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Safety Manual

Pete Delgado
COVENANT SERVICES
148 ROBINDALE W
BANDERA, TEXAS 78003

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1. INTRODUCTION

This manual is intended to be used by site management at each COVENANT SERVICES client facility as a working guide in the implementation and maintenance of their respective safety and health processes.

The program requirements are based on the potential safety hazards, and operating losses to which the company had a foreseeable exposure on the date of publication of this manual. The manual will be revised as necessary to add requirements and procedures involving newly identified exposures.

Periodically, material in this manual will be updated; revised or supplemented to keep the manual current and relevant. All revisions will bear a revision date and will be accompanied by a list of affected pages.

It is impossible to effectively deal with all safety concerns or procedures in a single manual. Many safety related matters involve situation-specific factors which are difficult to anticipate. Accordingly, this manual is not the definitive statement, or the only statement, on company safety concerns or procedures. This manual is a starting point and a good-faith attempt to create a viable, company-wide, safety program and philosophy.

2. SAFETY PHILOSOPHY

Our employees are our most valuable assets. It is our policy that every person is entitled to a safe and healthful place in which to work.

Establishment and maintenance of a safe environment is the shared responsibility between COVENANT SERVICES at all levels of the organization. To this end, every reasonable effort will be made in achieving the goal of accident prevention and health preservation.

Our philosophy is oriented toward affirmative control and minimization of risk to the greatest extent possible. We have a basic responsibility to make the safety of employees a part of our concern. We will be counting on you to do your part in making our program an effective one.

Th success of COVENANT SERVICES will depend how safely each job is performed. There is no job so important–or any activity so urgent–that we cannot take time to work safely.

COVENANT SERVICES will aggressively pursue a plan to minimize accidents and injuries. Should an injury occur, COVENANT SERVICES will provide excellent medical care and return him/her to active work duties as soon as possible.

We consider the safety of our personnel to be of prime importance, and we expect your full cooperation in making our program effective.

(Name of Executive)
(Title of Exec.)

3. PURPOSE

The COVENANT SERVICES Safety Manual serves to document policies and procedures to enable us to implement an effective safety program throughout the organization.

The program contained in this manual has been established to accomplish the following:

- Protect and promote the health and safety of employees, contractors and others that may be affected by the company's business activities.
- Comply with pertinent regulatory obligations.
- Help assure that safety, health, and loss control programs are given the proper priority and attention, and are achieving the required results.
- Coordinate safety, health, and loss control activities while maintaining consistency in procedures at the required level of performance.
- Assist new and existing facilities in developing and/or revising safety, health, and loss control programs by interacting with each facility and providing external resources to ensure consistency with this purpose.

4. PRINCIPLES

An effective occupational, health and safety program should be maintained. This program is basic to the principles of safe operations and requirements of our business. COVENANT SERVICES in keeping with these principles and goals will provide the most qualified personnel and adequate facilities and equipment. The following principles are fundamental to a successful operation:

FUNDAMENTAL PRINCIPLES

- Appropriate programs need to be implemented to protect employee health and safety and to minimize accidents.
- Occupational injuries and illnesses arepreventable.
- Management seeks to define, initiate and maintain programs and procedures to prevent injuries and illnesses.
- Continuing scrutiny of programs and ongoing employee training and education in occupational health and safety are essential program elements.

GOALS

- Minimize health and safety risks by providing safe and healthful work environments, preventing unsafe acts and controlling exposures to health and safety hazards in the workplace.
- Provide and assure appropriate health and safety programs exist and are in the place.
- Control health hazards in the workplace and assure that employees are informed of hazards and how to protect themselves from overexposure.

- Communicate to employees all mandated medical findings and advise appropriate actions to be taken.
- Maintain medical records in a confidential manner.
- Assure all managers and employees have received orientation, instruction and training in health, safety and environmental protection matters.
- Require that all health, safety, and loss control practices, standards, laws and regulations be observed relating to people, facilities, materials, processes, wastes and the environment.

5. RESPONSIBILITIES

Facility Management

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

Company Employees

- All employees are responsible to learn and comply with safety and health rules and regulations applicable to their work. It is their responsibility to support the company in providing a safe place to work, and to protect themselves and co-workers against injuries or illnesses.
- Employees should report all safety and health hazards to supervisors and take all necessary actions to establish an immediate temporary control of the hazard until permanent control can be established.
- Employees should immediately report all accidents or incidents occurring on the job to their supervisor.
- Employees should cooperate and assist in the investigation of all accidents or incidents.
- Employees should utilize all personal protective equipment provided.

Facility Safety Coordinator

- Responsible for having access to a current copy of applicable Federal, State and local safety and health regulations.
- Responsible for implementation of loss control program.
- Responsible for implementation and monitoring safety training.

- Participate in or Chair Safety Committee.
- Recommend safety-training programs.
- Review and recommend changes in the safety program as the need is identified.
- Responsible for all required non-confidential records.
- Conduct annual safety assessment, analysis, and review.
- Responsible for maintaining a system to provide first aid supplies and secures prompt medical attention for injured employees.
- Responsible for assuring proper notification, internal and external, in the event of an accident, incident or fatality.

Safety Committee

- Meet monthly.
- Review all accident reports, determine preventability, and identify appropriate corrective actions.
- Conduct safety inspections.
- Review employee safety suggestions.
- Recommend and assist in establishing additional general safety rules as the need is identified.
- Develop and monitor a safety improvement plan with respect to company activities.

Prepare a written Safety Committee of the topics discussed, agreements made, accidents reviewed, self-inspection results, and anticipated future committee activities.

6. TWO-WAY COMMUNICATION

COVENANT SERVICES believes in active, continuing communication between management and employees.
Employees are encouraged to communicate with their supervisors at any time.
Management will communicate frequently with employees on matters of employee health and safety.
This communication may take many forms, including but not necessarily limited to the following:

- Meetings
- Training programs
- Postings
- Letters or newsletters

We encourage anonymous contributions and will publicize management's responses.
We will maintain a record of activities that can be considered part of two-way communication:
See **Appendix**

A, Two-Way Communication Record.

7. SITE SPECIFIC RESPONSIBILITIES

Program	Person	Title	Phone Number
Employee Orientation			
Safety Committee			
Safety Rules			
Accident Reporting and Investigation			
Ergonomics			
First Aid			
Bloodborne Pathogen Program			
Machine Guarding			
Lockout / Tagout & Energy Control Plan			
Confined Space			
Hearing			
Hazard Communication			
Personal Protective Equipment			
Emergency Response			
Hot Work and Fire Prevention			

Appendix A

TWO WAY COMMUNICATION RECORD

DATE	TIME	MANAGEMENT REPRESENTATIVE	EMPLOYEE	SUBJECT

SUBJECT: **EMPLOYEE ORIENTATION** **12/07/2016**

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1. PURPOSE

Employee orientation is critical to ensure that all new or transferred employees are aware of the hazards and injury exposures present in both their specific job position and the overall work environment.

2. RESPONSIBILITIES

1. The Safety Leader and Department Supervisor are responsible for assuring that required training takes place

2. Department Forman/Supervisors are responsible for coordinating training.

3. Department Forman/Supervisors should review the orientation checklist, which becomes a permanent Human Resource document.

The Employee Orientation Process

During the initial orientation to all clients we should inform the employee of the following:

1. Required personal protective equipment and where and when it is to be used.
2. General hazards and hazards specific to the job assigned.
3. Safety rules.
4. Hazard Communication Program.
5. Injury Prevention Program.

Each new employee should complete Appendix A, Orientation Checklist.

Appendix A

ORIENTATION CHECKLIST

PARTNER _____ **DEPARTMENT** _____

DATE HIRED _____ **SUPERVISOR** _____

DATE REVIEWED _____

	Completed	N/A	Date
1. Company safety policy statement and copy of rules provided and explained			
2. Reviewed injury reporting procedures			
3. Reviewed COVENANT SERVICES Safe Work Practices			
4. Reviewed Personal Protective Equipment and use			
5. Reviewed Lockout/Tagout Procedure			
6. Reviewed Safe Lifting Techniques			
7. Reviewed housekeeping procedures			
8. Reviewed location of first aid kits			
9. Reviewed Hazard Communication Program			
10. Reviewed facility hazards			
11. Reviewed specific job hazards			
12. Reviewed Disciplinary Program			
13. Reviewed Evacuation Procedures and Duties			
14. Reviewed Machine Guarding Program			
15. Reviewed Ergonomics Program			
16. Reviewed Hearing Conservation Program			
17. Reviewed Emergency Response and Fire Prevention Programs			
18. Reviewed Fall Protection Plan			

I acknowledge that information on the above subjects was furnished to me during my orientation.

EMPLOYEE'S SIGNATURE_____DATE_____

SUPERVISOR SIGNATURE_____DATE_____

Sign and return the original copy immediately to the Personnel Office following the employee's date of hire or review. Retain a copy in the employee's departmental file.

SUBJECT: EMPLOYEE SAFETY MEETINGS AND COMMUNICATION 12/07/2016

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1. PURPOSE

To provide COVENANT SERVICES employees on-going basic safety training, information, and an avenue for safety communication.

2. RESPONSIBILITIES

1. Supervisors (or others designated by management) will be responsible for conducting Employee safety training.

2. Safety meetings may be held during regular office meetings or at other times as circumstances dictate but should be performed on at least a monthly basis.

3. Location Manager will distribute safety topic outlines and information for each meeting.

4. Documentation of Employee Safety Meetings should be performed by completing a Safety Meeting Sign in Sheet – see Appendix A, Employee Safety Meetings.

Steps for Making Employee Safety Meetings Successful

1. Prepare for the meeting by reviewing the subject matter that is to be discussed in advance.

2. Gather Employees into a group so that the speaker can be easily heard.

3. Start on time.

4. Give Employees an opportunity to report safety concerns and give suggestions.

5. Report progress on correcting unsafe conditions previously reported.

6. Discuss all accidents and close calls experienced by the group. Determine how to prevent a recurrence.

7. Discuss the company's safety record – Good or Bad.

8. Plan the meeting around the designated safety topic and handouts. Have workplace props available to reinforce safety points or topics.

9. Get the Employees involved by asking questions.

10. The meeting should run between 20-30 minutes.

Suggested Monthly Safety Meeting Topics

January	Hazard Communication Program
February	Bloodborne Pathogens/First Aid
March	Personal Protective Equipment
April	Lifting/Manual Handling
May	Fire and Emergency Plan
June	Machine Guarding
July	Lockout/Tagout Program
August	Hearing Conservation
September	Holiday/Winter Safety at Work and Home
October	Ladder Safety / Slips Trips and Fall Prevention
November	Review Safety Rules
December	Optional topic

This topic agenda may be altered to fit a specific location's needs or accident trends. OSHA requires several of these topics to be conducted annually.

Videos to supplement the training are available on a variety of topics. If training media is desired, please contact the Director of Safety and Risk for ordering information.

1. PURPOSE

Safety committees are an integral part of the COVENANT SERVICES safety process. Each facility should have an active Safety Committee to facilitate accident review discussions, site self-inspections, and implementation of site-specific loss control action plans.

2. RESPONSIBILITIES

1. Each facility should have an active Safety Committee which meets each period/monthly.
2. The group should consist of 5 – 10 % of the Employee population, which represent management, employees from each department, and other appropriate individuals.
3. The goal of the Safety Committee is to review accidents/injuries and their trends, to conduct and/or review all self-inspection reports, and to be responsible for implementing and promoting safety activities at each facility.

SAFETY COMMITTEE OVERVIEW

A Safety Committee should be organized at each facility. The committee is charged with the responsibility of implementing and promoting safety within the facility. The committee should review injuries and accidents as well as accident trends.

The Safety Committee should meet monthly, when appropriate, weekly department head staff meetings and weekly department manager meetings should also be used as forums for discussing safety- related issues.

Representatives on the Safety Committee should consist of:

- One management/supervisor from the facility
- Safety Champion/Safety Team Leader
- One Employee representative from each department
- A record keeper
- Other appropriate individuals
- A team facilitator

On average the committee should consist of 5 – 10 % of the Employee population.

The Safety Committee meetings should have a common agenda, and include:

- Review results of previous ORT and/or MWT safety audits and discuss items noted on previous self-inspections that have yet to be corrected.
- Review accidents, if any, (Employee/company vehicle/public) or injuries, to insure prevention measures are implemented. Accident trends should also be identified and discussed.
- Discuss and recommend future training or other needs as they relate to safety and health issues.
- Review if any new equipment or methods have been or are soon to be introduced. Discuss any new hazards which may be anticipated and evaluate implementation plans.
- Perform a mock Life Safety Check and/or facility safety inspection and document all areas where improvement recommendations are made. The form at the end of this section may be used as a guide to follow during the inspection and for documentation purposes.

3. SAFETY COMMITTEEDUTIES

- Attending all committee meetings
- Promoting safety and health at all times
- Acting as a sounding board on workers' acceptance of safety and health policy
- Receiving, considering, and resolving Employee safety and health complaints
- Providing feedback on workers' suggestions
- Promoting and monitoring compliance with safety and health regulations
- Attempting to raise safety and health standards above legal requirements
- Investigating and advising on refusal to do unsafe work cases
- Assisting in the training of new workers
- Participating in the identification and control of physical hazards
- Participating in assessments and the development of control programs for hazardous substances
- Participating in accident investigations and inquiries
- Conducting safety and health education programs
- Making safety and health recommendations
- Carrying out audit and self-inspections
- Advising on personal protective equipment
- Maintaining records of accidents

- Monitoring effectiveness of safety and health program
- Assisting in the development of safety and health rules
- Assisting in the development of safe work procedures

Topics discussed during Safety Committee meetings should be documented. Appendix A, may be used and posted on the facility and/or departmental bulletin board.

4. HOW TO CONDUCT AN EFFECTIVE SAFETY COMMITTEEMEETING

Good safety meetings require thorough planning. Notices of meetings should be sent to each member of the committee.

The meeting place should be comfortable, well lighted, with no distractions.

1. Call to Order - Meetings should start and finish on time. Allow 30 - 45 minutes for each meeting.

2. Roll Call - Names of member's present should be recorded.

3. Topic Notes - Previous meeting topic notes should be briefly reviewed.

4. Unfinished Business - Any unfinished business should be reviewed with the Employee assigned.

5. Review of Accidents - Accidents should be reviewed with an aim towards preventing recurrences. Facility loss trends or statistics can be reviewed and discussed.

6. Other Activities - Self inspections, environmental health studies, ergonomic studies, surveys, training programs, safety suggestions, and other activities from the past month should be reviewed. A facility self-inspection should also be performed either prior to or during the Safety Committee meeting. The results of the inspection should be reviewed and any recommendations identified should be appropriately delegated for resolution.

