as to prevent slipping, or it will be lashed, or held in position. Ladders will not be used in a horizontal position as platforms, runways, or scaffolds.

- 4.3.11 On two-section extension ladders the minimum overlap for the two sections in use will be as follows:

Size of Ladder (in Feet)	Overlap (in Feet)
Up to and including 36	3
Over 36 up to and including 48	4
Over 48 up to and including 60	5

- 4.3.12 Ladders with reinforced rails will only be used with the metal reinforcement on the underside.
- 4.3.13 Mason's ladder. A mason's ladder is defined as a special type of single ladder intended for use in heavy construction work. Mason's ladders longer than 40 feet will not be used.

## 5. Safety Information.

- 5.1 Ladders will be inspected frequently and those which have developed defects will be taken out of service until repaired by either maintenance department or the manufacturer.
- 5.2 If a ladder is involved in any of the following, immediate inspection is necessary:
- 5.2.1 If ladders tip over, inspect ladder for side rails dents or bends, or excessively dented rungs; check all rung-to-side-rail connections; check hardware connections; check rivets for shear.
  - 5.2.2 If ladders are exposed to oil and grease, equipment should be cleaned of oil, grease, or slippery materials.
- 5.3 Portable ladders are designed as a one-man working ladder based on a 200-pound load.
- 5.4 When ascending or descending, the climber must face the ladder.
- 5.5 Ladders should not be used as a brace, skid, guy or gin pole, gangway, or for other uses than that for which they were intended, unless specifically recommended for use by the manufacturer.
- 5.6 Metal ladders will not be used when work is performed on or near electric circuits.
- 5.7 Procurement and Disposal of Ladders. All procurement and disposal of ladders will be performed through or with the knowledge of the competent person or other designated person. Ladders will be destroyed beyond use prior to disposal to prevent further use by anyone. Procurement of ladders will be accomplished based on the type of work anticipated to be performed and in accordance with this safety program and applicable OSHA regulatory standards.

## 6. Training and Information.

- 6.1 Employees will be trained, as needed or required, in the inspection techniques related to daily or pre-use ladder inspections.
- 6.2 Employees will be trained in the safe use requirements of ladders (pitch, angle, etc.) and in their limitations of use (not near electrical current, not placed on top of other materials to increase height, etc.).

## 7. Definitions.

- Ø *Competent Person* - is knowledgeable of applicable standards, is capable of identifying workplace hazards relating to the specific operation, and has the authority to correct them.

# Ladder Safety Checklist

Date of Inspection:	Name of Inspector:	Ladder Number:
Type of Ladder:           ( ) Extension ( ) Step		
Construction of Ladder:   ( ) Wood ( ) Metal ( ) Fiberglass		
General	Compliant?	Needs Repair
All labels/markings/weight limits on the ladder are in place and legible.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
There are no lose or missing steps or rungs (loose if can be moved by hand).	<input type="checkbox"/> YES <input type="checkbox"/> NO	
There are no loose nails, screws, bolts, or other fasteners.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The ladder is not cracked, splintered, split, or broken uprights, braces, steps, or rungs.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The ladder is free from grease, oil, or slippery materials.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The joints between rungs and side rails are tight (loose if can be moved by hand).	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The ladder rungs/steps are tight and corrugated or knurled on metal ladders.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
All movable parts operate freely.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The non-slip bases are not damaged or worn.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Rails are free from cracks/splitting	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Hinge spreaders are not loose or bent allowing ladder to wobble.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
The hinge spreaders are not broken and do not have sharp or loose edges.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
There are no loose, broken, or missing extension locks.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
There are no defective locks that do not seat properly when ladder is extended.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Ladder ropes are not frayed, worn or missing.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Single section ladders do not exceed 30 feet in length	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Two-section extension ladders do not exceed 48 feet in length for metal ladders and 60 feet in length for wood ladders.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Ladders with more than two sections do not exceed 60 feet in length.	<input type="checkbox"/> YES <input type="checkbox"/> NO	
Comments		

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# TRAINING ATTENDANCE ROSTER

## PORTABLE AND FIXED LADDERS AND MOBILE STAIRS

**Portable Ladders and Mobile Stairs Training Includes:**

- *General Ladder Safety Requirements*
- *Inspection of Equipment*
- *Portable Step Ladder Use*
- *Portable Rung Ladder Use*
- *Fixed Ladder Use*
- *Mobile Stairs Use*

<u><b>INSTRUCTOR:</b></u>	<u><b>DATE:</b></u>	<u><b>LOCATION:</b></u>
NAME (Please Print) FIRST - MI - LAST	SIGNATURE	
By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed		

Name of Interpreter, if utilized: \_\_\_\_\_

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**Safe Driving and  
Vehicle/Fleet**



## PROGRAM OVERVIEW

# SAFE DRIVING AND VEHICLE/FLEET SAFETY PROGRAM

REGULATORY STANDARD: OSHA General Duty Clause

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**INTRODUCTION:** Company owned or leased vehicles must be maintained in proper condition, and drivers appropriately licensed to operate the type of vehicle. This program outlines the basic inspection techniques for using a company owned or leased vehicle. This program also outlines the basic safety requirements for operating both company owned and leased vehicles and for personal vehicles used for company business purposes.

### **TRAINING:**

- Appropriate driver's licenses for the type of vehicle are required.
- Basic driver safety is recommended for employees who use vehicles for company business.

### **ACTIVITIES:**

- Inspect vehicles prior to operation

### **FORMS:**

- Motor Vehicle Report (MVR) Policy
- Distracted Driving Policy
- Safe Driving Vehicle Inspection
- Training Attendance Roster

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

## Safe Driving and Fleet and Vehicle Management Safety Program

1. **Purpose.** This program outlines the recommendations for managing and inspecting automobiles and trucks used by company employees for business reasons.

2. **Scope.** This program applies to vehicles owned or leased by the company and to employee owned vehicles used for company business.

### 3. Responsibilities.

#### 3.1 Management:

3.1.1 Ensure drivers are licensed and certified for the type of vehicle driven, without restrictions on their licenses.

3.1.1.1 Where MVR reports are required annually or for pre-employment, ensure an adequate process to obtain and confidentially maintain this information is in place. Inform employees of company's motor vehicle report policy.

3.1.2 Ensure any vehicles are properly inspected, registered and maintained.

3.1.3 Ensure seat belts, safety chains for snow and other equipment is available and functional, as needed or required.

3.1.4 Ensure vehicle insurance is in place for any owned or leased vehicles.

3.1.5 Revoke the driving privileges for employees driving company owned or leased vehicles where the driving record or ability of the employee may be in question.

#### 3.2 Employees or Drivers:

3.2.1 Ensure your driver's license is current

3.2.2 Ensure your driver's license is the appropriate type for the vehicle being used.

3.2.3 Inspect vehicles before driving.

3.2.4 Ensure you are capable of driving safely (physical, emotional and mental health)

#### 3.3 Safety Officer:

3.3.1 Assist in the development and implementation of the written program, as needed.

### 4. Procedure.

#### 4.1 General Requirements:

- 4.1.1 Only authorized personnel may drive company vehicles.
  - 4.1.2 Driving while under the influence of alcohol, inhalants or illegal drugs, or after taking any medications that may impair your driving ability is prohibited.
  - 4.1.3 Drivers must obey all traffic signals and devices, and obey traffic laws at all times.
  - 4.1.4 Seatbelts must be worn at all times while the vehicle is in motion.
  - 4.1.5 Only company authorized persons may ride as a passenger in a company owned or leased vehicle, based on company policy.
  - 4.1.6 Drivers may only use “hands-free” style phone systems when the vehicle is in motion, based on state requirements and company’s distracted driving policy.
- 4.2 Break Downs Involving Company Vehicles:
- 4.2.1 Drivers must notify the company as soon as possible after any accident or incident with a company vehicle, regardless of how minor the incident may have been.
  - 4.2.2 Contact your supervisor or manager immediately for assistance obtaining towing or repair.
  - 4.2.3 If the company subscribes to a vehicle service agency (like AAA or other road-service provider), follow the established procedure for contacting that agency.
- 4.3 Vehicular Accidents. In the event of an accident, remain calm. Our first priority is the health and safety of our employees. Employees involved in a work-related vehicular accident must:
- 4.3.1.1 Contact the appropriate local law enforcement agency. Even if the incident is minor, a police report is required for all vehicular accidents involving a company owned vehicle or for those occurring while the employee is performing company business.
  - 4.3.1.2 Notify company management or Supervisors as soon as possible.
  - 4.3.1.3 If possible, leave vehicles in their positions until the police arrive.
  - 4.3.1.4 Do not discuss the accident with others involved. Share your observations only with the police.
  - 4.3.1.5 Exchange, if possible, the following information with all other drivers involved:

- 4.3.1.5.1 The driver's name
- 4.3.1.5.2 The names of all other passengers (per involved vehicle)
- 4.3.1.5.3 The driver's/auto insurance information
- 4.3.1.5.4 The other vehicle information: make, model, year, color, and license plate number
- 4.3.1.5.5 The name of the driver's employer if the driver was traveling for business
- 4.3.1.6 If property damage occurred to a vehicle of an unknown owner (e.g. a parked car) or other property (e.g. a fence), do NOT leave the scene until a full police report is completed.

## **5. Safety Information.**

- 5.1 Notification of Driver Suspension, Accidents or similar issues
  - 5.1.1 Employees must notify their supervisor or manager within 24 hours of any citation of traffic or driving violation, if the violation occurred while using a company vehicle.
  - 5.1.2 Employees who may be expected to drive for company business must notify their supervisor or manager if their license is suspended, revoked or restricted for any reason.
- 5.2 Companies will maintain owned or leased vehicles in a safe manner.
  - 5.2.1 Employees who find defects or repair needs with any company vehicle must notify their supervisor or manager immediately.
  - 5.2.2 Employees may not drive company vehicles that are in an unsafe condition.
- 5.3 Pre-Driving Inspection:
  - 5.3.1 Tire condition and, if necessary, pressure
  - 5.3.2 Spare tire available
  - 5.3.3 Lights and turn signals operational
  - 5.3.4 Windshield wipers functional
  - 5.3.5 Windshield intact (no cracks or breaks)

- 5.3.6 Defroster operational
- 5.3.7 Oil and fluids (windshield cleaner, transmission, brake fluid) present at required levels.
- 5.3.8 Brakes functional
- 5.3.9 Mirrors are present, properly adjusted and clean.
- 5.3.10 Vehicle loads are secure
- 5.3.11 Emergency materials and equipment (fire extinguishers, accident reporting kit, vehicle registration, etc.) are present, as needed.
- 5.3.12 General vehicle condition is appropriate. Scrapes, scratches, dents or other damage should be reported before taking the vehicle on the road.

## **6. Training and Information.**

- 6.1 It is recommended that employees undergo defensive driving or general safe driving training when they are required to operate company owned or leased vehicles.

## **7. Definitions.**

- *Driving Responsibilities* – An employee who drives a vehicle (company owned or leased, or a personal vehicle) for company business purposes.
- *Vehicle* – a company owned or leased automobile, truck or motorcycle which requires a valid driver's license to operate on public roadways.

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## Motor Vehicle Report (MVR) Policy

In order to increase employee safety and eliminate unnecessary risks behind the wheel, the company \_\_\_\_\_ has enacted a Motor Vehicle Report (MVR) Policy, effective \_\_\_\_\_.

MVRs will be checked \_\_\_\_\_ for all employees who may be required to drive for company purposes. The MVR will be reviewed to ascertain whether the employee holds a valid license and whether his or her driving record is within the parameters set by the company.

Drivers will be disqualified from driving vehicles for company purposes for any of the following reasons:

1. A violation for driving under the influence of alcohol or a controlled substance will result in a suspension of driving privileges for the company.
2. Any criminal conviction that involves a motor vehicle (e.g., a felony, hit and run, negligent homicide) in the previous five years
3. Any of the following violations incurred in the previous three years:
  - a. Any combination of more than three moving violations (any violation resulting in an at-fault auto accident automatically counts as two violations)
  - b. Any violation less than three years old for an alcohol or controlled substance-related driving offense
  - c. Refusing to take a breathalyzer test
  - d. Careless or reckless driving that results in injury to persons or property
  - e. Passing a stopped school bus
  - f. Leaving the scene of an accident without stopping to file a report
  - g. Racing
4. Any combination of more than two moving violations and/or at-fault accidents in the past 12 months

**I have read, understand and agree to the terms set forth in this Driving and Traffic Violation Policy.**

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (printed)

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# Distracted Driving Policy

**Please read the Distracted Driving Policy, sign and return to your supervisor.**

In order to increase employee safety and eliminate unnecessary risks behind the wheel, the company \_\_\_\_\_ has enacted a Distracted Driving Policy, effective \_\_\_\_\_.

We are committed to ending the epidemic of distracted driving, and have created the following rules, which apply to any employee operating a company vehicle or using cell phone while operating a personal vehicle:

- Company employees may not use a hand-held cell phone while operating a vehicle, when the vehicle is in motion or stopped at a traffic light. This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.
- If company employees need to use their phones, they must pull over safely to the side of the road or another safe location.
- Additionally, company employees are required to:
  - Turn cell phones off or put them on silent or vibrate before starting the car.
  - Consider modifying voice mail greetings to indicate that you are unavailable to answer calls or return messages while driving.
  - Inform clients, associates and business partners of this policy as an explanation of why calls may not be returned immediately.
- Employees will be subject to disciplinary action up to and including termination for violating any of the above rules.

I acknowledge that I have received a written copy of the Distracted Driving Policy, that I fully understand the terms of this policy, that I agree to abide by these terms, and that I am willing to accept the consequences of failing to follow the policy.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Name (printed)

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## SAFE DRIVING VEHICLE INSPECTION CHECKLIST

ITEM	YES	NO
Tires are in good condition (tread, pressure)		
Spare tire is accessible		
Head-lights operational (regular and high beams)		
Turn signals operational		
Windshield wipers operational		
Washer fluid available		
Windshield intact (no cracks or breaks)		
Defroster operational, as needed		
Oil and fluid levels (brake, transmission, oil) present at required levels		
Brake lights function		
Mirrors (side and rearview) present and in good condition		
Mirrors adjusted for driver		
Vehicle loads and any storage of materials are secure		
Fire extinguishers are present, as needed		
Vehicle registration is available		
Accident reporting information is available		
Vehicle is in generally good condition.		
Note any dents, scratches or other damage issues present:		
Checklist completed by:		
Date:	Time of Day:	

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# TRAINING ATTENDANCE ROSTER

## SAFE DRIVING - BASIC AWARENESS

**Safe Driving Training Includes:**

- *The 3 Factors of Safe Driving*
- *The 6 Conditions of Driving*
- *The 5 Steps to Decision Driving*
- *Passing and Collision Prevention*
- *Right of Way*
- *Stopping Distance and Types of Stopping*
- *Tailgating*
- *Driving Attitude*

<u><b>INSTRUCTOR:</b></u>	<u><b>DATE:</b></u>	<u><b>LOCATION:</b></u>
---------------------------	---------------------	-------------------------

NAME (Please Print) FIRST - MI - LAST	<b>SIGNATURE</b>
--	------------------

By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed


Name of Interpreter, if utilized: \_\_\_\_\_

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## COMPANY SPECIFIC CORRECTIVE ACTIONS

**DATE:**

**ASSESSOR:**

**DEPT OR AREA:**

**SUBMITTED TO:**

<u>CONDITION</u>	<u>COMPLIANT</u>	<u>CORRECTED BY</u>	<u>COMPLETION DATE</u>	<u>COMMENTS AND CORRECTIVE ACTION</u>
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			
	<input type="checkbox"/> Yes <input type="checkbox"/> No			





