

TD Collins, Inc.

Safety and Health Program ***(Safety First, Second is Too Late!)***

Introduction

This Program follows the Occupational Safety and Health Administration's (OSHA) "Safety and Health Program Management Guidelines", published on January 26, 1989 in the Federal Register. These guidelines were drawn from the experience obtained enforcing the OSHA Act, from the Voluntary Protection Programs (VPP), OSHA programs to recognize excellence in worksite safety and health, from OSHA's Consultation Program, and from public commentary.

The Program contains four basic program elements:

- Management Leadership and Employee Involvement;
- Worksite Analysis;
- Hazard Prevention and Control;
- Training.

Under each element are numerous sub-elements. This program contains descriptions of how the program elements and sub-elements are designed and implemented. Specific documents resulting from program implementation will need to be kept in an organized fashion such as:

MAINTAINANCE FACILITY SAFETY AND HEALTH PROGRAM

Management Leadership and Employee Involvement

Management commits the necessary resources of staff, money, and time to ensure that all persons on the worksite are protected from injury and illness hazards. In addition, management visibly leads in the design, implementation, and continuous improvement

of the site's safety and health activities. Specifically, the highest level management establishes and reviews annually the site's safety and health policy and ensures that all employees know, understand, and support that policy. All management levels, with input from hourly employees, develop an annual safety and health goal with objectives and action plans to reach that goal. At the end of each year all management levels, with input from hourly employees, evaluate progress in accomplishing the action plans, achieving all objectives, and meeting the annual goal. This evaluation, which also includes an evaluation of the overall safety and health program, results in a written report that includes the next year's goal, objectives, and action plans, including any remaining action needed to accomplish the current year's goal.

Management ensures that all employees, including themselves, have clearly written safety and health responsibilities included within their job description, with appropriate authority to carry out those responsibilities. Also, management ensures that all employees, including all levels of management, receive performance evaluations that include a written evaluation of the accomplishment of assigned safety and health responsibilities.

Management ensures that all visitors to the site, including contract and temporary labor, co-op students, interns, vendors, and sales people, have knowledge of site hazards applicable to them and how to protect themselves against those hazards, including emergency alarms and procedures. Management also ensures that these visitors do not introduce to the site hazards that can be prevented or that are not properly controlled.

Management ensures that at least several avenues exist for employee involvement in safety and health decision making and problem solving. These avenues may include serving on committees and ad hoc problem solving groups, acting as safety observers, assisting in training other employees, analyzing hazards inherent in site jobs and how to protect against those hazards (writing JHAs), and planning activities to heighten safety and health awareness. Management encourages employees' involvement and devises appropriate recognition for outstanding employee participation.

Documents to implement this element:

- Worksite policy (note how this policy is communicated to the work force and visitors);
- Current year's goals, objectives, action plans, and program evaluation;
- Job descriptions that include safety and health responsibilities;
- Performance evaluations that include an evaluation of safety and health responsibilities;

- Budget showing money allocated to safety and health;
- Contractor bidding proposal sheets showing all contractors' prior safety and health record;
- Orientation outline for all site visitors, including contractors;
- Evidence of employee involvement, such as committee minutes or other records of employee participation in safety and health program decisions.

Worksite Analysis

Management will partner with Federal and State Agencies and hire outside consultants as necessary to conduct baseline surveys that identify all safety and health hazards at the site at the time of the survey. All hazards found during these surveys are eliminated whenever possible or controlled. All employees who may encounter the controlled hazards are trained in appropriate job procedures to follow to protect themselves from these hazards.

Management establishes change procedures to follow whenever the site experiences changes in equipment, material, or processes. To ensure employee protection, these change procedures include consideration of safety and health in the selection of the change, equipment and process shut down procedures, start up procedures, and phase hazard analysis. Appropriate employees are trained to follow these procedures.

Management and employees work together to analyze safety and health hazards inherent in each job site and to find means to eliminate those hazards whenever possible, and otherwise to protect persons against those hazards. These job hazard analyses (JHAs) are revised as appropriate, for example, following a change in the job, the reappearance of a hazard, or an accident at this job.