7. New Business - Any new issues, programs, problems, etc., should be brought up. Appropriate assignments and due dates, if appropriate, should be given.

8. General Discussion - Any relevant comments or suggestions should be discussed. Guest speakers may also be allotted this time.

9. Adjournment - Set time, date and location of the next meeting. Adjourn on time.

The notes should accurately record decisions made and actions taken since they serve as a means of keeping management informed of the group's work and as a follow-up. Committee members and the Facility's Leaders should receive copies and a copy should be posted on a bulletin board. Copies should be maintained for a minimum of 1 year.

5. PERFORMING SAFETY SELF INSPECTIONS

The safety committee's role in hazard identification and control should include a monthly inspection of the facility including the parking lot and exterior grounds. The inspection is designed to evaluate both physical conditions and Employee work methods which would assist in identifying conditions and work practices that may lead to future Employee or customer accidents.

Safety inspection tours should be approached as if they are preventive maintenance. Every piece of equipment wears down and deteriorates over time. Pieces of equipment need to be checked regularly. Similarly, Employee work procedures fall into routines over time. Some of these are unsafe routines. These practices also need regular re-evaluation to make sure that safe work procedures are being followed.

Audit and inspection objectives should include:

- Spotlight unsafe conditions and equipment
- Focus on unsafe work practices or behavior trends
- Reveal the need for new safeguards

The following Safety Inspection Forms are included in this section:

Appendix A, Safety Committee Minute Form
Appendix B, Facility Safety Inspection Report
Appendix C, Distribution Safety Inspection Report
Appendix D, Office Safety Inspection Report

These are designed to be used as guides while performing this activity. Each facility may choose to either use this self-inspection form or to develop their own location-specific guide. In either case the attached forms should be considered as the minimum standard and if alterations are made they should be in addition to these items.

All safety self-inspections should include documentation of the conditions that were observed, corrective actions which are needed, and when corrective actions were resolved. All inspection records should also be retained onsite for at minimum 1 year.

Appendix A

Pending Business: The following action was taken on business pending before the committee:

Recommendations implemented since last meeting _____

Recommendations under consideration _____

Recommendations set aside _____

New Business: The following attached reports were read, discussed, and approved:

_____

_____

Inspection report of Safety Inspector dated _____

Accidents Reviewed and Preventive Recommendations Made: Injury and accident reports submitted since the last Safety Committee meeting should be reviewed to assist with the identification of accident causes and contributing factors. Accident trends should also be reviewed to focus the committee's direction toward accident types of high frequency, cost, or a combination of both. Discussion notes pertaining to accident trends and prior investigations should be listed below.

_____

_____

_____

_____

Appendix B

FACILITY SAFETY SELF INSPECTION REPORT

Location:	Date:	Inspected By:		
OBSERVED CONDITIONS: Check YES if satisfactory. Check NO if corrective action is required. Check NA if the condition does not apply.				
OFFICE AREAS:	YES	NO	NA	
Flooring in good condition with no trip hazards	D	D	D	
Chairs in good condition	D	D	D	
Stairway handrails secure	D	D	D	
Adequate lighting in work areas	D	D	D	
Electrical power strips, if used, safely arranged and no sign of overloading	D	D	D	
Only UL or FM listed appliances used in office areas (portable heaters/fans, etc.)	D	D	D	
Electrical boxes closed, labeled, breakers identified, and 3’ clearance maintained from storage	D	D	D	
LIFE SAFETY	YES	NO	NA	
All exit ways, doors, and aisles clear and unobstructed	D	D	D	
All exits marked by readily visible exit signs	D	D	D	
Are exit signs visible from all parts of the plant area	D	D	D	
Stairs and railings secure to upper and lower levels	D	D	D	
OCCUPATIONAL HEALTH & SAFETY	YES	NO	NA	
Hearing protection worn in designated areas	D	D	D	
Proper footwear being worn	D	D	D	
MSDSs available for Employee Review	D	D	D	
All containers properly labeled	D	D	D	

Proper hand protection to protect from chemicals	D	D	D	
MACHINE & POWER TRANSMISSION:	YES	NO	NA	
Where Employees are exposed, is a method of guarding provided to protect	D	D	D	
Are all gears, pulleys, and belts properly guarded	D	D	D	
Is a lockout/tagout procedure in place and followed	D	D	D	
ALARMS/FIRE PROTECTION:	YES	NO	NA	
No smoking policy being observed	D	D	D	
Gas cylinders marked for their gas contents	D	D	D	
Gas cylinders secured to prevent tip over	D	D	D	
All solvent soaked rags in self-closing metal containers	D	D	D	
Housekeeping, dust and paper accumulations controlled	D	D	D	
Hot work permits on file	D	D	D	
Fire watch with fire extinguisher present during any hot work	D	D	D	
Alarm pull stations unobstructed and available	D	D	D	
Sprinkler control valves open, unobstructed, and supervised/chained	D	D	D	
Sprinkler heads clear of obstructions and storage (18” minimum)	D	D	D	
Fire Extinguishers fully charged, mounted in designated places, and current inspection tag in place	D	D	D	
Fire hoses unblocked, properly hung	D	D	D	
Flammable/combustible liquids properly stored in sealed containers and/or safety cans	D	D	D	

EMERGENCY EQUIPMENT	YES	NO	NA	
Emergency eye wash stations available and properly maintained	D	D	D	
First aid equipment and emergency telephone phone lists available and updated	D	D	D	
Emergency evacuation plans and routes posted	D	D	D	
Report reviewed with:				Date:
Follow Up Actions Required and Target Date for Completion:				
Follow Up Actions Completion Date:				

Appendix C

DISTRIBUTION SAFETY SELF INSPECTION REPORT

Location:	Date:	Inspected By:

OBSERVED CONDITIONS: Check YES if satisfactory. Check NO if corrective action is required. Check NA if the condition does not apply.

EXTERIOR AREAS:	YES	NO	NA	COMMENTS
Sidewalks in good condition with no cracks/trip hazards	D	D	D	
Parking areas free of holes, standing water, and other similar conditions	D	D	D	
Pre-planning has been performed for inclement weather and appropriate supplies are available	D	D	D	
OFFICE AREAS:	YES	NO	NA	
Carpets/flooring in good condition with no tears/trip hazards	D	D	D	
Chairs in good condition	D	D	D	
Stairway handrails secure	D	D	D	
Adequate lighting in all work areas	D	D	D	
Vending machines in good repair	D	D	D	
Electrical power strips, if used, safely arranged and no sign of overloading	D	D	D	
Only UL or FM listed appliances used in office areas (portable heaters/fans, etc.)	D	D	D	
Electrical boxes closed, labeled, breakers identified, and clearance maintained from storage	D	D	D	
LIFE SAFETY	YES	NO	NA	
All exit ways, doors, and aisles clear and unobstructed	D	D	D	

All exits marked by readily visible exit signs	D	D	D	
Are exit signs visible from all areas	D	D	D	
OCCUPATIONAL HEALTH & SAFETY	YES	NO	NA	
Hearing protection worn in designated areas	D	D	D	
Proper footwear being worn	D	D	D	
MSDS available for Employee Review	D	D	D	

MACHINE & POWER TRANSMISSION:	YES	NO	NA	
Where Employees are exposed, is a method of guarding provided to protect	D	D	D	
All conveyors equipped with appropriate guards	D	D	D	
Are all gears, belts, and pulleys properly guarded	D	D	D	
Can the main power disconnect switches be locked in the “off” position	D	D	D	
Are lockout/tagout procedures implemented and satisfactory	D	D	D	
ALARMS/FIRE PROTECTION:	YES	NO	NA	
Alarm pull stations unobstructed and available	D	D	D	
Sprinkler control valves open, unobstructed and supervised/locked	D	D	D	
Sprinkler heads clear of obstructions and storage (18” minimum)	D	D	D	
Fire Extinguishers fully charged, mounted in designated places, and current inspection tag in place	D	D	D	
Fire hoses unblocked, properly hung	D	D	D	
Flammable/combustible liquids properly stored in sealed containers and/or safety cans	D	D	D	
EMERGENCY EQUIPMENT	YES	NO	NA	

Emergency eye wash stations available, properly maintained and log available for review	D	D	D	
First aid equipment and emergency telephone phone lists available and updated	D	D	D	
Emergency evacuation plans and routes posted	D	D	D	
Report reviewed with:				Date:
Follow Up Actions Required and Target Date for Completion:				
Follow Up Actions Completion Date:				

Appendix D

OFFICE SAFETY SELF INSPECTION REPORT

Location:	Date:	Inspected By:

OBSERVED CONDITIONS: Check YES if satisfactory. Check NO if corrective action is required. Check NA if the condition does not apply.

EXTERIOR AREAS:	YES	NO	NA	COMMENTS
Sidewalks in good condition with no cracks/trip hazards	D	D	D	
Parking areas free of holes, standing water, and other similar conditions	D	D	D	
Pre-planning has been performed for inclement weather and appropriate supplies are available	D	D	D	
LOBBY/OFFICE AREAS:	YES	NO	NA	
Carpets/flooring in good condition with no tears/trip hazards	D	D	D	
Chairs or benches in good condition	D	D	D	
Reception office safely arranged	D	D	D	
Stairway handrails secure	D	D	D	
Adequate lighting in all work areas	D	D	D	
Desks and work areas maintained and in good condition	D	D	D	
Telephone headsets, footrests, and chair armrests; if available used	D	D	D	
ELECTRICAL CONDITIONS	YES	NO	NA	
Electrical boxes closed, labeled, breakers identified, and clearance maintained from storage	D	D	D	
Electrical cords in good condition with 3-prong ground	D	D	D	

Electrical power strips, if used, safely arranged and no sign of overloading	D	D	D	
Only UL or FM listed appliances used in office areas (portable heaters/fans, etc.)	D	D	D	
BREAKROOM AREA	YES	NO	NA	
Chairs and tables in good condition	D	D	D	
Floor conditions – slip and fall exposures controlled – wet floor signs available	D	D	D	
Vending equipment in good condition	D	D	D	
Ice making machines and sinks in good repair with no leaks	D	D	D	
ALARMS/FIRE PROTECTION:	YES	NO	NA	
Alarm pull stations unobstructed and available	D	D	D	
Sprinkler control valves open, unobstructed, and supervised/locked	D	D	D	
Sprinkler heads clear of obstructions and storage (18” minimum)	D	D	D	
Fire Extinguishers fully charged, mounted in designated places, and current inspection tag in place	D	D	D	
Fire hoses unblocked, properly hung	D	D	D	
Flammable/combustible liquids properly stored in sealed containers and/or safety cans	D	D	D	
LIFE SAFETY	YES	NO	NA	
All exit ways, doors, and aisles clear and unobstructed	D	D	D	
All exits marked by readily visible exit signs	D	D	D	
Are exit signs visible from all parts of the plant area	D	D	D	

Emergency lighting available and tested	D	D	D	
EMERGENCY EQUIPMENT	YES	NO	NA	
First aid equipment and emergency telephone phone lists available and updated	D	D	D	
Emergency evacuation plans and routes posted	D	D	D	
Report reviewed with:				Date:
Follow Up Actions Required and Target Date for Completion:				
Follow Up Actions Completion Date:				

1. PURPOSE

Safety rules are established to provide guidance in safe work practices to all COVENANT SERVICES employees.

2. RESPONSIBILITIES

1. Each new partner should receive an initial orientation to their department with a discussion of the following safety rules.

2. A review of these rules should take place whenever a partner is reassigned to a new department or area.

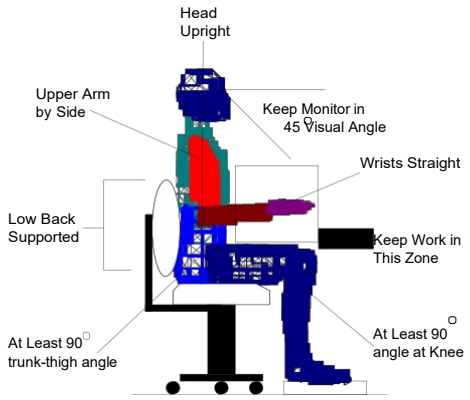
SAFETY RULES

It is not necessary to remember verbatim the following rules; however, it is imperative to thoroughly understand them, realize and remember their importance, and know their general meaning.

OFFICE SAFETY

1. When using file cabinets, never open more than one drawer at a time to avoid tipping.
2. Desk drawers, filing, and storage cabinets should be kept closed when not in use.
3. Floors, work areas, and hallways should be kept cleared of boxes, papers, electric cords, and telephone wires.
4. Chairs shall be kept in a safe condition (properly adjusted, wheels secured, etc.).
5. Inspect electrical wires periodically to be sure that plugs and/or cords are in safe operating condition.
6. Good housekeeping should be maintained always. All spills, whether water, chemicals, grease, oil, or ink, should be quickly cleaned up.
7. Always wear appropriate personal protective equipment when in non-office areas.
8. Refrain from horseplay that could endanger you or your fellow employees.
9. When using ladders or short steps never stand on the top step or the 1st (first) step down from the top, unless there are handrails on the ladder for supporting you.

10. Set your workstation up to meet our ergonomic standards for areas such as comfortable seating, video display terminal (VDT) adjustment, and keyboard/mouse positioning.



GENERAL FACILITY SAFETY RULES

1. All tools and equipment should be maintained in good condition.
2. Damaged tools or equipment should be removed from service, tagged, and power supplies locked out.
3. Only appropriate tools should be used for the job.
4. Do not remove guards from tools or break off ground leads on portable electric tool plugs.
5. Items on the floor that could create a fall (tie straps, paper, etc.) should be picked up as soon as possible.
6. Shoes must be closed at the toe and heel and must be rubber soled. The width of the bottom surface of a shoe's heel (or single piece sole at the heel) should not be less than 90% of the upper heel's widest point. In addition, the instep of the heel (measured from underneath on the sole of the shoe) must not be equal to or greater than 1" (the only exception is for work boots which may have a heel greater than 1" but the width of the heel is consistent from top to bottom).

   Examples of unacceptable shoes include shoes with spike heels (heels with a surface area measuring less than ½ square inch or less than 90% of the upper heel's width – regardless of how tall the heel is).
7. Rings, wristwatches, bracelets, and loose clothing should not be worn around moving equipment.
8. Hair below shoulder length must be restrained.
9. Hearing protection may be required in designated areas and must be worn.
10. Exits, stairways, corridors, passageways, electrical panels, and emergency equipment must be kept clear of obstructions.
11. Broken pallets/skids must be removed from operation as soon as possible.
12. Pallets/skids must not be stacked over 5 ft. high. In sprinkle red buildings no more than 4 stacks of idle pallets can be grouped together (must be separated by 25' of clear space).