# RESTAURANT SAFETY CHECKLIST

**Completed by:**

**Date:**

ITEM	COMPLIANT?
<b>General Conditions</b>	
Are walking surfaces clean, clear of debris, and dry?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are warning signs placed in wet floor areas?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are stairs, steps, handrails, and landings in good condition?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is area lighting adequate?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is general housekeeping acceptable and storage neat and orderly?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are first aid kits available and well stocked?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Non-slip mats are in good condition and maintained on a regular basis?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Dish rags, aprons and other cloth are kept away from hot surfaces?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Range hoods and stoves are cleaned on schedule according to manufacturer's directions?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Drain lids fit securely and all drains and other floor openings are adequately covered?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Emergency Evacuation</b>	
Does the facility have a written emergency action plan?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are employees trained on emergency evacuation procedures?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are exit paths clear and unlocked from the inside out?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are exits properly identified and lighted?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are doors that could be mistaken for an exit appropriately marked NOT AN EXIT, BASEMENT, STORAGE ROOM, etc.?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are exit doors operable?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is emergency lighting operable?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Does the fire alarm work?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Has the fire alarm been tested?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Back Safety</b>	
Employees are utilizing the correct lifting technique?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Equipment, carts, and/or tables are of proper height provided to assist with the prevention of back injuries?	<input type="checkbox"/> YES <input type="checkbox"/> NO

ITEM	COMPLIANT?
Is a buddy system in place to ensure "help" when performing heavy lifting?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Burn Prevention</b>	
Potholders are within reach of hot dishes and containers?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Employees are using tongs and wear oven mitts, aprons or other personal protective equipment when handling pots and other hot materials?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Pot handles and utensils are kept away from burners?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Pots and pans are not overfilled with liquids?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Range has adequate room for the safe handling of pots to minimize steam and scalding burns?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Chemicals</b>	
Chemicals are stored according to their chemical properties?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is there a list of all chemicals used available?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are Safety Data Sheets (SDS) available for every chemical?	<input type="checkbox"/> YES <input type="checkbox"/> NO
All containers of chemicals are clearly labeled with the name of the chemical, appropriate hazard warning, and name of manufacturer?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Employees are washing their hands thoroughly after handling chemicals?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are employees who use chemicals trained on the Hazard Communication standard?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is a Written Hazard Communication Program completed?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Cut Prevention</b>	
Employees cut away from their body and keep their thumbs and fingers out of the way of the cutting path?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Electric slicer and other machinery have all guarding in place and in good working condition?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Brooms and dust pans are used to pick up broken glass?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Knives are stored with all the blades facing in one direction?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Knives are sharp and kept in good condition?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Electrical Safety - General</b>	
All electrical outlets, junction boxes, and other electrical components properly covered?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are panel box doors closed, free from obstruction, all circuits labelled, and all circuit spaces covered?	<input type="checkbox"/> YES <input type="checkbox"/> NO
GFCI (Ground Fault Circuit Interrupters) placed on electrical outlets near water sources?	<input type="checkbox"/> YES <input type="checkbox"/> NO

ITEM	COMPLIANT?
Are extension cords used only for temporary means and not used as permanent wiring?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are multiple plug outlets and use of extension cords kept to a minimum?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are portable heating devices UL-listed?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Fire Extinguishers Safety</b>	
Are fire extinguishers provided for the types of materials in areas where they are to be used?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are appropriate fire extinguishers mounted?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are extinguishers free from obstructions or blockage?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are all extinguishers serviced, maintained and tagged at intervals not to exceed one year?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are all extinguishers fully charged and in their designated places?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Outside Grounds</b>	
Is the parking area well maintained?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are exterior walkways in good physical condition?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is exterior illumination adequate?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are all lights functional?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are walkways, roads, and parking lots kept clear of ice and snow?	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>Personal Protective Equipment</b>	
Cut resistant gloves such as steel mesh are worn to prevent knife injuries, as appropriate?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are protective gloves provided and required where employees could be exposed to chemicals?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is all protective equipment maintained in a sanitary condition and ready for use?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Are employees trained on how to use PPE?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Is the Certification of Hazard Assessment form completed?	<input type="checkbox"/> YES <input type="checkbox"/> NO

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## PROGRAM OVERVIEW

# **SAFETY MEETINGS AND COMMITTEE CHARTER SAFETY PROGRAM**

REGULATORY STANDARD: OSHA General Duty Clause

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## **INTRODUCTION**

Safety meetings provide the opportunity for employees and supervisors to engage in discussions on a variety of safety topics. Effective meetings promote cooperation and reinforce important safety and health operating philosophies and practices at the company and foster commitment and participation by both employees and management in the company's safety management program.

## **TRAINING**

- Training is recommended for all safety committee members.

## **ACTIVITIES**

- If required, establish a safety committee
- Meet on a regular basis (at least quarterly) to discuss safety issues or concerns appropriate to the workplace
- Ensure notes are taken at committee meetings and actions and activities are documented. Where corrective actions are required, ensure follow up is completed

## **FORMS**

- Safety Committee Task Sheet
- Training Attendance Roster

## **Table of Contents**

- 1. Purpose**
- 2. Scope**
- 3. Responsibilities**
- 4. Procedure**
- 5. Safety Information**
- 6. Training and Information**
- 7. Definitions**

# SAFETY MEETINGS AND COMMITTEE CHARTER SAFETY PROGRAM

1. **Purpose.** This program is designed to outline the format and process to enable supervisors, management, or a company safety committee to hold effective safety discussions that provide safety related information, and to hold committee or group meetings centered on safety topics.
2. **Scope.** Applies to safety related meetings or safety committee meetings held at the company.

## 3. Responsibilities

### 3.1 Management/Supervisors

- 3.1.1 Support the safety suggestions of the employees, as feasible.
- 3.1.2 Support the creation of a safety committee.
- 3.1.3 Communicate with the safety committee chairperson or with supervisors and other management on safety issues and concerns.
- 3.1.4 Assist in the development and implementation of solutions to safety issues.
- 3.1.5 Review this program and the status of safety actions taken at least annually.
- 3.1.6 Hold regularly scheduled discussions with employees on safety topics. Safety discussions should be held with employees:
  - 3.1.6.1 Upon initial job assignment or reassignment. A well-planned and well-executed safety orientation forms the foundation for each individual's future safety and health performance. Each supervisor should ensure that new employees receive a copy of specific safe work practices and procedures, as appropriate to the job or position.
  - 3.1.6.2 When workplace changes occur that require updated information. Process changes, new materials or changes to existing procedures or equipment may prompt a safety discussion on how to safely use or handle the material or equipment.
  - 3.1.6.3 When new jobs or tasks are planned. Discussion involving work being planned should include listing potential hazards, developing suggested "engineering" approaches to reduce risk, identifying safety equipment to be used, and developing basic safe operating procedures.



- 3.1.6.4 When a workplace injury or incident occurs. Discussion should focus on the facts surrounding the incident, the injury, and the various causes that allowed the incident to occur, rather than on the injury or illness itself. Medical privacy concerns may need to be considered during discussions.
- 3.1.6.5 When employee behaviors are noted that require a safety discussion. Discussion of a failure to adhere to a safety procedure should cover why such a behavior is wrong, the potential hazards, and constructive discussion on how to correctly follow procedures.
- 3.1.6.6 When defective tools or equipment are identified (by employees or the manufacturer).
- 3.1.6.7 When regulatory changes require updated information.

## 3.2 Employees

- 3.2.1 Follow established safety procedures.
- 3.2.2 Report safety issues, concerns or violations to your supervisor.
- 3.2.3 Participate, as needed or required, in safety meetings.
- 3.2.4 Participate, if appropriate, on the safety committee.