All employees at this site are trained to recognize hazards and to report any hazard they find to the appropriate person so that the hazard can be corrected as soon as possible. In addition to taking immediate action to report a hazard orally and to provide interim protection, if necessary, including stopping the work causing the hazard, employees may submit a safety work order to the maintenance department, or they may submit a safety suggestion form. Safety work orders take priority over any other work order. Safety suggestions will be considered each week during the site inspection by the site inspection team. All employee reports of hazards must be eventually written, with the correction date recorded. These reports are posted in the lunch room until the hazard is corrected and then are kept on file in the owner's office for three years. During that time they are available for employee review.

Site management, with input from an hourly employee chosen by lot, organizes the monthly site inspection team. Membership on these teams rotates each month with the goal that all site employees serve one month each year. Teams consist of four people, two managers or supervisors and two hourly employees. Each week, at the beginning of work on Wednesday morning, the team inspects the entire worksite, in writing describing all hazards found, including their location. The team assigns appropriate persons responsible for seeing that the hazard is corrected and documenting the date of the correction. These inspection reports are posted in the lunch room, in the maintenance shop, and in the owner's office. A hazard remains on the monthly report until it is corrected.

Any near miss, first aid incident, or accident is investigated by the trained team selected each year by the owner and an hourly employee. The team consists of two managers or supervisors and two hourly employees, each of whom has received training in accident investigation. All investigations have as a goal the identification of the root cause of the accident, rather than assigning blame. All accident reports are posted in the lunch room and are open to comment by any employee. The accident investigation team assigns responsibility to appropriate employees for correcting any hazards found and for assigning a date by which the correction must be completed.

As part of the annual safety and health program evaluation, the site owner, a manager, and an hourly employee review all near misses, first aid incidents, and entries on the OSHA 300 Log, as well as employee reports of hazards, to determine if any pattern exists that can be addressed. The results of this analysis are considered in setting the goal, objectives, and action plans for the next year.

Documents to implement this element:

- Results of baseline safety and health surveys, with notation of hazard correction;
- Forms used for change analyses, including safety and health considerations in the purchase of new equipment, chemical, or materials;
- JHAs;
- Employee reports of hazards;
- Site safety and health inspection results, with hazard corrections noted;
- Accident investigation reports, with hazard corrections noted;
- trend analyses results.

Hazard Prevention and Control

Management ensures that the this priority is followed to protect persons at this site: (1)

Hazards will be eliminated when economically feasible, such as replacing a more hazardous chemical with a less hazardous one; (2) Barriers will protect persons from the hazard, such as machine guards and personal protective equipment (PPE); (3) Exposure to hazards will be controlled through administrative procedures, such as more frequent breaks and job rotation.

Management ensures that the worksite and all machinery is cared for properly so that the environment remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees are hired to do the work and are screened and supervised to ensure they work according to the site's safety and health procedures.

All employees, including all levels of management, are held accountable for obeying site safety and health rules. The following four step disciplinary policy will be applied to everyone by the appropriate level of supervisor:

- oral warning;
- written reprimand;
- three day's away from work;
- dismissal.
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Visitors, including contractors who violate safety and health rules and procedures, will be escorted from the site. Should the disciplined person request a review of the disciplinary action, an ad hoc committee of six people, three managers and three hourly workers, chosen by their respective colleagues, will review the situation and make a recommendation to the owner, who reserves the right for final decision. If his decision differs from the committee, he may, within confidentiality strictures, make public his reasons.

The site works with appropriate outside agencies, such as the fire department, the police department, and the hospital to write emergency plans for all potential emergencies, including fire, explosion, accident, severe weather, loss of power and/or water, and violence from an outside source. Desk top drills are conducted monthly so that all employees experience a drill on each type of emergency once a year. A total site evacuation drill focusing on one emergency type, with all work shut down, and coordinated with the appropriate agency, is conducted once a year. Each drill, whether table top or actual evacuation, is evaluated by the drill planning committee, constituted each year with two managers or supervisors and two hourly employees who volunteer. This committee's written report is posted in the lunch room, and supervisors ensure that all employees know the results. When necessary, the emergency procedures are

revised as a result of the evaluation report.