13. All injuries must be reported to your supervisor immediately.
14. Running, horseplay and engaging in fighting or instigation of fighting will not be tolerated.
15. Report all suspected hazards to your supervisor.

CONVEYORS

1. If correcting a problem on a conveyor requires you to place your hands near a pinch point, turn the conveyor off and follow lockout procedures before making the correction.
2. Do not climb on top of conveyors whether they are on or off.
3. Do not remove any safety guards on any conveyor while in operation.
4. Emergency off buttons are located throughout the conveyor system, use them if needed.
5. Personnel shall not be allowed on the conveyors while conveyors are moving.

FACILITY SUPPORT

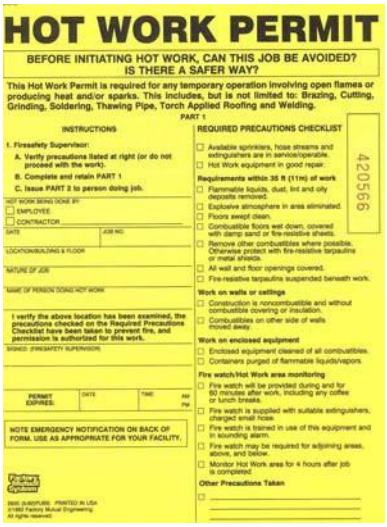
1. Eye protection must be worn when using compressed air for cleaning.
2. Lock out all electrical and air power to machines before servicing.
3. Do not adjust, clean, or attempt to repair moving machinery.
4. Replace all guards when maintenance is complete.
5. Compressed air must be reduced to 30 PSI whenever used for cleaning purposes.
6. Never use compressed air to clean clothing or any part of your body.
7. Always wipe off excess oil on machinery and make sure there is no oil on the floor.
8. When performing any maintenance on powered truck or pallet jack batteries, goggles or a faceguard must be worn.

BALERS

1. Protective guards and access covers shall not be tampered with.
2. For vertical baler, an interlock must be provided that prevents the ram from functioning unless the bale chamber door is closed and latched.
3. Interlocks shall not be tampered with.
4. The baler will not be cleaned without first being locked out according to written procedures (see hazardous energy control program).

WELDING, BURNING, HOT WORK

1. Maintenance and outside contractors should obtain supervisor permission whenever hot work is done outside the welding shop.
2. All areas where hot work has been completed should be inspected and left in a safe condition after the work has been completed.
3. Before welding or cutting is permitted, the individual responsible for these operations should inspect the equipment and the area.
4. All combustibles, liquids or solids, should be removed from the hot work area or protected by fire-resistant curtains if they cannot be removed.
5. Fire-resistant shields should protect exposed combustibles whenever there are openings in the floor or walls of the hot work area (including cracks, holds, windows, etc.).
6. Those performing hot work should wear protective clothing necessary for the specific job they are to work on (i.e. gloves, goggles, helmets, etc.).
7. After welding operations are completed, the welder should mark the hot metal or provide some other means of warning other workers.
8. Adequate screening of welding/cutting operations from others working in or passing through the work area should be set up prior to proceeding with the job and maintained during the process.
9. A fire watch shall be maintained for at least a half-hour after completion of welding/cutting operations to detect and extinguish any possible smoldering fires.
10. The personnel performing the welding/cutting operation should see that they have adequate ventilation for smoke, fumes, gases, etc. generated during the job.



HOT WORK PERMIT

BEFORE INITIATING HOT WORK, CAN THIS JOB BE AVOIDED? IS THERE A SAFER WAY?

This Hot Work Permit is required for any temporary operation involving open flames or producing heat and/or sparks. This includes, but is not limited to: Brazing, Cutting, Grinding, Soldering, Thawing Pipe, Torch Applied Roofing and Welding.

PART 1

INSTRUCTIONS

1. Firesafety Supervisor:
   A. Verify precautions listed at right (or do not proceed with the work).
   B. Complete and retain PART 1
   C. Issue PART 2 to person doing job.

HOT WORK BEING DONE BY:
☐ EMPLOYEE
☐ CONTRACTOR

DATE JOB NO.

LOCATION/BUILDING & FLOOR

NATURE OF JOB

NAME OF PERSON DOING HOT WORK

I verify the above location has been examined, the precautions checked on the Required Precautions Checklist have been taken to prevent fire, and permission is authorized for this work.

SIGNED: (FIRESAFETY SUPERVISOR)

PERMIT EXPIRES: DATE TIME AM PM

NOTE EMERGENCY NOTIFICATION ON BACK OF FORM, USE AS APPROPRIATE FOR YOUR FACILITY.

REQUIRED PRECAUTIONS CHECKLIST

420566

☐ Available sprinklers, hose streams and extinguishers are in service/operable.
☐ Hot Work equipment in good repair.

Requirements within 35 ft (11m) of work
☐ Flammable liquids, dust, lint and oily deposits removed.
☐ Explosive atmosphere in area eliminated.
☐ Floors swept clean.
☐ Combustible floors wet down, covered with damp sand or fire-resistive sheets.
☐ Remove other combustibles where possible. Otherwise protect with fire-resistive tarpaulins or metal shields.
☐ All wall and floor openings covered.
☐ Fire-resistive tarpaulins suspended beneath work.

Work on walls or ceilings
☐ Construction is noncombustible and without combustible covering or insulation.
☐ Combustibles on other side of walls moved away.

Work on enclosed equipment
☐ Enclosed equipment cleaned of all combustibles.
☐ Containers purged of flammable liquids/vapors.

Fire watch/Hot Work area monitoring
☐ Fire watch will be provided during and for 60 minutes after work, including any coffee or lunch breaks.
☐ Fire watch is supplied with suitable extinguishers, charged small hose.
☐ Fire watch is trained in use of this equipment and in sounding alarm.
☐ Fire watch may be required for adjoining areas, above, and below.
☐ Monitor Hot Work area for 4 hours after job is completed

Other Precautions Taken
☐ _____

Factory Mutual Engineering

Example of Hot Work Permit.

1. PURPOSE

Our Accident Reporting and Investigation Program require timely reporting of all accidents and investigation of accident causes and factors. The goal of all accident investigations is to identify corrective measures that will prevent or reduce future similar incidents. Investigations should always be fact finding and not fault finding.

2. RESPONSIBILITIES

1. All incidents should be reported at the time of the incident to COVENANT SERVICES within 24 hours.
2. Appropriate incident reporting documents for Employee Injury must be used.
3. Accident investigation reports should be reviewed by site management and the for completeness and review of corrective actions or measures which were suggested.
4. A follow-up activity should be performed to audit when corrective measures are implemented and their effectiveness.
5. Accident reporting, trending, and corrective measures should be reviewed on at least an annual basis to evaluate the continuous improvementof the program.

ACCIDENT REPORTING & INVESTIGATION OVERVIEW

One critical aspect, which separates an outstanding safety program from an average program, is accident reporting, investigation and follow-up. Timely reporting is critical to ensure prompt medical treatment and investigation of the circumstances surrounding the incident. Proper investigation should uncover the safety hazard and/or unsafe practice(s) that caused the accident. By eliminating the hazard or unsafe practice, future accidents can be reduced.

ACCIDENT INVESTIGATION

- The Facility Manager or Management representative should assure a complete and thorough accident investigation is conducted. Copies of this report should be sent to the Accident Review Committee for processing and follow-up.
- Copies of accident investigation reports should be maintained.

Accident investigations will be conducted by supervisors, who have a responsibility to maintain a safe and healthful work environment for those partners in their work area. All accidents will be investigated. Some of the benefits from prompt and thorough accident investigation are:

- Employees feel there is a genuine concern for their wellbeing.
- Effective accident investigation minimizes lost productive time due to recurring accidents.
- Prompt and thorough accident investigation is evidence of a supervisor's ability and efficiency.

The purpose of an accident investigation is PREVENTION. Through an accident investigation we hope to develop a solution that will prevent recurrence of the type and category of accident under investigation.

RESPONSIBILITY

Supervisor

Supervisors are in the unique position to give special priority and responsibility to the function of accident investigations. Supervisors have the following advantages:

- They know most about the situation.
- They have a personal interest in identifying accident causes.
- They can take immediate action to prevent recurrence of accidents.
- They can communicate more effectivelywith the partner.

Site Manager

Site Managers are responsible for reviewing accident investigations to ensure completion and act on the items identified as possible corrective action.

Site Safety Coordinator

The Site Safety Coordinator will be responsible for reviewing all accident investigation reports and assisting in investigation as needed. The Site Manager as needed will conduct supplemental investigations. Data will be compiled and analyzed on a regular basis to determine accident trends.

How to conduct an Accident Investigation

- **Assure** that first aid or medical treatment has been provided.
- **Go** to the scene of the accident at once, or as soon as possible.

- **Talk** with the injured person, if possible. Talk to witnesses. Stress getting the facts, not placing blame or responsibility. Ask open-ended questions.
- **Listen** for clues in the conversations around you. Unsolicited comments often have merit.
- **Encourage** people to give their ideas for preventing a similar accident.
- **Study** possible causes - unsafe conditions, unsafe practices.
- **Confer** with appropriate persons about possible solutions.
- **Write** your accident report giving a complete, accurate account of the accident. Do not offer opinions.
- **Follow-up** to make sure conditions are corrected. If they cannot be corrected immediately, report this to your supervisor.
- **Publicize** corrective action taken so that all may benefit from the experience.

Completing the Accident Investigation Report

Once the investigation process is complete and the facts are known, preparing the report should not be difficult. Refer to the **Appendix A, Accident Report**, for an example of the Accident Investigation Report. Copies of this report should be made at each facility to help ensure you have an adequate supply.

Appendix A

SUPERVISOR'S ACCIDENT INVESTIGATION

- Injury Involved
- Incident/No Injury Drug Test Required? _____

Location_____

Date of Incident: _____ Time of Incident: ___ AM or PM Shift Worked

Name of Injured Injured Dept. Injured Position

Description of the Injury:

Description of Accident (observe accident site, ask questions, determine facts involved, describe):

Accident Causes (consider unsafe acts and/or conditions contributing to accident, identify & list):

Corrective Action required (consider corrective action for people, premises, and machinery. Identify & list):

Placement of Responsibility for Correction and Follow-up:

- Immediate Action Taken. Describe.
- Items requiring further action. Describe.

Referred to for action_____ Target Completion Date _____

Supervisor's Signature: _____

Date:_____

1. PURPOSE

Ergonomics is the science that studies the interaction between humans and their work environment - and strives to design the environment to better fit the individual. COVENANT SERVICES is dedicated to reducing injuries and illnesses throughout our organization using sound ergonomic principles.

2. RESPONSIBILITIES

The following items summarize sections of our ergonomics program:

1. Supervisors and workers should become familiar with the causes of strain and sprain injuries and be knowledgeable of ergonomic stresses and implementing corrective measures.

2. On at least an annual basis injury trends should be reviewed to determine if areas exist where repetitive motion and/or cumulative trauma injuries are occurring. Identified areas should have an ergonomic assessment performed by a qualified individual (such as our insurance broker or carrier's Loss Control Consultants) or the location's Manager. The goal of the assessment is to develop action plans which would address the area, office, or department ergonomic issues.

3. Stretching and flexing activities should be encouraged of all workers at various times during the work shift. Job rotation or activity variation should also be considered for some work areas.

4. Office ergonomic suggestions are offered within this program which should be communicated to all applicable workers, supervisors, and information technology staff. The guidelines should be followed and workstation audits performed to ensure the comfort level of all affected workers.

5. Industrial ergonomic suggestions should be considered where appropriate and feasible including engineering and administrative control options. Engineering control options may include the use of adjustable workstations, anti-fatigue matting, pallet-pals, lift tables, or similar equipment. Administrative controls may include job rotation, activity variation, partner education sessions or similar activities/tasks.

ERGONOMIC PROGRAM OVERVIEW

Video display terminals (VDTs) are television-like screens and keyboards used with computers. Twenty years ago, VDTs were new and rare. Today, their use is widespread, due to a dramatic expansion of ways in which people use computers.

There are potential relationships between VDT working conditions and eye strain, fatigue and discomfort (ergonomic stresses); muscle and skeletal stress (physiological stresses); and mental stress (psychosocial stresses). These health effects, which can lead to cumulative trauma disorders (CTD's), can be reduced when work areas and tasks are designed and organized to make VDT users more comfortable and efficient.

3. ERGONOMIC STRESSORS

Ergonomic stressors include:

Repetitive activity
Holding a position without movement (Static Posture)
Use of force or strength
Localized pressure
Deviated positions

Repetitive Activity

Studies have shown that repetitious work is partnered with increased CTD's. How much repetition is too much? There is no clear answer; however, there are a few guidelines that can be used to estimate repetitive activity:

Wrist/hand - 1,500 to 2,000 manipulations/hour

Fingers - 1,000 to 2,000 manipulations/hour

Keystrokes - 15,000 to 18,000 keystrokes/hour

Shoulder - 90 to 150 movements/hour

Neck - 120 to 180 motions/hour

Cycle time < 30 seconds or fundamental cycle exceeds 50% of total task time

Holding a Position Without Movement

Discomfort and fatigue often arise from having to hold tensed muscles in a fixed or awkward position for long periods of time. When a muscle is tensed or in a static position, it does not allow blood and oxygen to transverse through it. During static effort, the internal pressure of the muscle tissue compresses the blood vessels, so that the blood no longer flows through the muscle. This causes fatigue to the muscle, thus increasing the probability of developing a CTD.

Excessive Use of Force or Strength

We don't think of the office as being a work place where heavy lifting or high forces are required, but there are certain issues we should be aware of to minimize low back and upper body discomfort.

1. Don't Pound the Keys!
   - ③ Several studies have found that typists who use more force than necessary to strike the keys have higher hand/arm problems than typists who use less force. Be conscious of how much force you use to strike the keys.
   - ③ When do we use more force than necessary? When we are under stress and feeling pressure. Take a moment to relax, and hopefully this will reduce the force you are using on the keys.
   - ③ When do we use more force than is necessary? When we are not skilled typists. Decide if you could benefit from some formal training in typing skills.
   - ③ The same force principle applies to the mouse. Grasp the mouse loosely when using it.

2. Static Fatigue
   - ③ Static fatigue refers to holding an object or a body part in one position for a long time. Static tasks quickly fatigue the muscles. Some office examples of static tasks include:
   - ③ Holding a pen while keying. Not only does this fatigue the muscles; it also makes keying more awkward.
   - ③ Grasping the mouse and not letting go. Release the mouse when not in use.
   - ③ Keeping the hands on the keyboard. Remove the hands from the keyboard when not keying.