## 3.3 Safety Committee (as needed or required)

- 3.3.1 Meet at least quarterly to discuss safety issues and needs at the company. Monthly meetings are recommended.
- 3.3.2 Keep discussions pertinent and productive.
- 3.3.3 Complete any action items assigned.
- 3.3.4 Perform incident reviews, inspections or audits, if appropriate.

## 3.4 Safety Committee Chairperson (as needed or required)

- 3.4.1 Maintain a current listing of safety committee membership.
- 3.4.2 Schedule meetings with committee membership at least quarterly. Monthly meetings are recommended.
- 3.4.3 Set the discussion topics or agenda for the meeting.
- 3.4.4 Facilitate the meeting, keeping the discussion pertinent and productive.
- 3.4.5 Take meeting notes, or designate another member as note-taker.

- 3.4.6 Distribute meeting notes to committee members and, as appropriate, to management.
- 3.4.7 Assure action items assigned at the meetings are tracked and completed.
- 3.4.8 Enlist management assistance, as needed or required.

#### **4. Procedure**

##### 4.1 Supervisory and Employee Discussions

- 4.1.1 Supervisors, in conjunction with management and/or the company's Safety Officer or Safety Committee will conduct regular meetings with employees on various safety topics.
- 4.1.2 The level of detail required to ensure that the information is relevant to the employees is determined by the supervisor.
- 4.1.3 Safety briefings will be provided at least quarterly. Discussions may be more frequently conducted (i.e. monthly or weekly), based on the type of business and workplace hazards.
- 4.1.4 Safety discussions may be held as a part of routine group meetings, or as part of routine job inspections, procedure reviews or within job hazard analysis review. In this situation, 10-15 minutes should provide sufficient time for a review of a specific topic or procedure.
- 4.1.5 Formal meetings devoted solely to safety topics may include:
  - 4.1.5.1 An explanation of the objectives of the meeting or training.
  - 4.1.5.2 A breakdown of the points or part of the procedure, identifying each key step, and the safety measure for each step.
  - 4.1.5.3 Using a demonstration of proper methods rather than a verbal explanation.

##### 4.2 Principal Activities of the Safety Committee

- 4.2.1 Assemble at least quarterly (monthly is recommended) to conduct safety meetings.
- 4.2.2 Discuss and report on unfinished business or action items from previous meetings.
- 4.2.3 Discuss new business, issues or concerns.
- 4.2.4 Maintain records of meetings (notes or meeting minutes are recommended).

- 4.2.5 If appropriate to the business of the company, or at management direction, the following additional duties may be performed by the committee:
  - 4.2.5.1 Direct and monitor group or departmental safety meetings.
  - 4.2.5.2 Direct and monitor employee safety training needs and requirements.
  - 4.2.5.3 Perform or oversee departmental safety inspections.
  - 4.2.5.4 Review accident/injury information and discuss corrective actions.

## 5. Safety Information

### 5.1 Safety Committee Charter

- 5.1.1 The safety committee will encourage safety awareness among all employees. It will be established to monitor safety performance, safety inspections, and aid the Safety Officer and management in administering the safety program. The committee is charged to:
  - 5.1.1.1 Discuss strategies to reduce incidents.
  - 5.1.1.2 Assist in implementing corrective or preventive actions to increase safety and reduce hazards.
  - 5.1.1.3 Be aware of conditions in all work areas that can produce injuries.
  - 5.1.1.4 Aid the company in complying with all applicable laws and regulations pertaining to safety.
  - 5.1.1.5 Assist in assuring that no employee is required to work at a job that is not safe or healthful. The safety and health of each employee is of primary importance to the company.
  - 5.1.1.6 Assist management in making recommendations for tools, equipment, and controls for safety and health in keeping with the highest standards.
  - 5.1.1.7 Assist in maintaining a safety and health program conforming to the best management practices of our industry or market segment.
  - 5.1.1.8 Assist in establishing a safety management program that instills the proper attitudes toward injury and illness prevention not only on the part of employees, but also between each employee and his or her co-workers.

## 5.2 Safety Committee Composition

- 5.2.1 The safety committee is, primarily, a voluntary group. There are occasions when management may appoint members.
  - 5.2.1.1 It is recommended that committee membership be rotated among different employees. Recommended term of service is one year.
- 5.2.2 The safety committee should consist of at least three members from the employee base, and one member of supervision or management. Greater membership may be based on the size of the company, or the types of hazards encountered in the workplace.
- 5.2.3 Each department or work area should be represented on the committee.
- 5.2.4 A member to take notes or meeting minutes should be designated or elected.
- 5.2.5 A committee chairperson should be elected by the committee. The supervisory/management member should not be the committee chairperson. The Safety Officer may be present to offer advice or to act as committee chairperson or note-taker if these designated people are absent.

## 5.3 Safety Committee Meeting Rules

- 5.3.1 Safety committee meetings will be conducted in such a manner as to foster a productive work environment. The principal goal being to determine solutions to safety issues affecting our employees. The following ground rules apply.
  - 5.3.1.1 Notes or meeting minutes will be taken at each meeting. Meeting minutes should be distributed to each member of the committee and to members of management, as appropriate.
  - 5.3.1.2 Time limits may be set for each issue or topic, in order to establish and maintain a productive course of action. Discussion time limits on each safety topic will be typically kept to a 20 minute time limit.
  - 5.3.1.3 Action items or subcommittees may be formed when an issue cannot be resolved in a reasonable amount of time. Investigation of an issue and/or development of recommendations may be required, and timeframes may be established for action item completion. Action items of this nature will be classified as “old business” and integrated into the next Safety Committee Meeting as appropriate. Where issues can not be reasonably resolved, company management will be consulted to assist in the issue resolution.

- 5.3.1.4 Safety issues may be classified and prioritized. All priority one issues will be immediately addressed by company management and supervisors. Corrective and preventive actions may be reviewed by the committee, but reporting of the issue will be immediate upon discovery.
  - 5.3.1.4.1 *Priority 1 Hazards* are the most serious type of unsafe condition or unsafe work practice that could cause loss of life, permanent disability, the loss of a body part (amputation or crippling injury), or extensive loss of structure, equipment, or material.
  - 5.3.1.4.2 *Priority 2 Hazards* are unsafe conditions or work practices that could cause serious injury, industrial illness, or disruptive property damage.
  - 5.3.1.4.3 *Priority 3 Hazards* are unsafe conditions or work practices that might cause a recordable injury or industrial illness or non-disruptive property damage.
  - 5.3.1.4.4 *Priority 4 Hazards* are minor conditions, a housekeeping item or unsafe work practice infraction with little likelihood of injury or illness other than perhaps a first-aid case.
- 5.3.1.5 Safety issue resolution will be determined based on the following decision tier: Engineering controls will be considered as a first priority (equipment, guards, or process design); Administrative controls will be considered as a second priority (written procedures, restriction of exposure time, substitution of a less-hazardous material); Personal Protective Equipment (PPE) will be considered as a third and last priority.

## 6. Training and Information

### 6.1 Safety Committee Members

- 6.1.1 Members of the committee may be required to attend additional safety-related training, as appropriate to the activities of the committee. Such training may include: accident investigation techniques, hazard recognition, and auditing/inspection methods.

### 6.2 Supervisors

- 6.2.1 Supervisors may be required to attend training, as appropriate to the hazards encountered by their employees in the work area. At a minimum, supervisors should have a basic understanding of accident investigation techniques, hazard recognition, and auditing/inspection methods.