Persons needing emergency care are transported by company van or community ambulance to the hospital, located five miles from the site. Usually that trip can be made in less than ten minutes. Onsite during all shifts designated persons fully trained in cardiac pulmonary resuscitation (CPR), first aid, and the requirements of OSHA's Bloodborne Pathogen Standard, are the first responders to any emergency. These persons are trained by qualified Red Cross instructors. One of these designated persons' safety and health responsibilities is to ensure that first aid kits are stocked and readily accessible in the marked locations throughout the plant. Appropriate personal protective equipment (PPE) is provided for the different types of accidents possible at the site. All emergency responders have been offered the Hepatitis B vaccine.

Management maintains a proactive occupational health program that provides for occupational health professionals from the local hospital to participate in worksite analyses to find and protect employees against all health hazards. This plan provides initial health screening for each employee, appropriate to the hazards with which each employee will be working, and for tracking of any health changes in each employee through periodic physical examinations, post-exposure exams, and exit exam. Certified industrial hygienists conduct periodic air and noise monitoring.

The doctor and occupational health nurse, working on contract for the site, examine health surveillance data to discern changes in overall employee health screening results to discern any trends that need to be addressed. Health professionals, appropriately trained and knowledgeable about site hazards, immediately treat employees for occupational health problems and follow each case until the individual can return full-time to all aspects of his assigned job. These professionals ensure that employee medical records are kept confidentially so that diagnosis and treatment are not divulged, but management does have information about the employee under treatment as to:

- ability to perform job tasks;
- job limitations or accommodations needed;
- length of time the limitations must be implemented.
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Management ensures that supervisors honor these restrictions. This health care is provided free of charge for all employees. The total plan is reviewed annually to assess its effectiveness.

Through consultants, management has assessed all work at this site and determined

that the following OSHA standards apply to the site's work. Individual safety and health programs for each of these standards have been written and implemented. Employees affected by these standards have been trained to understand them and to follow the programs' directions.

The standards are:

- Hazard Communication
- Hearing Conservation
- Bloodborne Pathogens Program
- Confined Space Program
- Lockout/Tagout
- Emergency Evacuation Program
- Required PPE, Including Respiratory Protection

Documents to implement this element:

- Preventive Maintenance Schedule
- Disciplinary program and records
- Site Rules
- Written Programs mandated by OSHA
- Maintenance Records
- Emergency drill procedures and critiques
- Health surveillance and monitoring records
- Reports and investigations of near misses, first aid, and OSHA 300 logs.

Training

Management believes that employee involvement in the site's safety and health program can only be successful when everyone on the site receives sufficient training to understand what their safety and health responsibilities and opportunities are and how to fulfill them. Therefore, training is a high priority to ensure a safe and healthy workplace. Finding time and knowledgeable personnel to do effective training is vital. Each year management pays special attention to the evaluation of the year's training efforts to look for methods of improvement.

Currently, all new employees receive two hours of safety and health orientation before they begin work. When they have learned this material, they begin their assigned job with a trained buddy. For the first day the employee only observes the buddy doing the

job and reads the appropriate JHAs. The second day the new employee does the job, while the buddy observes him/her. For the first six months on the job a new employee is considered a probationer and may not work beyond the line of vision of another employee. Supervisors are strictly charged to ensure that this training process is followed for all new employees and for any employee beginning a new job at the worksite.

All employees are paid for one full day's work (eight hours) beyond their production schedule each pay period. This time is usually split into several sections to attend training classes. A list of training topics, by week, is published each year. Each topic is offered at least twice. Each employee is responsible for ensuring that he/she masters the year's training topics. Completing the year's training is a significant portion of each employee's performance evaluation, including all levels of management. training records are kept by the personnel manager and are available for employee review, upon request.

All employees are encouraged to suggest qualified trainers, including themselves. Management is responsible for ensuring that all training offered at the site is conducted by qualified persons.

Documents to implement this element:

- List of yearly training topics with name of trainer and his/her qualifications.
- Yearly training class schedule with attendance lists
- Individual employee training records with evidence of subject mastery.