3. Reducing Back Discomfort
   - ③ Stand during the day to help the back stay refreshed.
   - ③ Avoid lifting while seated. Stand to lift items, especially if bending or above-shoulder work is required.
   - ③ Don't stuff filing cabinets. The force required to remove materials increases dramatically if the cabinets are stuffed.
   - ③ Avoid situations where you have to bend for long periods. For example, if you need to look at files in a cabinet near floor level, remove the files and place them on your desk.
   - ③ If you need to handle boxes of printer paper or other heavy items, use a cart rather than carry the boxes.

Localized Pressure

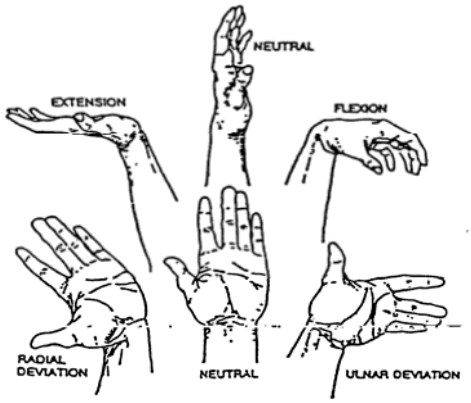
Too much pressure on muscles, blood vessels, nerves, and tendons can lead to inflammation and reduced blood flow. Over time, constant pressure can cause CTD's. Carpal tunnel syndrome is an example of CTD caused partly by localized, though internal, pressure.

In offices, workers put excessive pressure on the forearms and hands when they habitually rest them on angular surfaces like keyboard edges, work surface corners and hard chair armrests.

Awkward Positions

Examples of awkward positions include: Talking on the phone for long periods where people use their shoulder to prop the telephone against the ear, turning the head to the side to read copy while keying, and bending the head back to see the screen through bifocals.

Routinely putting parts of the body in deviated, overextended, or unbalanced positions can also lead to CTD's. This is because awkward positions press on nerves, stretch tendons, or push and pull tissues beyond their normal capacity. While keying on a computer the wrist can be placed in an ulna, radial, flexed, or extended position. A study at Purdue University determined that placing the wrist in an extended posture increased the probability of developing a CTD by 90% versus less than 10% when in a neutral position.

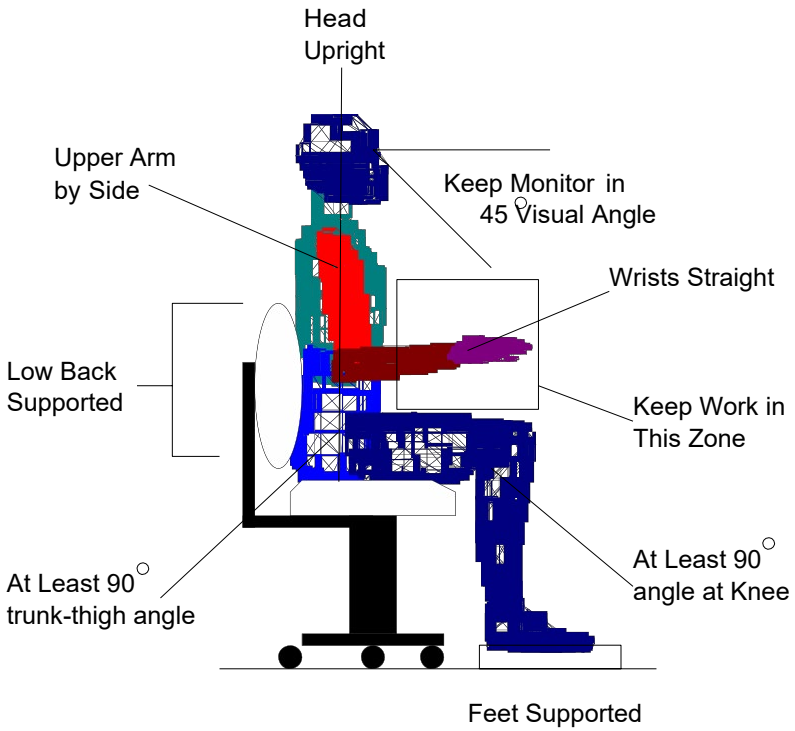


Deviated Postures of the Wrist

Maintaining a Neutral Posture

Each part of our body, from our legs to our eyes, has a **neutral posture**. The neutral posture of the body is the posture that is least tiring (least stressful) to maintain over time. For example, if you work with your arms too high, they become tired relatively quickly. If you do the exact same work with your arms resting comfortable at your sides, you can work longer without experiencing fatigue or discomfort.

The following figure shows the neutral posture when seated.



A **neutral posture** can be achievedby:

1. Moving During the Day.

GENERAL RULE: ANY POSTURE, IF MAINTAINED FOR A LONG ENOUGH TIME, BECOMES A FATIGUING POSTURE.

Consider the posture shown in Figure above only as a starting point when working at your computer. Change your posture routinely during the day to promote blood flow and reduce muscle fatigue.

Consider the following:

③ STAND during the day. This may be achieved by your break scheduling, or by distributing the tasks you do during the day.

③ Take your hands off the keyboard when you're not using the keyboard.

③ Consider different ways to input information. Alternate between your mouse and the PAGE DOWN key on the keyboard.

③ Make adjustments to your equipment. Many of us think that we adjust the workstation once to a "perfect" setting, and that's it. In reality, we are not getting the full benefit out of adjustable workstation components. Adjust the chair and the keyboard slope during the day to reduce fatigue.

③ Take stretching breaks during the day to promote blood flow and relax your muscles.

How often should you change your posture? The short answer is "as frequently as possible". Our bodies fatigue least when we provide it with short but frequent changes in posture. As a general guideline, try to change your posture at least every 30 minutes. Maintain the changed posture for at least 5 minutes.

2. Understand What Your Workstation Can Do.

Before trying to set yourself up in the neutral posture, take a few minutes to learn what adjustment features are available in your work area. Really Do This! Don't assume you already know what the features are.

4. STRETCHING & FLEXING

Why Stretch or Flex?

③ Exercise benefits the body in several ways. It increases blood flow and keeps muscles limber, which is exactly what sitting at the computer does not do! It also keeps you more relaxed and less fatigued across the work day.

③ The exercises presented on the next pages were designed based on observations of a variety of office tasks. If you perform the exercises on a regular basis, you will feel more refreshed at the end of the day.

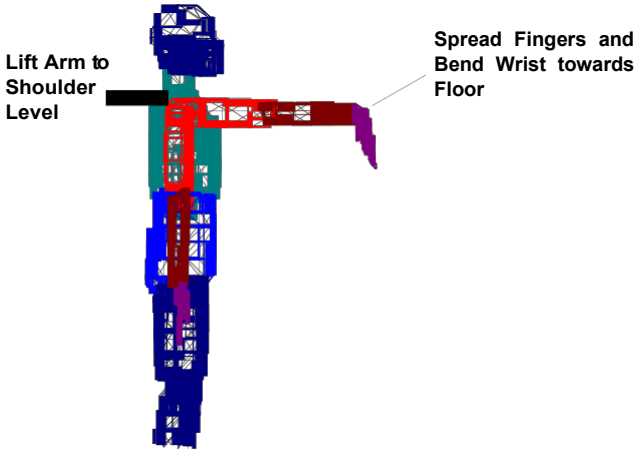
③ Note that exercises are provided for the upper body, back, legs, and the eyes. The eyes are no different than other body parts in terms of fatigue and the benefits of exercise.

NOTE. If you experience discomfort performing any of the exercises, discontinue immediately. Also, if you are under a physician's care for any of the body parts being exercises, consult with your physician before performing the exercise.

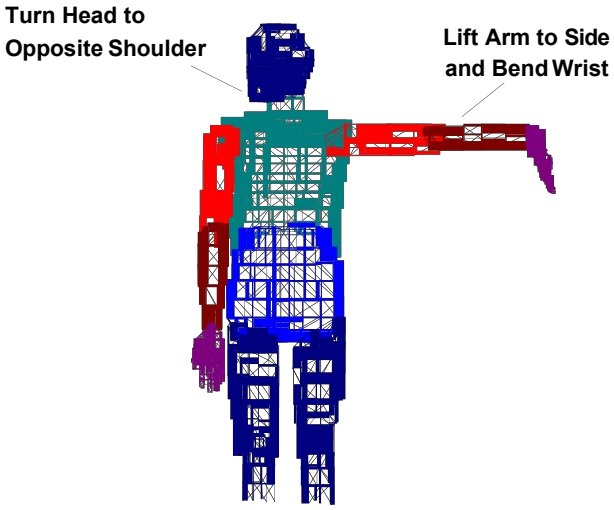
Exercises for the Upper Body

Try to do the complete set of exercises at the start and end of the work day. Try to do different portions of the exercises during micro breaks. For all exercises, move from one step to the next in a smooth, continuous flow, and hold each step for a count of ten.

Step 1. Stand up and let your arms relax by your sides.
Step 2. Extend your arms out at should level with the palms facing up. Spread the fingers and bend the wrists until the fingers point to the floor (see Figure 11).
Step 3. Bend the wrist towards you, so that the fingers are now pointed towards the ceiling.
Step 4. Relax the arms to your sides and gently shake them out.
Step 5. Raise the left arm to shoulder level and extend it out to your side, with the palm facing up. Then bend the wrist so that the fingers are pointed towards the floor. Then turn the head towards the opposite side of the body (see Figure 12).
Step 6. Repeat this stretch for the right arm.



Upper Extremity Stretch (Step 2)



Upper Extremity Stretch (Step 5)

Exercises for the Backs and Legs

Try to do the complete set of exercises at the start and end of the work day. Try to do different portions of the exercises during micro breaks. For all exercises, move from one step to the next in a smooth, continuous flow, and hold each step for a count of ten.

Step 1. Stand up and place your hands in the small of your back, then arch back. When you arch back, keep looking straight ahead (don't throw your head back when you arch your back).

Step 2. Place your hands on your hips, and lean sideways for a count of ten, then to the left for a count of ten.

Step 3. Place your feet shoulder width apart and step forward with your right foot. Bring both feet flat to the floor (heel of rear foot should not be off the floor). Slowly bend the right knee, keeping the heel of the left foot on the floor.

Step 4. Switch forward foot and repeat.

Eye Exercises

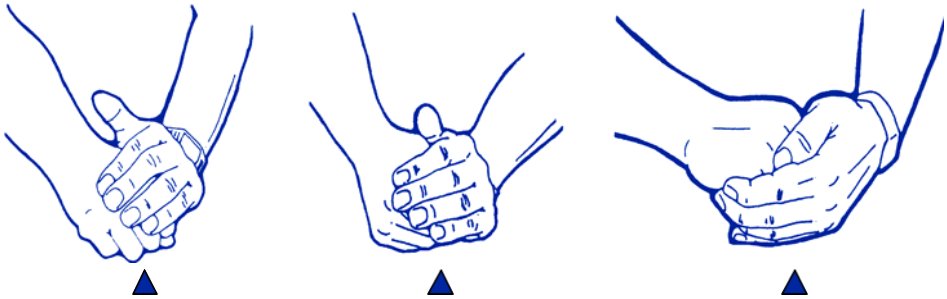
Try to do portions of the eye exercises as part of micro breaks during the day.

Step 1. Sit and look at the monitor, then look away at an object at least 50 feet away from your screen. Look at the distant object for a count of 10, then look back at your screen for a count of 10. Repeat 3 times.

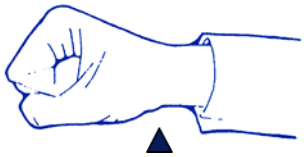
Step 2. Take a pencil and hold it at arm's length. Focus on the pencil with your eyes. Then slowly move the pencil in towards the eyes until the pencil gets blurry. Close your eyes at this point and move the pencil back to arm's length. Open your eyes and repeat 3 times.

Hand Exercises

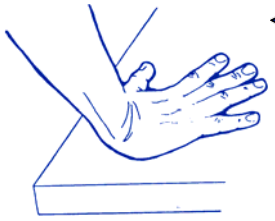
Try to do portions of the hand exercises as part of micro breaks during the day.



For five seconds at a time, make a loose fist and gently press down with the unclenched hand, keeping the wrist straight. Repeat these three positions with the unclenched hand pressing on the clenched hand.



Tightly clench hand and release extending the fingers five times.



Gently press hand against table, stretching fingers and wrist for five seconds.

Rest forearm on edge of table, grasp fingers of one hand and gently bend back wrist for five seconds.

5. ERGONOMIC ADJUSTMENT OF YOUR WORKSTATION, STEP-BY-STEP INSTRUCTIONS

Introduction

The next sections present step-by-step instructions for adjusting your workstation to make it more user-friendly.

Section I assumes easy adjustability of both the chair and keyboard support surface.
Section II assumes that only the chair has adjustability. Select the appropriate section based on this.

1. If Seat and Keyboard Surface are Adjustable:

Step 1. **Find the adjustment controls on your chair and keyboard tray**. For your chair, this may be a lever on the chair, or it may be a screw-height adjustment. The tray adjustment controls are usually located underneath the tray.

Step 2. **Adjust the height of your chair** until:
- ③ Your feet are resting flat on the floor, and
- ③ Your trunk/Thigh angle is at least 90°.
- ③ *NOTE:* If your chair can not be lowered far enough so that your feet rest flat on the floor, a foot rest may be necessary.

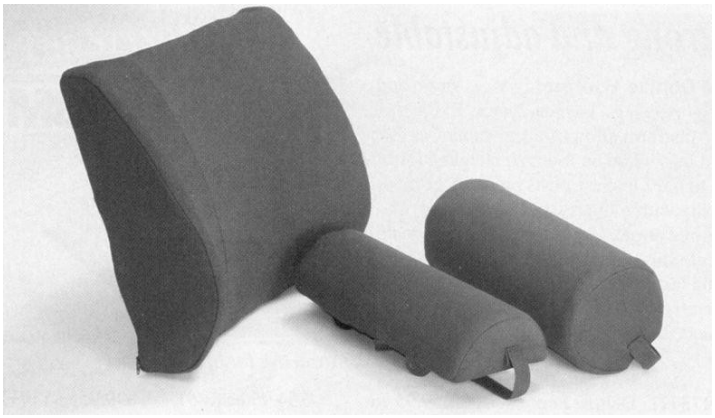
Footrest

Step 3. **Adjust the keyboard height** (and arm rests if your chair has this feature) until your wrists are straight when positioned on the keyboard and mouse.