## 7. Definitions

- *None at this time*

# SAFETY COMMITTEE TASK SHEET

SAFETY MEETING DATE:

SUBCOMMITTEE TASK TITLE:

## ASSIGNED SUBCOMMITTEE MEMBERS

MEMBER:

DEPARTMENT:

PHONE:

MEMBER:

DEPARTMENT:

PHONE:

MEMBER:

DEPARTMENT:

PHONE:

MEMBER:

DEPARTMENT:

PHONE:

Supervisor Notified:  
 Yes  No

Related Operating Procedures Reviewed:  
 Yes  No

All Affected Employees Notified:  
 Yes  No

Date:

Date:

Date

## COMMITTEE NARRATIVE OF TASKING

## COMMITTEE INITIAL FINDINGS AND RECOMMENDATIONS

DATE SUBMITTED TO SAFETY COMMITTEE:

SAFETY COMMITTEE POINT OF CONTACT:

# SAFETY COMMITTEE ACTIONS

## INITIAL ACTION(s)

NARRATIVE OF INITIAL ACTION(s) TAKEN

## FOLLOW-UP ACTION(s)

RESPONSIBLE PERSON:

PHONE:

DATE:

RECOMMENDATIONS:

## ESTIMATED COMPLETION DATE:

RESPONSIBLE PERSON:

PHONE:

DATE:

RECOMMENDATIONS:

## TASK COMPLETED

RESPONSIBLE PERSON:

PHONE:

DATE:

SUMMARY OF ACTIONS TAKEN:

## TASK CLOSURE

I acknowledge that I have investigated the subcommittee tasking detailed in this report and have taken the necessary steps to ensure correction of safety deficiencies noted.

\* Further detailed on attachment:  Yes  No

Name:

Signature:

Title:

Date:

Time:

### REPORT FORM RETENTION INFORMATION

### ATTACHMENTS

Permanent Retention File:

Location:

\*Yes       No

Date Filed:

Filed By:

\*See Following Pages



# TRAINING ATTENDANCE ROSTER SAFETY COMMITTEE

**Safety Committee Training Includes:**

- Purpose of a Committee
- Positions and Responsibilities
- Charter and Meeting Rules
- Accident Investigation and Inspection
- Reporting Hazards
- Leading and Participating in Meetings
- Job Hazard Analysis Methods

<u><b>INSTRUCTOR:</b></u>	<u><b>DATE:</b></u>	<u><b>LOCATION:</b></u>
NAME (Please Print) FIRST - MI - LAST	SIGNATURE	
By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed		

Name of Interpreter, if utilized: \_\_\_\_\_

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## PROGRAM OVERVIEW

# **WALKING AND WORKING SURFACES SAFETY PROGRAM**

REGULATORY STANDARD: OSHA - 29 CFR 1910.21 – 23

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## **INTRODUCTION**

General requirements for: aisles, passageways, housekeeping, storerooms, servicerooms, stairs and guard-rails. It also addresses floor-loading protection and protecting open sided floors and platforms. This program targets renovation and construction areas where walking and working surface hazards are more likely to be present.

## **TRAINING**

- Employees, supervisors and staff members should be informed of the proper materials handling and storage procedures to ensure that such materials do not cause hazardous situations to occur
- Employees providing construction, repair and renovation work should be trained in the proper use of coverings, guardrail system and other requirements to ensure the appropriate level of protection and safety

## **ACTIVITIES**

- Ensure aisles and passageways are of the proper width and appropriately maintained
- Provide personal fall systems, covers or guardrails for floor, wall openings
- Ensure hazardous areas (open pits, vats or trenches) have appropriate personal fall systems
- Provide personal fall systems for any open-sided platform, floor or runway
- Ensure floors are not overloaded, and that load limits are indicated
- Ensure stairways have appropriate railings
- Enforce housekeeping rules
- Ensure materials are properly stored and not obstructing aisles, passageways, stairways or other areas where they could cause a hazard
- Encourage employees to report unsafe conditions

## **FORMS**

- Slips, Trips, and Falls Training Attendance Roster
- Walking and Working Surfaces Training Attendance Roster

## Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training and Information
7. Definitions

## WALKING/WORKING SURFACE INDUSTRIAL SAFETY PROGRAM

**1. Purpose.** This safety program is designed to establish clear company goals and objectives with regard to walking and working surfaces and will be communicated to all required personnel. Walking and working surfaces include stairways, aisles, platforms, runways and areas where floor or wall openings could present a hazard to employees. The company will review and evaluate this safety program:

1.1 On an annual basis, or more frequently as needed.

1.2 When changes occur to 29 CFR 1910.21 - 23 that prompt revision of this document

1.3 When facility operational changes occur that require a revision of this document

**2. Scope.** This program encompasses the total workplace or job site regardless of the number of workers employed or the number of work shifts.

### **3. Responsibilities**

3.1 Management/Supervisors:

3.1.1 Ensure aisles and passageways are of the proper width and appropriately maintained.

3.1.2 Provide fall protection systems, covers or guardrails for floor, wall openings.

3.1.3 Ensure hazardous areas (open pits, vats or trenches) have appropriate fall protection systems.

3.1.4 Provide fall protection systems for any open-sided platform, floor or runway.

3.1.5 Ensure floors are not overloaded.

3.1.6 Ensure stairways have appropriate railings.

3.1.7 Enforce housekeeping rules.

3.1.8 Ensure materials are properly stored and not obstructing aisles, passageways, stairways or other areas where they could cause a hazard.

3.1.9 Encourage employees to report unsafe conditions.

3.2 Employees

3.2.1 Report unsafe conditions to your supervisor immediately.

3.2.2 Maintain safe storage requirements

3.2.3 Maintain housekeeping in work areas.

## 4. Procedure

### 4.1 Aisles and Passageways

4.1.1 Where mechanical handling equipment is used sufficient safe clearances will be maintained for aisles, at loading docks, through doorways, and wherever turns or passage must be made. Aisles and passageways must be kept clear and in good repair with no obstruction across or in aisles that could create a hazard.

4.1.2 Permanent aisles and passageways must be appropriately marked.

### 4.2 Fall Protection Systems, Covers or Guardrails

4.2.1 Fall Protection Systems, covers and/or guardrails must be provided to protect personnel from the hazards of open pits, tanks, vats, ditches, etc. Work areas will be properly guarded, covered, cordoned off, or marked to prevent injury, including:

4.2.1.1 Stairways unguarded/containing holes.

4.2.1.2 Ladder way floor openings unguarded.

4.2.1.3 Hatchway and chute floor opening unguarded.

4.2.1.4 Skylight floor openings unguarded.

4.2.1.5 Pit and trapdoor floor openings unguarded.

4.2.1.6 Manhole floor openings unguarded.

4.2.1.7 Temporary floor openings unguarded.

4.2.1.8 Floor holes/openings unguarded.

4.2.1.9 Chute wall openings unprotected.

4.2.1.10 Window wall openings unprotected.

4.2.1.11 Temporary wall openings unprotected.

4.2.1.12 Open-sided floor or platforms unguarded.

4.2.1.13 Runways unprotected.

4.2.1.14 Stairways unprotected.

### 4.3 Floor Loading Protection

- 4.3.1 Whenever loads or single items exceeding 350lbs are to be placed on floor areas or roofing structures, employees will determine the safe load capacity before taking this action.
- 4.3.2 Safe floor loading capacities will be marked on plates of approved design which must be supplied and securely affixed in a conspicuous place in each space to which they relate.
- 4.3.3 Such plates will not be removed or defaced. If lost, removed, or defaced, they will be reported to the Safety Officer and replaced immediately.
- 4.3.4 All employees must note that it is unlawful to place, or cause, or permit to be placed on any floor or roof of a building or other structure a load greater than that for which such floor or roof is approved by the building official.

### 4.4 Guarding Floor/Wall Openings and Holes

#### 4.4.1 Protection for floor openings

- 4.4.1.1 Stairway floor openings. Stairway floor openings must be guarded by a standard railing constructed in accordance with 29 CFR 1910.23, paragraph (e). The railing must be provided on all exposed sides (except at entrances to stairways). For infrequently used stairways where traffic across the opening prevents the use of a fixed standard railing (as when located in aisle spaces, etc.), the guard must consist of a hinged floor opening cover of standard strength and construction and removable standard railings on all exposed sides (except at entrance to stairway).
- 4.4.1.2 Ladder-way floor openings. Ladder-way floor openings or platforms must be guarded by a standard railing with standard toe-board on all exposed sides (except at entrance to opening) with the passage through the railing either provided with a swinging gate or so offset that a person cannot walk directly into the opening.
- 4.4.1.3 Hatchway and chute floor openings. Hatchway and chute floor opening must be guarded by one of the following:
  - Hinged floor opening cover of standard strength and construction equipped with standard railings or permanently attached thereto so as to leave only one exposed side. When the opening is not in use the cover must be closed or the exposed side must be guarded at both top and intermediate positions by removable standard railings.