- ③ Elbows should be around 90°, and your upper arms should be hanging comfortably at your sides.
- ③ Your arms should not be extended (as a reference, your elbows should not be in front of your body).
- ③ If your chair has adjustable arm rests, adjust the height and horizontal distance between the arm rests so that they help support your arms.

Step 4. Are you getting **good back support?**

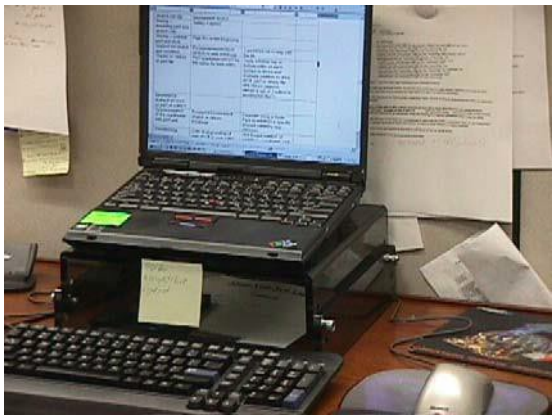
- ③ The back rest of the chair should provide firm support in your lower back. To find this area, place your thumbs on your hips and place your fingers on your back. This inward-curved portion of the back is the low back.
- ③ Adjust the back rest of the chair up/down or in/out so that the outward-curved portion of the back rest follows the inward-curved portion of the back.
- ③ NOTE. If the back rest does not support the lower back, a lumbar pad may be necessary. A lumbar pad can be a commercially-available product, or it can consist of something as simple as a rolled-up towel.



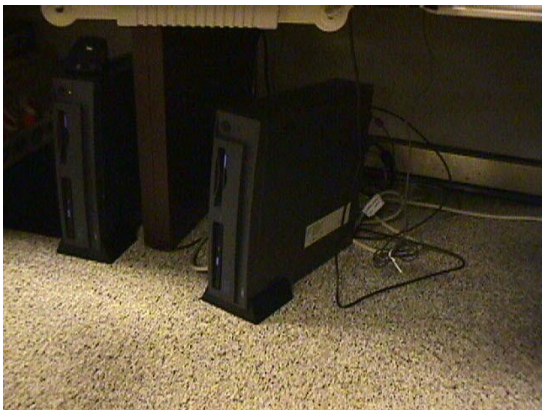
Examples of Lumbar Pads

Step 5. **Position your keyboard, monitor, and source documents**.

- ③ The monitor height should not require you to have to look up at the monitor
- ③ Using a laptop? Use the adjustable-height stand to raise the laptop screen (See Figure 4).
- ③ Using a full-size PC? Do not put the CPU underneath the monitor. Put it to the side or in the leg well (see below).

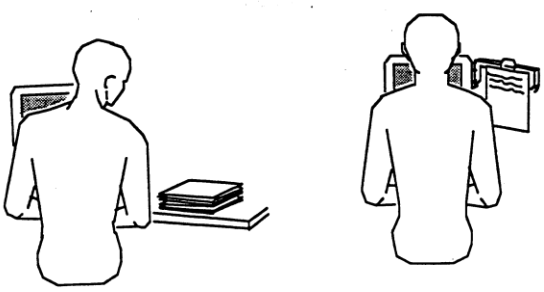


Laptop on Adjustable Stand



CPU placed on floor

③ If you wear bi-focal's, it becomes more important to keep the monitor as low as possible in your visual field of view.
③ Move the monitor as far back as possible to minimize eye fatigue. Make sure you do not have to lean forward to see what's on the screen. Check to see if your software will allow you to increase character size on the screen to allow the monitor to be moved farther back.
③ Place the keyboard directly in front of the monitor so you do not have to twist your neck to view the monitor.
③ Place your source documents directly next to the monitor so you do not have to twist your neck.
③ Do not place source documents flat on your work table. This causes neck flexion. Use a document holder to keep documents at the same angle as your monitor.



Document Holder Illustrations

2. If Seat is Adjustable (Fixed Work Surface Height):

Step 1. **Find the adjustment controls** on your chair. This may be a lever on the chair, or it may be a screw-height adjustment.

Step 2. **Adjust the height of your chair** (and arm rests if your chair has that feature) until your wrists are straight on the keyboard and mouse.

③ Elbows should be around 90°, and your upper arms should be hanging comfortably at your sides.
③ Your arms should not be extended (as a reference, your elbows should not be in front of your body).
③ If your chair has adjustable arm rests, adjust the height and horizontal distance between the arm rests so that they help support your arms.

Step 3. Look at your **chair position**:

③ Your feet should be resting comfortably on the floor (legs should not be dangling, and legs should not feel cramped).
③ The angle between your trunk and thighs should be at least 90°.
③ NOTE. If your feet are not resting flat on the floor, you may need a foot rest.
③ NOTE. If the angle between your trunk and thighs is less than 90°, or your legs don't clear underneath the table, your work surface may need to be raised. Contact your supervisor if this is the case.

Step 4. Are you getting good **back support?**

③ The back rest of the chair should provide firm support in your lower back. To find this area, place your thumbs on your hips and place your fingers on your back. This inward-curved portion of the back is the low back.
③ Adjust the back rest of the chair up/down or in/out so that the outward-curved portion of the back rest follows the inward-curved portion of the back.
③ NOTE. If the back rest does not support the lower back, a lumbar pad may be necessary. A lumbar pad can be a commercially-available product, or it can consist of something as simple as a rolled-up towel.

Step 5. **Position your keyboard, monitor, and source documents.**

③ The monitor height should not require you to have to look up at the monitor (helpful hint: If the CPU is underneath the monitor, remove the CPU to lower the monitor).
③ If you wear bi-focal's, it becomes more important to keep the monitor as low as possible in your visual field of view.
③ Move the monitor as far back as possible to minimize eye fatigue. Make sure you do not have to lean forward to see what's on the screen. Check to see if your software will allow you to increase character size on the screen to allow the monitor to be moved farther back.

- ③ Place the keyboard directly in front of the monitor so you do not have to twist your neck to view the monitor.
- ③ Place your source documents directly next to the monitor so you do not have to twist your neck.
- ③ Do not place source documents flat on your work table. This causes neck flexion. Use a document holder to keep documents at the same angle as your monitor.

6. ADJUSTING YOUR WORKSTATION: GENERAL PRINCIPLES

1. Arms Should be Supported at the Keyboard, But Not on Sharp or Hard Edges

The wrist area is very sensitive and should not be rested on the edge of the work surface when typing or mousing. Consider using a wrist rest and/or the arm rests of the chair to provide support for the arms. See Figure 7 for an example of a wrist rest.

The term "wrist rest" is misleading because it is actually the base of the palms of the hands that should rest on the wrist rest, not the wrist itself. See Figure 7.

Remove your hands from the keyboard when not typing, in order to facilitate blood flow and reduce pressure at the wrist.

Avoid tight clothing or jewelry at the wrists - a tight watch band is like resting the wrist on a sharp edge.

This principle also applies to mouse and calculator tasks you perform during the day.

Figure 7. Wrist Rest for Keyboard

2. Avoid Extended Reaches to the Mouse

General Rule: The mouse or trackball should be placed immediately next to the keyboard to avoid extended reaches.

Many work surfaces were not designed to accommodate both a keyboard and a mouse. You should have at least a 27" facing edge to the work surface in order to place the mouse next to the keyboard.

If you do not have this 27" distance, consider the following options:

③ Install a keyboard tray with the required length (see Figure 1), or
③ Install an extension on the existing work surface to increase its length (see Figure 2).

NOTE. The table extension shown in Figure 2(B) also allows you to make better use of your work space.

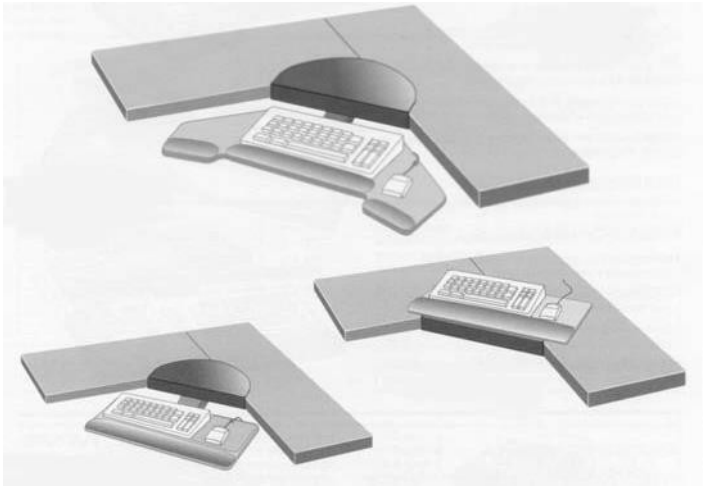
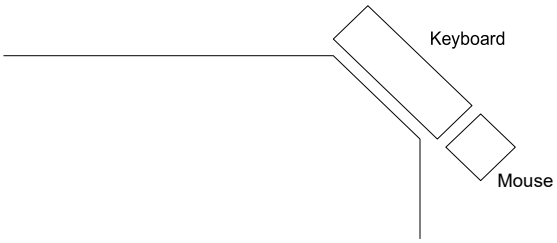


Figure 1. Examples of Keyboard Trays / Support Devices to Accommodate Corner Workstation Arrangements

A. Table Not Long Enough- Extended Reach to Mouse Required



B. Extension on Table Places Keyboard and Mouse In-Line

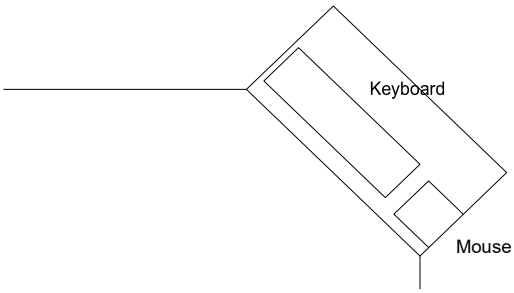


Figure 2. Extension (Overlay) on Table to Reduce Reach Distances to Mouse and Make Better Use of Corner Workstation Space

3. Using the Telephone

If you use the phone routinely, consider a telephone headset. The headset can reduce stressful neck postures and allows you to be more mobile when on the phone.

4. Visual Issues in the Office

⇒ Monitor Location

③ Position the monitor so you are not looking above the horizontal line of sight.
③ Position the monitor so you are not looking lower than 45 degrees below your horizontal line of sight. To check this, if the monitor is 18 inches away from your eyes, measured in a horizontal line to the monitor, the lowest viewed point on the monitor should not be lower than 18 inches below eye level.
③ Position the monitor as far back as possible to minimize eye fatigue. Viewing distances of 30 inches or more have been found to be comfortable, depending on character size. Check to see if your software will allow you to increase character size so the monitor can be moved farther back.

③ How to do these things?

Laptop. Typically, too low if the laptop adjustable height stand is not placed underneath the unit (see Figure 4).

Full Size Monitor. Typically, too high if the CPU is placed underneath the monitor. Place the CPU to the side or in the leg well (see Figure 5).

Increasing Viewing Distance.

③ Place monitor on the deepest work surface you have available.

③ Consider a keyboard tray as a means to increase viewing distance to the monitor.
③ Consider a flat panel display.

⇒ Monitor Characteristics

③ Images on the screen should not have any perceptible flicker or waver. Contact your supervisor if you notice flicker on your screen.
③ Character sizes should be large enough to be seen given your required viewing distance. Sometimes your software will allow you to adjust the character size to accommodate viewing distance to the monitor.
③ The monitor should have controls for brightness and contrast. Take advantage of these. Adjust screen brightness/contrast during the day, and on different days (for example, sunny versus cloudy days).
③ While screen colors are, nice and can be very useful, most recent evidence suggests that a screen with a lot of colors is more visually fatiguing than a screen with a few or no colors. Your software can often let you determine the colors to be displayed on your screen.

⇒ Reducing Glare on the Screen

③ What is glare?

Glare is any reflection on the screen that makes viewing more difficult. Glare on monitors is the number one complaint of computer users.

③ How can we reduce glare?

Often glare is caused by too much light in your work area. If an overhead light is causing glare, see if the light can be turned off or dimmed. If the source of glare is light from a window, draw the blinds to eliminate glare at the source.
NOTE. Make certain that the reduced light will not affect your ability to see things besides the computer screen. Task lighting may be required to still see source documents if you reduce the overall illumination level.

③ Reposition the monitor to move it away from the source of glare. Take advantage of the tilt and swivel options on the computer.

NOTE. Recent studies have indicated that tilting the screen down in an effort to reduce glare can result in neck flexion. Avoid this as a strategy to reduce glare.

③ Sometimes the glare is not coming from the computer screen. Avoid highly reflective surfaces around the monitor.

③ Adjust the brightness and polarity of the screen to reduce glare. Reverse polarity displays (dark characters on light background - like this page) are more resistant to glare than standard polarity displays (light characters on a dark background).

③ Use an anti-glare filter if necessary. They are very good at eliminating glare, but remember that they should only be used if glare is present.

⇒ Some Final Vision Issues

③ Clean the screen regularly. If you wear glasses, clean them regularly.
③ Are your glasses right for computer work? Tell your optometrist that you work on a computer and he/she can adjust the focal length of your glasses accordingly.
③ When was the last time you had, your eyes examined? It is estimated that 30% of the population either needs glasses or needs a new prescription. If experiencing visual difficulties, you may need an eye exam.
③ Remember to blink! Blinking rates decrease when using the computer. Blinking is how the eyes lubricate themselves. Make a conscious effort to blink when using the computer.

7. INDUSTRIAL ERGONOMIC CONSIDERATIONS

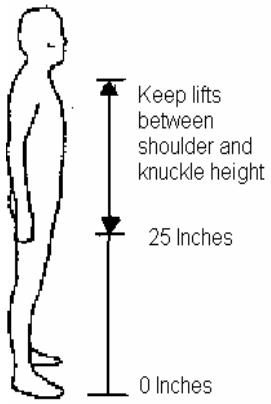
Industrial ergonomic interventions should also be considered within production, warehousing, and other work environments. The goal of ergonomic interventions is to reduce cumulative trauma stress on the worker by modifying the work place or area to fit the worker. Intervention solutions may include engineering changes (such as workstation design or modifications - anti-fatigue matting, pallet-pals, lift tables), administration controls (such as job rotation or work breaks), and/or work practices (such as partner education).

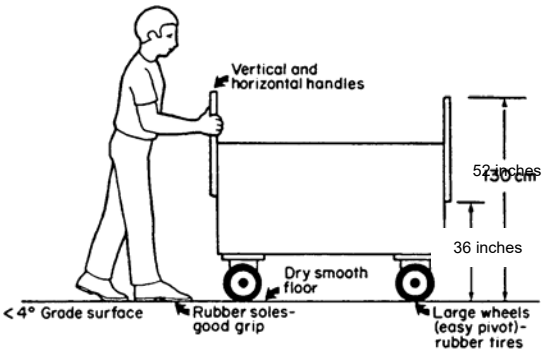
On at least an annual basis injury trends should be reviewed to determine if areas exist within our facilities where repetitive motion and/or cumulative trauma injuries are occurring. Identified areas should have an ergonomic assessment performed by a qualified individual (such as our insurance carrier's Ergonomic Specialist) or trained members of the safety committee/staff. The goal of the assessment is to develop action plans which should address the area/department ergonomic issues.

GENERAL MATERIAL HANDLING GUIDELINES

The following items are general material handling suggestions:

③ Use lift trucks, fork lifts, pallet jacks, two or four wheel dollies or other mechanical equipment whenever possible to move materials/products vs. carrying materials/products.
③ Do not overload the tops of carts or dollies. Make more than one trip if necessary.
③ When purchasing carts or dollies, use a minimum of a 6-inch wheel. The larger the wheel, the less force required to initiate and maintain its movement, and less stress on the body.
③ Use two people when heavy loads should be lifted or lowered. Greater than 40 pounds is a generally suggested weight that should require a two-person lift.
③ Push - Don't Pull. There is more strain on the back when pulling in a twisted position.
③ Move your feet when turning; do not twist your torso/back.
③ Keep materials close to the body when lifting or lowering.
③ When taking a load off the shelf, slide it close to the body then down to waist level. Use the straight arm carry vs. extending the arms and lifting off the shelf.
③ Use a straight arm carry vs. holding arms at a 90-degree angle.



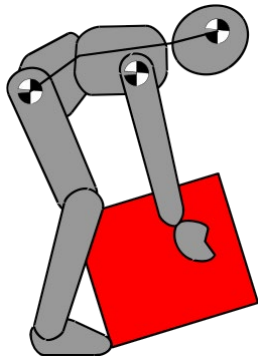


Important specifications in a cart.

HAZARD PREVENTION AND CONTROL FOR INDUSTRIAL ERGONOMICS

Ergonomic hazards are prevented primarily by effective design of a job or job site. An employer's program should establish procedures to correct or control ergonomic hazards using appropriate engineering, work practice, and administrative controls, coordinated and supervised by an ergonomist or similarly qualified person. Administrative controls reduce a partner's exposure to tasks with ergonomic hazards by schemes such as rotation to less stressful jobs, reduced production demand or quotas, and increased rest breaks.

Engineering controls, where feasible, are the preferred method of control. The primary focus of an ergonomic program is to make the job fit the person, not force the person to fit the demands of the job. This can be accomplished by redesigning the workstations, work methods, work tools, and work requirements to reduce or eliminate excessive exertion, repetitive motion, awkward postures, and other risk factors.



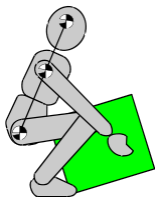
1. Engineering Controls

Principles of Work Methods

Work methods (including workstations and tools) should be designed to reduce exposure to static, extreme, and awkward postures; repetitive motions; excessive forces; inefficient grasps; and vibrations. To accomplish this, the methodology which follows should be helpful. Employers should bear in mind that this is one possible methodology; there are many valid ways to approach ergonomic problems. This method is not difficult and does not require extensive training. Rather, it requires some knowledge of, and sensitivity to, the stresses or risk factors that cause problems.

The first step is to identify the present problems. To do this, select the jobs with high incidence rates (a "worst first" approach); observe those jobs; interview and survey the workers who perform the job, as well as supervisors about the problems and their suggested solutions; videotape those jobs; and conduct task analyses. Suggested steps in a task analysis are:

- ③ From the videotape describe the job in a step-by-step manner. This can be in simple language and need not be overly technical.
- ③ Identify the risk factors - those parts of the job that are partnered with ergonomic problems.
- ③ Propose alternatives which should eliminate or reduce the risk factors.
- ③ Interview workers doing the job, and supervisors about the possible solutions.
- ③ Test and evaluate alternatives where possible.
- ③ Select the most appropriate alternatives.
- ③ Implement chosen alternatives.
- ③ Monitor the effects of the changes.
- ③ Document the changes in the incidence rates.



Principles of Workstation Design

Workstations should be designed to accommodate the vast majority of the persons who work on a given job. Because workers vary considerably, it is not adequate to design for limbs, work piece orientation, work piece holding, and layout. These characteristics of workstations are interdependent. A change in one often affects others.

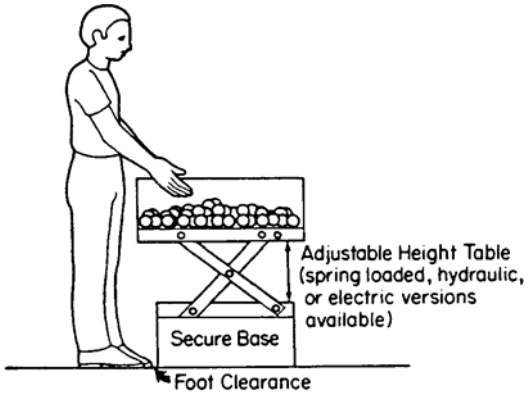
Static loading of muscles causes rapid fatiguing. Workstations can contribute to static loading by causing the work to be done in awkward postures or requiring that items be constantly held by the worker. A prime example is where a worker has to hold a tool constantly, even when it is not being used.

Work activity height is especially important to control postural risk. Workers who must stoop and reach are not comfortable and are more likely to become injured. A general guideline or "rule of thumb" for working height has been 2 inches below the elbow for many tasks, with lower heights recommended for working requiring high precision. These "rules of thumb" are, however, a starting point and the working height should be evaluated for the specific task. Note that this is working height and not necessarily work surface height.

Work height can be adjusted in three ways.

1. The first and preferred way is to provide an adjustable work surface.

2. The second is to provide a lower work surface and place the work piece in a fixture that raises it to the proper height for that worker.



Adjustable height table for container of parts.

3. The last and least desirable way to adjust the working height is to provide a relatively high work surface and provide adjustable platforms or platforms of various sizes for the worker to stand on. This last way is usually the least expensive and most often adopted. It does, however, create a new tripping hazard.

The reach at which task components are performed affects the strength, precision capability, stress, and other biomechanical aspects of the worker. Therefore, maximum reach distance should be kept within the normal reaching distance-somewhere between 14 and 18 inches. The distance depends on the difficulty of the task, the forces exerted, and the frequency of the activity. Reaches above the shoulder, behind the worker, and far in front or to the side of the worker should be avoided. To accommodate this, the work piece should be located close to the worker as should any tools, parts, and other items. This can be accomplished by providing workstations and delivery bins which can accommodate the height and reach limitations of workers of various sizes.

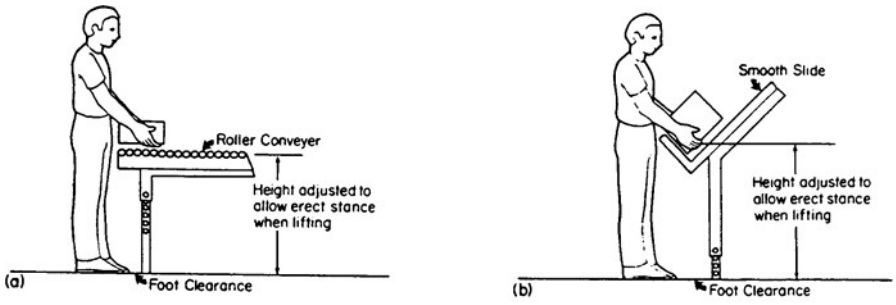
Force requirements should be reduced or minimized when possible. The worker should not be exerting high forces. Work can be performed more efficiently and more safely by providing a mechanical advantage. If workers are required to exert high forces, the work piece should be located and stabilized such that the forces are optimal and minimized. Force can sometimes be reduced by using fixtures and proper workstation height.

Hard or sharp edges can be a hazard in a workstation. When the worker's arm or hand repeatedly comes in contact with a hard or sharp edge, damage to the tissues, including nerve or blood vessel damage can result. Control measures include rounding edges, padding edges, or relocating equipment so people won't hit the edges. Contact with thermally conducting work surfaces can be responsible for loss of heat in the hands and arms. This can cause discomfort and, if the wrist and fingers become cold, the tendons and joints become stiff. This may cause symptoms of CTD's to develop.

Proper seating should be made available to workers where the job permits. This is possible in many jobs where tradition has dictated that standing is the only way to do the job. Sometimes a new look at the job, workstation, and tools will be necessary to identify ways to allow for seated or sit/stand work,

but it will result in significantly less fatigue. It is important to provide support for the limbs - both arms and legs. Often, when the arms are provided a comfortable place to rest, the worker will become less fatigued and will be better able to perform accurately and consistently throughout the day. Foot rests for seated workers and rails to allow a variety of standing postures will reduce the stress on the worker.

Work piece orientation can cause numerous problems, including higher than necessary repetitions, higher than necessary forces, static postures, and awkward postures. Care should be taken to ensure that the work piece is in such a position that the required tasks do not expose the workers to unnecessary hazards. Proper workstation height and proper fixtures and orientation devices can reduce or eliminate this problem.



Improvements of workplace design a) roller conveyers, b) gravity fed slide.

Work piece holding is a simple solution to ergonomic hazards which is often overlooked. Fixtures that hold the work piece and orient it for ease of work can greatly reduce the stress of the job and often increase productivity. The worker should not have to hold the work piece-mechanical devices do this much better. This is accomplished by providing adjustable fixtures and rotating tables which can reduce stress on the worker because the position of the work piece can be firmly held and easily manipulated.

Layout of a workstation has an impact on all of the preceding points of workstation design. A good layout will facilitate the flow of materials and product through the station. It will also make designing for less stressful work easier.

2. Administrative Controls – Job Rotation

We often think that an injury occurs because of an event in time. Sometimes this is the case (for example, if you slip and fall and hurt yourself). But in the case of most musculoskeletal injuries, the injury does not occur because of an isolated event but because of an accumulation of stress and strain on the body. Performing the same job over and over again maximizes this accumulation of stress and strain on the body.

Because different job functions performed at H-E-B stress the body differently, we support the concept of job rotation or team rotation as an administrative control option. This option should be used following implementation of any and all reasonable engineering control options.

Job Rotation is beneficial because:

a) Injuries occur because of an accumulation of stresses on the body,

b) Different job duties and activities stress the body differently,

Job rotation strategies should be developed for each facility where cumulative trauma injuries are present and where this is determined to be a viable option.

When considering job rotation, remember the following:

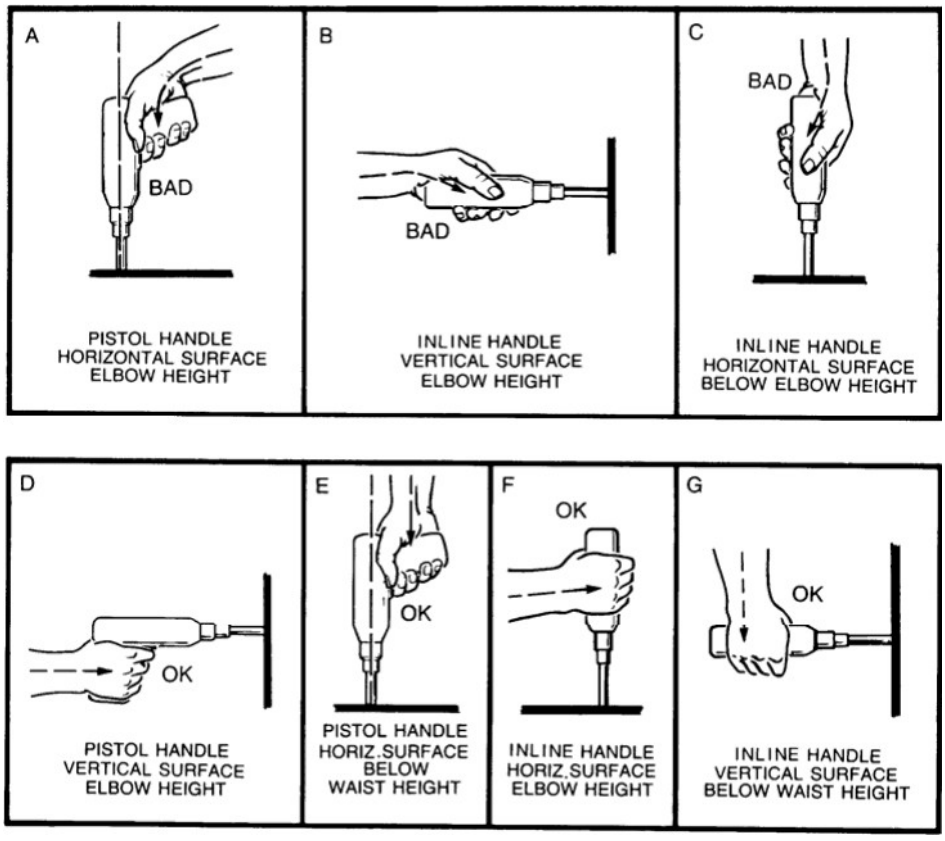
a) Rotate between jobs that place different physical stresses on the body. Do not rotate to a job where the physical stress or muscles affected are identical, select jobs where physical stress is alternated between areas of the body or muscle groups.

b) Rotate as frequently as possible. As a general rule, rotate during the day as opposed to rotating across days.

3. Tool and Handle Design

Tools and handles increase worker productivity by extending and amplifying abilities. Proper attention should be paid to the selection and design of tools and workstation layouts to minimize the risks of CTD's. For any tool, a variety of sizes should be available for a variety of workers. The appropriate tool should be used to do a job. Tools and handles should be selected to eliminate or minimize the following risk factors:

③ High contact forces and static loading.
③ Extreme or awkward joint positions.
③ Repetitive finger action.
③ Tool vibration.
③ Excessive grip strength requirements.



Careful selection of hand tools is essential if the incidence of CTD's partner d with the use of the tools is to be reduced. Selection of tools based on the lowest bidder or even brand name reputation may be costly in the long run, if the tools do not meet ergonomic considerations. To select the best tools the purchaser should be familiar with the jobs to be done and the problems involved. A familiarity with the concerns and principles presented in these recommendations will help in making a wise selection.