- A removable railing with toe-board on not more than two sides of the opening and fixed standard railings with toe-boards on all other exposed sides. The removable railings must be kept in place when the opening is not in use. Where operating conditions necessitate the feeding of material into any hatchway or chute opening protection must be provided to prevent a person from falling through the opening.
- 4.4.1.4 Skylight floor openings. Skylight floor openings and holes must be guarded by a standard skylight screen or a fixed standard railing on all exposed sides.
- Skylight screens must be of such construction and mounting that they are capable of withstanding a load of at least 200 pounds applied perpendicularly at any one area on the screen. They must also be of such construction and mounting that under ordinary loads or impacts, they will not deflect downward sufficiently to break the glass below them. The construction must be of grillwork with openings not exceeding 4 inches long or of slat-work with openings not more than 2 inches wide with length unrestricted.
- 1.1.1.2 Pit and trapdoor floor openings. Pit and trapdoor floor openings, infrequently used, must be guarded by a floor opening cover of standard strength and construction. While the cover is not in place, the pit or trap opening must be constantly attended by someone or must be protected on all exposed sides by removable standard railings.
- 1.1.1.3 Manhole floor openings. Manhole floor openings must be guarded by a standard manhole cover which need not be hinged in place. While the cover is not in place, the manhole opening must be constantly attended by someone or must be protected by removable standard railings.
- 1.1.1.4 Temporary floor openings. Temporary floor openings must have standard railings, or must be constantly attended by someone.
- 1.1.1.5 Floor holes. Floor holes into which persons can accidentally walk must be guarded by either:
- A standard railing with standard toe-board on all exposed sides
  - A floor-hole cover of standard strength and construction. While the cover is not in place, the floor hole must be constantly attended by someone or must be protected by a removable standard railing



- Every floor hole into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) must be protected by a cover that leaves no openings more than 1 inch wide. The cover must be securely held in place to prevent tools or materials from falling through

1.1.1.2 Floor hole covers. Floor opening covers may be of any material that meets the following strength requirements:

- Trench or conduit covers and their supports, when located in roadways, must be designed to carry a truck rear-axle load of at least 20,000 pounds.
- Manhole covers and their supports, when located in roadways, must comply with local standard highway requirements, if any; otherwise they must be designed to carry a truck rear-axle load of at least 20,000 pounds.
- The construction of floor opening covers may be of any material that meets the strength requirements. Covers projecting not more than 1 inch above the floor level may be used providing all edges are chamfered to an angle with the horizontal of not over 30 degrees. All hinges, handles, bolts, or other parts must set flush with the floor or cover surface.

1.1.1.2 Stairway doors. Where doors or gates open directly on a stairway a platform must be provided and the swing of the door must not reduce the effective width to less than 20 inches.

1.1.2 Protection for wall openings and holes

4.4.2.1 Wall openings. Wall openings from which there is a drop of more than 4 feet must be guarded by one of the following:

- Rail, roller, picket fence, half door, or equivalent barriers. Where there is exposure below to falling materials, a removable toe board or the equivalent must also be provided. When the opening is not in use for handling materials, the guard must be kept in position regardless of a door on the opening. In addition, a grab handle must be provided on each side of the opening with its center approximately 4 feet above floor level and of standard strength and mounting.
- Extension platforms onto which materials can be hoisted for handling will have side rails or equivalent guards of standard specifications.

- Wall opening barriers (rails, rollers, picket fences, and half doors) must be of such construction and mounting that, when in place at the opening, the barrier is capable of withstanding a load of at least 200 pounds applied in any direction (except upward) at any point on the top rail or corresponding member.
- Wall opening grab handles must be not less than 12 inches in length and must be so mounted as to give 3 inches clearance from the side framing of the wall opening. The size, material, and anchoring of the grab handle must be such that the completed structure is capable of withstanding a load of at least 200 pounds applied in any direction at any point of the handle.
- Wall opening screens must be of such construction and mounting that they are capable of withstanding a load of at least 200 pounds applied horizontally at any point on the near side of the screen. They may be of solid construction, of grillwork with openings not exceeding 8 inches long, or of slat-work with openings not more than 4 inches wide with length unrestricted.

4.4.2.2 Chute wall openings. Chute wall openings from which there is a drop of more than 4 feet must be guarded by one or more barriers or as required by the conditions.

4.4.2.3 Window wall openings. Window wall openings at a stairway landing, floor, platform, or balcony from which there is a drop of more than 4 feet and where the bottom of the opening is less than 3 feet above the platform or landing must be guarded by standard slats, standard grill work, or standard railing. Where the window opening is below the landing or platform, a standard toe board must be provided.

4.4.2.4 Temporary wall openings. Temporary wall openings must have adequate guards but these need not be of standard construction.

- Where there is a hazard of materials falling through a wall hole, and the lower edge of the near side of the hole is less than 4 inches above the floor, and the far side of the hole more than 5 feet above the next lower level, the hole must be protected by a standard toe-board, or an enclosing screen either of solid construction.

## 4.5 Protection of Open-Sided Floors, Platforms, and Runways

- 4.5.1 Open-sided floors or platforms. Open-sided floors or platforms 4 feet or more above adjacent floor or ground level must be guarded by a standard railing on all open sides except where there is entrance to a ramp, stairway, or fixed ladder. The railing must be provided with a toe-board beneath the open sides where:
- 4.5.1.1 Persons can pass
  - 4.5.1.2 There is moving machinery
  - 4.5.1.3 There is equipment with which falling materials could create a hazard.
- 4.5.2 Runways. Runways must be guarded by a standard railing on all open sides 4 feet or more above floor or ground level. Wherever tools, machine parts, or materials are likely to be used on the runway, a toe-board must also be provided on each exposed side. Runways used exclusively for special purposes (such as oiling, shafting, or filling tank cars) may have the railing on one side omitted where operating conditions necessitate such omission, providing the falling hazard is minimized by using a runway of not less than 18 inches wide.
- 4.5.3 Open-sided access ways. Regardless of height, open-sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units, and similar hazards must be guarded with a standard railing and toe board.

## 5. Safety Information

### 5.1 Stairs, Railings, and Guards

- 5.1.1 Flights of stairs having four or more risers must be equipped with standard stair railings or standard handrails. The width to be measured clear of all obstructions except handrails:
- 5.1.1.1 On stairways less than 44 inches wide having both sides enclosed, at least one handrail, preferably on the right side descending.
  - 5.1.1.2 On stairways less than 44 inches wide having one side open, at least one stair railing on open side.
  - 5.1.1.3 On stairways less than 44 inches wide having both sides open, one stair railing on each side.
  - 5.1.1.4 On stairways more than 44 inches wide but less than 88 inches wide, one handrail on each enclosed side and one stair railing on each open side.
  - 5.1.1.5 On stairways 88 or more inches wide, one handrail on each enclosed side, one stair railing on each open side, and one intermediate stair railing located approximately midway of the width.