Before buying, a user should physically evaluate the tool. A trial period with various models and brands of tools is suggested before buying, if possible. At the very least, the purchasers should hold the tool being considered in likely positions of use and think about potential problems with its use. During tool use, the hand positions should be noted, indicating whether the partner's wrist is bent or straight, and also noting the force or effort required. Handle sizes and their adequacy for gloved hands, should be considered. Tools should be selected to accommodate a right or left handed worker, if possible. Balance, the center of gravity, and the weight of the tool should be evaluated as well as the presence and adequacy of guards, automatic brakes and other safety devices. All of this can be done quickly, and the checklist at the end of these recommendations can be used to ensure adequate evaluation and comparison.

Improper use of and/or poor design of handheld tools can cause damage to the hand and arm, which may involve considerable pain and possible disability. The specific conditions that contribute to these ergonomic problems are: (1) awkward hand postures or movements that are

repeated many times a day, (2) excessive pressure on the hands and wrists, (3) exertion of force with the hand and wrist in awkward positions, and (4) vibrating tools.

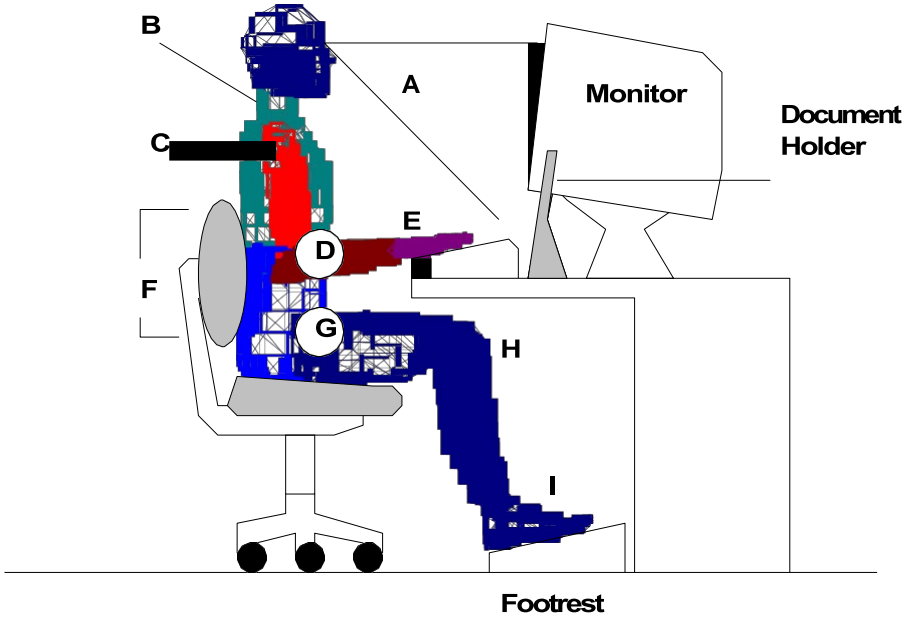
In summary, many characteristics affect the functioning of handheld tools. The handles and their positioning are critical in determining the accidents that may happen and the CTD's that may develop using a tool. The tool's weight, shape, and size affect how it is used and how much force is required. Finally, tool guarding, vibration characteristics, and the temperatures generated by the tool are important factors that affect the safe, healthy operation of the tool.

Appendix A

8. COMPUTER WORKSTATION SELF-ASSESSMENT TOOL

INTRODUCTION: This checklist is designed to allow you to assess your computer workstation set-up in order to minimize fatigue and discomfort, as well as enhance your productivity across the work day. Fill out the questions below, using the figure on the next page as a reference. If you do not meet the guideline, try the tips offered in the checklist. **If you still do not meet the guideline, contact your supervisor.**

NAME_____
DEPT/AREA_____
PHONE_____DATE _____



BODY PART	GUIDELINE	IF YOU DO NOT MEET THE GUIDELINE, TRY THE FOLLOWING:	GUIDELINE MET YES / NO?
A. EYES	Monitor and source documents should be in 0-45-degree zone	1. Raise or lower monitor as needed. 2. Use a document holder	
B. NECK	1. Neck should be vertical 2. Neck should not be rotated	1. Raise or lower monitor as needed. 2. Use a document holder 3. Place monitor and documents directly in front of you (in-line workstation design) 4. Bring monitor/documents closer if you find yourself leaning forward	

		to view.	
BODY PART	**GUIDELINE**	**IF YOU DO NOT MEET THE GUIDELINE, TRY THE FOLLOWING:**	**DO I MEET THE GUIDELINE (YES / NO)?**
C. UPPER ARMS	Upper arms should be hanging vertically at sides (no extended reaches)	1. Bring keyboard/mouse closer to body. 2. Don't put documents in front of keyboard. 3. Place mouse next to keyboard. 4. Make sure you have adequate leg room to get legs under work table.	
D. ELBOW	Elbow angle should be between 70-135 degrees	1. Raise or lower chair as necessary. 2. Raise or lower keyboard as necessary.	
E. WRISTS	1. Keep the wrists straight 2. Avoid contact with sharp edges	1. Raise or lower chair as necessary. 2. Raise or lower keyboard as necessary. 3. Change angle of keyboard to straighten wrists. 4. Use a wrist rest to avoid contact stress.	
F. BACK	1. Low back area should be supported 2. Back should maintain Lazy S curve.	1. If back rest is adjustable, move back rest vertically or horizontally to achieve low back support. 2. Consider use of a lumbar pad.	
G. TRUNK -THIGH ANGLE	Trunk-thigh angle should be at least 90 degrees.	1. Raise chair to increase trunk-thigh angle (note issue I below) 2. Raise work surface if more leg room is needed. 3. Move monitor/documents closer if you find yourself leaning forward to view	
H. KNEE ANGLE	Knee angle should be at least 90 degrees.	Increase horizontal leg clearance by 1) eliminating any "clutter" in leg well, or 2) installing keyboard tray to functionally increase leg room.	
I. FEET	Feet should be firmly supported on surface	1. Adjust chair height 2. Consider foot rest	

SELF-ASSESSMENT CHECKLIST - PART 2

MONITOR FEATURE	GUIDELINE	IF YOU DO NOT MEET THE GUIDELINE, TRY THE FOLLOWING:	DO I MEET THE GUIDELINE (YES / NO)?
A. GLARE	Glare should not be visible/- detrimental to user	1. Identify source of glare and eliminate it (turn off light, close window blind, etc.). 2. Reposition monitor (tilt, swivel, or move) to eliminate glare. 3. Try changing screen polarity (dark characters on light background more resistant to glare effects). 4. Clean screen regularly. 5. Use a glare filter.	
B. FLICKER	Flicker should not be noticeable	*Contact your supervisor*	
C. CHARACTER SIZE	Characters should be large enough for easy viewing (no visual strain to see)	1. Move monitor closer 2. See if software allows you to increase character size.	
D. SCREEN RESOLUTION	Screen image should be crisp and easy to see (no visual strain)	1. Adjust brightness and contrast. 2. Clean screen regularly. 3. See if software allows you to increase character size. 4. Minimize number of colors used on screen, select color combinations with inherent high contrast.	

SELF-ASSESSMENT CHECKLIST - PART 3

TASKS	GUIDELINE	IF YOU DO NOT MEET THE GUIDELINE, TRY THE FOLLOWING:	DO I MEET THE GUIDELINE (YES / NO)?
A. TIME ON COMPUTER	Avoid more than 1 hour continuous use of computer	1. Take a break at least every hour 2. Stand up and stretch during breaks. 3. Vary tasks to mix computer work with non-computer work.	
B. VISUAL FATIGUE	Avoid more than 1 hour continuous use	1. Take a break at least every hour 2. Perform eye exercises during	

	of computer	breaks. 3. Vary tasks to mix computer work with non-computer work.	

Appendix B

Ergonomic Hazard Identification Checklist

Work Area_____Date _____
Conducted By _____
Reviewed by_____Date _____

Answer the following questions based on the primary job activities of workers in this facility.

Use the following responses to describe how frequently workers are exposed to the job conditions described below:

Never - worker is never exposed to the condition

Sometimes - worker is exposed to the condition less than 3 times daily

Usually - worker is exposed to the condition 3 times or more daily

TERMS
Primary job activities: Job activities that make up a significant part of the work or are required for safety or contingency. Activities are not considered to be primary job activities if they make up a small percentage of the job (i.e., take up less than 10% of the worker's time), are not essential for safety or contingency, and can be readily accomplished in other ways (e.g., using equipment already available in the facility).

Externally paced activities: Work activities for which the worker does not have direct control of the rate of work. Externally paced work activities include activities for which (1) the worker must keep up with an assembly line or an independently-operating machine, (2) the worker must respond to a continuous queue (e.g., customers standing in line, phone calls at a switchboard), or (3) time standards are imposed on workers.

Task:	**Never**	**Sometimes**	**Usually**	**If USUALLY, list jobs to which answer applies here**
1. Do workers perform tasks that are externally paced?				
2. Are workers required to exert force with their hands (e.g., gripping, pulling, pinching)?				
3. Do workers use hand tools or handle parts or objects?				

4. Do workers stand continuously for periods of more than 30 min?				
5. Do workers sit for periods of more than 30 min without the opportunity to stand or move around freely?				
6. Do workers use electronic input devices (e.g., keyboards, mice, joysticks, track balls) for continuous periods of more than 30 min?				
7. Do workers kneel (one or both knees)?				
8. Do workers perform activities with hands raised above shoulder height?				
9. Do workers perform activities while bending or twisting at the waist?				
10. Are workers exposed to vibration?				
11. Do workers lift or lower objects between floor and waist height or above shoulder height?				
12. Do workers lift or lower objects more than once per min for continuous periods of more than 15 min?				
13. Do workers lift, lower, or carry large objects or objects that cannot be held close to the body?				
14. Do workers lift, lower, or carry objects weighing more than 50 lb.?				

Appendix C

Material Handling Checklist

Work Area_____Date _____
Conducted By _____
Reviewed by_____Date _____

"No" responses indicate potential problem areas which should receive further investigation.

	YES	NO
1. Are the weights of loads to be lifted judged acceptable by the workforce?		
2. Are materials manually moved over short or minimum distances?		
3. Is the distance between the object load and the body minimized?		
4. Are walking surfaces		
level?		
wide enough?		
clean and dry?		
5. Are objects		
easy to grasp?		
stable?		
able to be held without slipping?		
6. Are there handholds on these objects?		
7. When required, do gloves fit properly?		
8. Is the proper footwear worn?		
9. Is there enough room to maneuver?		
10. Are mechanical aids used whenever possible?		
11. Are working surfaces adjustable to the best handling heights?		
12. Does material handling avoid		
movements below knuckle height and above shoulder height?		

static muscle loading?		
sudden movements during handling?		
twisting at the waist?		
extended reaching?		
13. Is help available for heavy or awkward lifts?		
14. Are high rates of repetition avoided by		
job rotation?		
self-pacing?		
sufficient pauses?		
15. Are pushing or pulling forces reduced or eliminated?		
16. Does the partner have an unobstructed view of handling the task?		
17. Is there a preventive maintenance program for equipment?		
18. Are partners trained in correct handling and lifting procedures?		

Appendix D

Task Analysis Checklist

Work Area_____Date _____
Conducted By _____
Reviewed by_____Date _____

"No" responses indicate potential problem areas which should receive further investigation.

1. Does the design of the primary task reduce or eliminate	YES	NO
bending or twisting of the back or trunk?		
crouching?		
bending or twisting the wrist?		
extending the arms?		
raised elbows?		
static muscle loading?		
clothes wringing motions?		
finger pinch grip?		
2. Are mechanical devices used when necessary?		
3. Can the task be done with either hand?		
4. Can the task be done with two hands?		
5. Are pushing or pulling forces kept minimal?		
6. Are required forces judged acceptable by the partners?		
7. Are the materials		
able to be held without slipping?		
easy to grasp?		
free from sharp edges and corners?		
8. Do containers have good handholds?		

9. Are jigs, fixtures, and vises used where needed?		
10. As needed, do gloves fit properly and are they made of the proper fabric?		

11. Does the partner avoid contact with sharp edges when performing the task?		
12. When needed, are push buttons designed properly?		
13. Do the job tasks allow for ready use of personal equipment that may be required?		
14. Are high rates of repetitive motion avoided by		
job rotation?		
self-pacing?		
sufficient pauses?		
adjusting the job skill level of the worker?		
15. Is the partner trained in		
proper work practices?		
when and how to make adjustments?		
recognizing signs and symptoms of potential problems?		

1. PURPOSE

Prompt response to medical emergencies by first responders and the longer-term management of work-related cases can limit the severity of such cases and reduce associated medical expenses. The primary value of these services is the protection and maintenance of the health and well-being of COVENANT SERVICES employees.

2. RESPONSIBILITIES

1. Prompt first aid care is critical to controlling the severity of most injuries. It is our policy to utilize emergency response team members (who are trained in CPR/first aid) as first responders for partner or visitor injuries. Local emergency medical professionals will be contacted and utilized to respond to all significant partner or visitor injuries.
2. Partners who are not specifically trained in CPR/first aid should refrain from putting themselves at risk or in contact with blood or other bodily fluids during an injury situation.

FIRST AID TREATMENT OVERVIEW

Introduction

The emergency response team members (specifically trained in CPR/first aid) are anticipated to be first aid responders for all minor injuries. This section describes what to do when a situation arises where first aid is required.

Since our facilities are located primarily in urban areas within proximity to a variety of outside emergency medical services, it is our policy to utilize these outside services for all significant injury response.

Emergency Situations

Follow the steps below in the event of an emergency that requires medical attention.

1. To help, you should take action. If you are the first on the scene of an injury or serious illness, you are the critical link between the victim and emergency care. Immediately call the emergency first responders/emergency medical services designated for the property. Do not assume that someone else has or will. If possible, have someone stay with the victim while you call.

2. Be ready to tell the Emergency Medical dispatcher or first responder the following information:

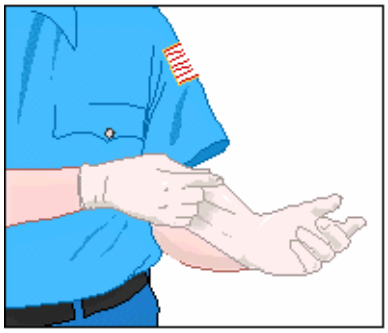
- Where you are, including your address, phone number, office, etc.
- What happened
- The number of victims
- The condition of each victim
- Any first-aid steps being provided

3. Do not hang up until the dispatcher tells you to do so

Take Precautions

After you have contacted the appropriate emergency medical service and triggered their involvement, you may decide to voluntarily provide first aid. Some serious illnesses, such as AIDS and hepatitis, are carried in body fluids, especially in blood. If you choose to respond you can reduce your risk of infection by using the following safe first aidmeasures:

- **Wear gloves** to avoid contact with the victim's blood. Put on gloves before you begin first aid. Responder kits that include gloves are provided in all First Aid and First Responder kits.
- **Always wash hands immediately** after removing gloves or following any contact with blood or potentially infectious fluids. If a sink isn't available, use an antiseptic cleanser (alcohol, 10% household bleach solution, etc.) and then wash with soap and water as soon as possible.