- 5.1.2 Winding stairs must be equipped with a handrail offset to prevent walking on all portions of the treads having width less than 6 inches.
- 5.1.3 Standard railings. A standard railing must consist of top rail, intermediate rail, and posts, and must have a vertical height of 42 inches nominal from upper surface of top rail to floor, platform, runway, or ramp level. The top rail must be smooth-surfaced throughout the length of the railing. The intermediate rail must be approximately halfway between the top rail and the floor, platform, runway, or ramp. The ends of the rails must not overhang the terminal posts except where such overhang does not constitute a projection hazard.
- 5.1.4 Stair railings. A stair railing must be of construction similar to a standard railing but the vertical height must be not more than 34 inches or less than 30 inches from upper surface of top rail to surface of tread in line with face of riser at forward edge of tread.
- 5.1.5 Wood railings. Wood railings, the posts must be of at least 2 inch by 4 inch stock spaced not to exceed 6 feet; the top and intermediate rails must be of at least 2 inch by 4 inch stock. If top rail is made of two right-angle pieces of 1 inch by 4 inch stock, posts may be spaced on 8 foot centers, with 2 inch by 4 inch intermediate rail.
- 5.1.6 Pipe railings. Pipe railings, posts and top and intermediate railings must be at least 1 1/2 inches nominal diameter with posts spaced not more than 8 feet on centers.
- 5.1.7 Structural steel railings. Structural steel railings, posts and top and intermediate rails must be of 2 inch by 2 inch by 3/8 inch angles or other metal shapes of equivalent bending strength with posts spaced not more than 8 feet on centers.

## 5.2 Housekeeping

- 5.2.1 General Company Policy. All offices, work stations, work areas, passageways, storerooms, restrooms, and service rooms must be kept clean, orderly, sanitary, and free of known hazards.
  - 5.2.1.1 The floor of every workroom must be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used drainage must be maintained and false floors, platforms, mats, or other dry standing places will be provided where practicable.
  - 5.2.1.2 To facilitate cleaning every floor, work place, and passageway must be kept free from protruding nails, splinters, holes, or loose boards or other hindrances that would prevent efficient maintenance.
  - 5.2.1.3 Sufficient illumination will be provided in all areas at all times. Employees discovering lighting deficiencies will report them to the Safety Officer for correction.

- 5.2.2 Work areas. All employees are responsible for maintaining their immediate work areas in a clean, orderly manner and for notifying maintenance of conditions beyond their control.
- 5.2.3 Machines and equipment. Supervisors will ensure that machines and equipment under their control are maintained in a clean, orderly manner. Crowding should be avoided where ever possible.
- 5.2.4 Aisles. All employees are responsible to ensure that aisles are kept clean, free of material, finished parts, scrap, or any type of debris.
- 5.2.5 Floors. Maintenance will ensure that all floor spaces are maintained in a clean, orderly manner.
- 5.2.6 Walls and ceilings. Maintenance will ensure that all wall spaces are properly painted and maintained in a clean, orderly manner. Postings will be confined to bulletin boards and other appropriate areas.
- 5.2.7 Storage facilities. Appropriate procedures will be followed based on the type of storage facility.
- 5.2.8 Employee facilities. Lockers will be used to protect personal belongings from theft. Locker areas will be kept in a clean, orderly manner. Belongings found insecure will be turned over to the Safety Officer or area supervisor for disposition.
- 5.2.9 Emergency exit doors. Will be kept free of any obstacles at all times. Any employee finding an emergency door blocked should immediately report the condition to Safety Officer for correction. Exit lights and signs will also be maintained in proper condition at all times and immediately reported if deficient.
- 5.2.10 Spills (trained personnel). Spills will be contained immediately by any employee trained in spill containment and immediately reported to the Safety Officer or area supervisor.
- 5.2.11 Spills (untrained personnel). Spills will be immediately reported to the Safety Officer or area supervisor by any employee discovering the spill not having training in containment measures.

## **6. Training and Information**

- 6.1 Employees, supervisors and staff members should be informed of the proper materials handling and storage procedures to ensure that such materials do not cause hazardous situations to occur.
- 6.2 Employees exposed to fall above 4' in general industry and 6' in construction, providing construction, repair or renovation work should be trained in the proper use of Fall Protection Systems, coverings, or guardrail systems and other requirements to ensure the appropriate level of protection and safety.
- 6.3 Employer must ensure walking-working surfaces are inspected, regularly and as necessary to maintain and correct, repair, or guard against hazardous conditions.

## 7. Definitions

- Ø *Floor hole* - An opening measuring less than 12 inches but more than 1 inch in its least dimension, in any floor, platform, pavement, or yard, through which materials but not persons may fall; such as a belt hole, pipe opening, or slot opening.
- Ø *Floor opening* - An opening measuring 12 inches or more in its least dimension, in any floor, platform, pavement, or yard through which persons may fall; such as a hatchway, stair or ladder opening, pit, or large manhole. Floor openings occupied by elevators, dumb waiters, conveyors, machinery, or containers are excluded.
- Ø *Handrail* - A single bar or pipe supported on brackets from a wall or partition, as on a stairway or ramp, to furnish persons with a handhold in case of tripping.
- Ø *Platform* - A working space for persons, elevated above the surrounding floor or ground; such as a balcony or platform for the operation of machinery and equipment.
- Ø *Runway* - A passageway for persons elevated above the surrounding floor or ground level, such as a footwalk along shafting or a walkway between buildings.
- Ø *Standard railing* - A vertical barrier erected along exposed edges of a floor opening, wall opening, ramp, platform, or runway to prevent falls of persons.
- Ø *Standard strength and construction* - Any construction of railings, covers, or other guards that meets the requirements of 29 CFR 1910.23.
- Ø *Stair railing* - A vertical barrier erected along exposed sides of a stairway to prevent falls of persons.
- Ø *Toe-board* - A vertical barrier at floor level erected along exposed edges of a floor opening, wall opening, platform, runway, or ramp to prevent falls of materials.
- Ø *Wall hole* - An opening less than 30 inches but more than 1-inch-high, of unrestricted width, in any wall or partition; such as a ventilation hole or drainage scupper.
- Ø *Wall opening* - An opening at least 30 inches high and 18 inches wide, in any wall or partition, through which persons may fall; such as a yard-arm doorway or chute opening.

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# TRAINING ATTENDANCE ROSTER WALKING AND WORKING SURFACES

***Walking and Working Surfaces Training Includes:***

- *Housekeeping*
- *Aisles and Passageways, Covers and Guardrails*
- *Floor and Wall Openings and Protective Measures*
- *Stairs, Ladders and Scaffolding*

<b><u>INSTRUCTOR:</u></b>	<b><u>DATE:</u></b>	<b><u>LOCATION:</u></b>
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NAME (Please Print) FIRST - MI - LAST	SIGNATURE
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By signing below, I attest that I have attended the safety training for the topic indicated, and will abide by the safety information, procedures, rules, regulations and/or company policy as presented and instructed


Name of Interpreter, if utilized: \_\_\_\_\_

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# **Working in Extreme Temperatures**

## PROGRAM OVERVIEW

# WORKING IN EXTREME TEMPERATURES SAFETY PROGRAM

OSHA Act Paragraph 5, A, 1 (General Duty Clause)

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**INTRODUCTION:** Exposure to extreme heat or cold stress in the workplace must be controlled. This safety program is intended to address issues and identify the specific temperature hazards where work is performed, communicating information concerning these hazards, and establishing appropriate procedures and protective measures for employees. Control or protective measures must be implemented at ranges above 90°F or below 62°F, and short duration exposures to temperatures <45°F or >100°F (including wind chill factors).

### **TRAINING:**

When working in extreme temperatures, employees will be provided with hazard information and/or training, upon initial assignment and as needed. This training may be required in some states.

### **ACTIVITIES:**

- Monitor workplace temperatures
- Ensure employees and supervisors are able to recognize early signs and symptoms of cold and heat intolerance
- Provide engineering controls, work practices and protective equipment to reduce exposure levels to the lowest achievable level
- Ensure the availability of water or other appropriate beverages to employees
- Provide appropriate medical care to employees who have symptoms of a temperature-related condition
- Perform periodic inspections to identify any recognized risk factors, situations where actions may be needed to reduce employee exposures, and any deficiencies in the procedures or protective equipment requirements of the area

### **FORMS:**

- Training Attendance Roster

### Table of Contents

1. Purpose
2. Scope
3. Responsibilities
4. Procedure
5. Safety Information
6. Training Information & Requirements
7. Definitions

## Working in Extreme Temperatures

1. **Purpose.** This program outlines some of the safety requirements and precautions needed to protect employees who work in temperature extremes. Extreme heat or cold presents unique hazards to employee health and safety, including reduced awareness of their surroundings and reduced dexterity and ability for the human body to function normally.
2. **Scope.** Applies to any work area where employees must work for more than an hour in an area where the temperature range is above 90°F or below 62°F, or short-duration (15 minutes or less) exposures to <45°F or >100°F (including wind chill factors).

### 3. Responsibilities.

#### 3.1 Management and Supervisors:

- 3.1.1 Monitor workplace temperatures
- 3.1.2 Provide engineering controls, work practices and protective equipment to reduce exposure levels to the lowest achievable level
- 3.1.3 Ensure employees and supervisors are able to recognize early signs and symptoms of cold/heat intolerance such as weakness, muscle cramps, shivering, headache, nausea, inability to do complex motor functions, lethargy, heavy sweating, and mild confusion.
- 3.1.4 Employers should have an emergency plan in place that specifies what to do if a worker has signs of cold/heat-related illness, and ensures that medical services are available if needed
- 3.1.5 Ensure the availability of water or other appropriate beverages to employees
- 3.1.6 Employers should take steps that help workers become acclimatized (gradually build up exposure to heat), especially workers who are new to working in the heat or have been away from work for a week or more. Gradually increase workloads and allow more frequent breaks during the first week of work
- 3.1.7 Ensure that employees who have symptoms of a temperature-related condition have access to a health care provider, should they wish to seek medical treatment.

#### 3.2 Employees:

- 3.2.1 Follow proper work practices and procedures to help protect their health and safety.
- 3.2.2 Be aware of the signs and symptoms of cold/heat related illness and injuries (frostbite or other cold related injuries; heat stroke or other heat related injuries) and report such symptoms to your supervisor immediately.

- 3.2.3 Wear appropriate clothing and attire, and use provided protective equipment as needed or required to assist the body in managing the effects of extreme temperatures.
- 3.2.4 Participate in training

#### 4. Procedure.

##### 4.1 Control Measures:

- 4.1.1 Engineering controls will be implemented to reduce exposures to the lowest level achievable. Where controls are insufficient, they will be supplemented by the use of safe work practices.
  - 4.1.1.1 Engineering controls may include temperature regulators, spaces for warm-up or cool-down to acclimate employees to temperature extremes, protective enclosures or specialized tools to reduce the demands of activity on the body.
  - 4.1.1.2 When the temperature of surrounding solid objects are cold enough to cause skin damage the hazard will be reduced by insulating or shielding either the object or the skin whenever possible, or otherwise isolating the cold source from contact.
- 4.1.2 Work practices will be introduced to reduce the effects of cold/heat when engineering controls are not adequate or are not feasible.
  - 4.1.2.1 Work practices may include written procedures, time restrictions for extreme temperature exposures, increased recovery or warm-up time, increasing the number of employees per task, providing adequate water to hydrate employees with exposure, and encouraging physical fitness in employees.
- 4.1.3 Protective equipment and clothing will be provided when engineering controls and work practices are not sufficient to reduce employee exposures to acceptable levels.
  - 4.1.3.1 Protective equipment includes standard insulated clothing for cold or hot conditions (coats, cooling bandanas, gloves, hats, face protection, thermal clothing), specialized temperature regulated clothing (cool down or warm up vests), and shelter from sun or cold environments.
  - 4.1.3.2 Access to shade, heated or cooling environments will be provided for employees suffering from heat illness or cold exposure believing a preventative recovery period is needed. Shade areas should have access to the open air or be provided with ventilation or cooling equipment such as fans, air conditioners or misting equipment. Be sure workers in extreme cold conditions take a frequent short break in warm dry shelters to allow their bodies to warm up.

## 4.2 Cold/Hot Weather Alert Safety Program:

4.2.1 In the event of an alert from the National Weather Service or local weather forecast services, the following should be considered:

4.2.1.1 Postpone tasks which are not urgent

4.2.1.2 Increase the number of workers in each team in order to reduce each workers heat or cold exposure.

4.2.1.3 Increase rest allowances.

4.2.1.4 Restrict overtime work, as needed.

## 5. Safety Information.

### 5.1 Hot Work Areas:

5.1.1 The major conditions that cause heat related stress are high temperatures and humidity, sun exposure, and exposure to heat emitting equipment

5.1.2 Symptoms of heat stress include weakness, heavy sweating, nausea, unsteady gait, irritability, disorientation, changes in skin color or general malaise.

5.1.3 If heat stress is recognized and treated appropriately early, a more serious condition such as heat stroke (vomiting, hot/dry skin, seizures, unconsciousness) likely can be prevented; therefore, it is important to identify and treat as early as possible.

5.1.4 Treatment for heat stress generally includes drinking cool water and rest. Water (including drinking-fountains or individual drinking cups) will be provided. In general employees should be encouraged to drink cool water (50-59°F) at about one-cup (5-7 oz.) every 20 minutes to remain hydrated in extreme heat situations.

5.1.5 Warning signs may be required at entrances to work areas, buildings or enclosures where there is a reasonable likelihood of heat stress and other heat related conditions.

### 5.2 Cold Work Areas:

5.2.1 The major conditions that cause cold related stress are low temperatures, wind chill, dampness or humidity, and cold water.

5.2.2 Symptoms of cold stress include shivering, fatigue, slurred speech, confused behavior, dilated pupils, and numbness in the extremities.



- 5.2.3 If cold stress is recognized and treated appropriately early, a more serious condition such as hypothermia and frostbite (uncontrollable shivering, numbness, discolored skin in extremities) likely can be prevented; therefore, it is important to identify and treat as early as possible.
- 5.2.4 Inadequate or wet clothing increases the effects of cold on the body.
- 5.2.5 Treatment for cold stress generally includes moving the affected employee to a warm area, removing any wet clothing, drinking warm sweetened liquids and rest.
- 5.2.6 Warning signs may be required at entrances to work areas, buildings or enclosures where there is a reasonable likelihood of cold stress and other cold related conditions.

## 6. Training and Information.

- 6.1 Upon initial assignment, and as needed thereafter for refresher training, employees will be provided with information and/or training in the hazards associated in working in extreme temperatures. They will be provided with the means to protect themselves from extreme heat or cold working conditions.
- 6.2 Employees should understand the environmental and personal risk factors.
- 6.3 Supervisors should understand all of the employee requirements as well as the procedures to follow to implement the requirements and the procedures to follow for contacting and implementing emergency medical response. These procedures should be in writing and maintained.

## 7. Definitions.

- *Acclimatization* - means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.
- *Cold Work Area* – An area where the temperature (including wind chill) is lower than 62 degrees Fahrenheit.
- *Hot Work Area* – An area where the temperature exceeds 90 degrees Fahrenheit
- *Environmental risk factors for heat illness* - means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and duration, protective clothing and personal protective equipment worn by employees.

- *Extreme Temperature* –Extreme temperature takes into account wind chill and other environmental factors that reduce or increase the ambient air temperature. With such factors included, extreme temperatures are either a constant working temperature of <62°F or >90°F, or short-duration (15 minutes or less) exposures to <45°F or >100 degrees Fahrenheit.
- *Heat Illness* - means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.
- *Personal risk factors for heat illness* - means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.
- *Preventative recovery period* - means a period of time to recover from the heat in order to prevent heat illness.
- *Shade* - means blockage of direct sunlight. Canopies, umbrellas and other temporary structures or devices may be used to provide shade. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool. For example, a car sitting in the sun does not provide acceptable shade to a person inside it, unless the car is running with air conditioning.
- *Wind Chill* – A combination of temperature and wind velocity. Wind chill cools the air further than the ambient temperature of the air. For example, if the temperature is 40°F and the wind velocity is 35 mph, the wind chill provides conditions that equal 11°F.



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