First Aid Kits

Occasionally small incidents will arise where outside emergency assistance is not required, but if there is any doubt, contact the emergency medical service.

Each facility should maintain a record of all first aid cases. See **Appendix A, First Aid Log**. Anyone using supplies should fill out the appropriate information.

Each facility should have a first aid kit that includes the following suggested supplies:

Aspirin and Other Oral Analgesics

Aspirin and other oral analgesics such as headache remedies are not considered first aid supplies and may not be kept in the first aid kit.

Replenishment

The first aid kit should be evaluated and replenished on a regular basis.

- Weather proof box
- Tweezers
- Adhesive strips
- Triangular bandage
- Antiseptic wipes
- First aid cream
- Burn Cream
- Latex gloves
- Dressing
- Scissors
- Abdominal pad
- Eye wash
- Cold pack

Appendix A

FIRST AID LOG

Date	Supplies Used	Employee Name

1. PURPOSE

This program establishes exposure and infection control procedures for certain personnel who may be engaged in first response, treatment or cleanup of an injury. It is designed for employees who could "reasonably anticipate" coming into contact with blood or other potentially infectious materials as the result of performing their job duties.

2. RESPONSIBILITIES

1. All facilities should pre-plan and be prepared for bloodborne exposures and potential infections.

2. Each facility will provide information and training to all employees with potential occupational bloodborne exposures.

BLOODBORNE PATHOGEN OVERVIEW

The purpose of this program is to establish exposure and infection control procedures for certain personnel who may be engaged in the treatment or cleanup of an injury.

This plan covers employees who could "reasonably anticipate", as the result of performing some of their job duties, that they will encounter blood or other potentially infectious materials. Potentially infectious materials include:

- Blood;
- The following body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial, peritoneal fluid, amniotic fluid, saliva and dental procedures, anybody fluid that is visibly contaminated with blood, and all body fluids and situations where it is difficult or impossible to differentiate clean body fluids;
- Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and
- HIV containing cell or tissue cultures, organic cultures, and HIV and HBV containing culture medium or other solutions; and blood, organs or other tissues from experimental animals infected with HIV and HBV.

COVENANT SERVICES Bloodborne Pathogen Policy

In an emergency situation, the disease status of the injured or ill employee is most often unknown by the emergency response personnel; therefore, all will be considered infectious. Blood and body fluid precautions must be taken in all situations.

To minimize the risk of exposure, COVENANT SERVICES will provide emergency response personnel
with proper infection control, protective equipment including gloves, face and eye shields, and will provide necessary cleaning and disinfecting supplies.

Initial instructions and continuing education in preventive health care practices will be given so that emergency response personnel members possess a basic awareness of infectious diseases, understand the risks and severity of various types of exposure, and use proper skills in infection control.

Prophylactic medical treatment will be given to exposed response personnel and necessary immunizations will be made available to protect members from potential exposure to infectious disease.

Emergency response personnel must contact the Infection Control Representative (Human Resource Manager) after any actual or suspected occupational exposure to an infectious disease. The infection control representative will contact the hospital or health department to initiate patient follow-up and determine the need for treatment of the exposed individual. The exposure tracking system becomes a component of the medical record system that is maintained for each member.

EXPOSURE RISK DETERMINED BY TASKS

Category I

Job classifications in which all employees are expected to have occupational exposure to blood, body fluids or tissue.

- Emergency Response Members
- Custodians

Category II

Voluntary emergency response groups in which some employees have occupational exposure to blood, body fluids, or tissues.

- Security Officers

Category III

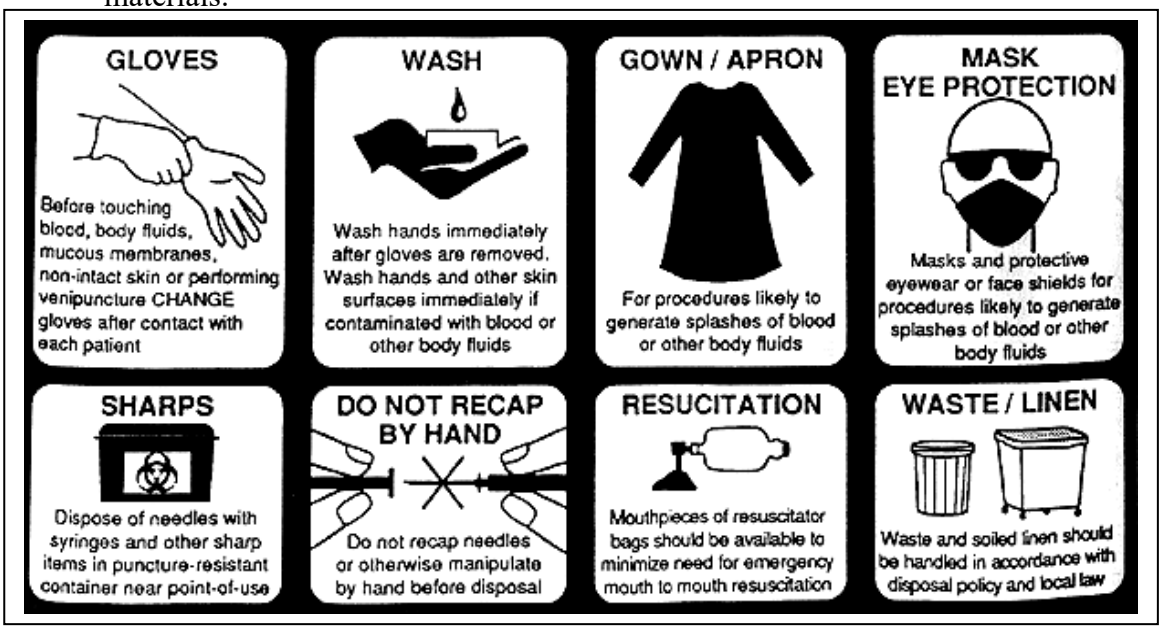
Tasks that may involve occupational exposure to blood, body fluids or tissues if such tasks are performed by employees included in Category II.

- Tasks relating to emergency response procedures, such as administering basic first aid or administering CPR.
- Maintenance
- Engineering

CONTROLS TO REDUCE POTENTIAL EXPOSURE RISK

1. **Engineering Controls** – Devices and other approaches to modify the work environment to reduce occupational exposure risk; i.e., sharp containers and related waste management procedures.

2. **Standard Precautions** – Health care workers must consider ALL patients as potentially infected with bloodborne pathogens. "Standard Precautions" should be followed when workers are exposed to blood and certain other potentially infectious materials.



3. Protective Clothing and Equipment

- Gloves
- Protective eyewear or face shield

- Masks
- Gowns
- Shoe coverings

4. Cleaning and Decontaminating Spills of Blood and Potentially Infectious Materials

- Clean-up of all incidents will be done utilizing chemical germicides that are approved for use as "hospital disinfectants." All spills of blood and other potentially infectious materials will be promptly cleaned while wearing gloves.
- If splashing is anticipated, protective eyewear will be worn along with an impervious gown, which provides an effective barrier to splashes. In the event of gross spills, caps and shoe coverings will also be worn.
- The area will be decontaminated with anti-viral compound.
- Hands will be washed following removal of gloves.
- Soiled cleaning equipment will be cleaned and decontaminated or placed in infectious medical waste bag along with any other blood-soiled items.

5. Hepatitis B Vaccination

- H-E-B will make available the Hepatitis B Vaccine and vaccination series to all employees who have occupational exposure.
- Hepatitis B vaccine and vaccination series will be made available at no cost to associates.
- Hepatitis B vaccine and vaccination series will be made available and will be performed by or under the supervision of a licensed physician or by or under the supervision of another licensed health care professional.
- The Hepatitis B vaccine and vaccination series will be provided according to current recommendations of the U.S. Public Health Service at the time the vaccination or vaccination series is provided.
- All laboratory tests related to the Hepatitis B vaccine and vaccination series will be conducted by an accredited laboratory at no cost to associates.
- Hepatitis B vaccination will be made available after the employee has received training and information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated and the fact that the vaccine and vaccination will be offered free of charge.
- Hepatitis B vaccination will be made available to a employee within ten (10) working days of initial assignment to all employees who have occupational exposure, unless the employee has previously received the complete Hepatitis B

vaccination series or antibody testing has revealed that the employee is immune, or the vaccination is contraindicated for medical reasons.

- Participation in a pre-screening program is not a prerequisite for receiving the Hepatitis B vaccination.
- Any employee who initially declines the Hepatitis B vaccination, but at a later date while still employed by COVENANT SERVICES is in a position where occupational exposure exists and later decides to accept the vaccination, then the Hepatitis B vaccination will
  be made available to that employee at that time at no cost to the associate.
- Any employee, who declines to accept the Hepatitis B vaccination, must sign the Hepatitis B Vaccine Declination Form, a copy of which is attached to this Exposure Control Plan.
- If a routine booster dose of Hepatitis B vaccine is recommended by the U.S. Public Health Service at some future date, such a booster dose(s) shall be made available at no cost to the associate.

POST EXPOSURE EVALUATION AND FOLLOW-UP

1. Each employee is required to immediately report any exposure incident. Failure to do so will result in discipline up to and including discharge. An exposure incident is a specific eye, mouth or other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an associate's duties.

2. Following a report of an exposure incident, COVENANT SERVICES will make immediately available to the exposed associate, a confidential medical evaluation and follow-up.

3. This medical evaluation and follow-up will be made available at no cost to the associate.

4. The medical evaluation and follow-up will be performed pursuant to any appointment(s) made by the employee. The medical evaluation and follow-up will be performed by or under the supervision of a licensed physician or by or under the supervision of another licensed health care professional and will be provided according to current recommendations of the U.S. Public Health Services in effect at the time. All laboratory tests related to the post exposure evaluation and follow-up will be conducted by an accredited laboratory at no cost to the associate.

5. The post exposure medical evaluation and follow-up will include at least the following:

   - Documentation of the route(s) of exposure and the circumstances under which the exposure incident occurred.

- Identification and documentation of the source individual, unless COVENANT SERVICES determines that identification is infeasible or prohibited by law.
- The source individual's blood will be tested as soon as feasible, after consent is obtained to determine HBV and HIV infectivity. If consent is not obtained, COVENANT SERVICES will document that the required consent cannot be obtained. If the source individual's consent is not required by law, the source individual's blood, if available, shall be tested and the results documented. If, however, the source individual is already known to be infected with HBV or HIV, testing for the source individual's HBV or HIV status does not need to be repeated. Results of the source individual's testing will be made available to the exposed employee and the employee will be informed of all applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

6. Collection and testing of the exposed associate's blood for HBV and HIV Serological Status

- The exposed associate's blood shall be collected as soon as feasible and tested after consent is obtained.
- If the employee consents to base line blood collection but does not give consent at that time for HIV serological testing, the sample shall be preserved for at least ninety (90) days of the exposure incident the employee elects to have the base line sample tested, such testing shall be done as soon as feasible.

7. Information Provided to the Health Care Professional

COVENANT SERVICES will insure that the health care professional responsible for a employee's Hepatitis B vaccination is provided with the following information:

- A copy of the OSHA Bloodborne Pathogen Regulations;
- A description of the exposed associate's duties as they relate to the exposure incident;
- Documentation of the route(s) of exposure and circumstances under which exposure occurred;
- All medical records relevant to the appropriate treatment of the employee including status which is maintained by the employer.

8. The Health Care Professional's Written Opinion

- The Company shall obtain and provide the employee with a copy of the evaluating health care professional's written opinion within fifteen (15) days of the completion of the evaluation.

- The written opinion for Hepatitis B vaccination shall be limited to whether Hepatitis B vaccination is indicated for an employee and if the employee has received such vaccination.
- The health care professional's written opinion for post exposure evaluation and follow-up will be limited to the following:
  - That the employee has been informed of the results of the evaluation;
  - That the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.

  NOTE: All other findings or diagnoses shall remain confidential and will not be included in the written report.

MEDICAL INFECTIOUS WASTE MANAGEMENT

Regulated Waste

- All sharps; this includes needles, glass vials, scalpels or anything that has a potential to be sharp when broken.
- Any disposable material that comes in contact with blood and/or body fluid.
- Expired medication.

How to Handle

1. Sharps
   - Collected in the room generated in.
   - Do not recap needles
   - Do not clip or bend needles
   - Do not disengage needles from disposable syringes.
   - Place in a sharps puncture proof container and keep covered.
2. Materials that have come in contact with blood and/or body fluids that are disposable:
   - Place in a red or orange disposable, sealable, plastic leak proof polyethylene bag with the biohazard label.
   - When the bag is ¾ full, close the bag with plastic or tape.
   - Place in a standard corrugated construction.
     - Single wall corrugated construction.

- Must be at least 200 lb. Mullen Test (burst strength)
- All cartons will bear the box mfg. Code indicating the specification of the container.
- Box shall not be loaded to exceed a maximum carrying weight of 45 pounds.

- Place the mil liner in the box. Do not compact the waste. Place the taped/or tied ends on top.
- The box must have either the Universal Bio Hazard symbol or words "Infectious Waste" present.

3. Manifest Procedure

- Generator code number.
- Generator name, address, phone number.
- Number of manifests used.
- Date shipped
- Shipping name, quantity and container size of materials to be shipped.
- Generator must sign and date in appropriate space.
- Primary transporter's name, address, phone and DOT number
- Complete transporter exception section indicating any unusual conditions.
- Transporter then signs for receipt of wastes and provide the generator with the first copy of manifest.
- After the materials are incinerated by licensed waste management company, a completed copy of the manifest with a certification of destruction will be returned to the generator.
- Generator's permanent record will be kept in permanent records for at least three years.

Spill Procedure

Clean up will be done as soon as possible by personnel with appropriate personal protection equipment; procedures will include the following steps:

- Decontaminate the area with ½ cup dilution of household bleach in one gallon of water for 30 minutes.
- Place the waste in appropriate biohazard container for disposal. **Always wear gloves.**
- Wash hands after gloves are removed.

Department with open injuries resulting in infectious waste will dispose of the material in a leak proof, sealable red or orange plastic bag with the Bio Hazard label and bring it to the clinic for disposal with the above procedure.

EMPLOYEE TRAINING AND INFORMATION

COVENANT SERVICES will provide information and training to all employees with potential occupational exposure. This training will be provided at no cost to employees and will be provided during regular working hours. Employees who do not speak English will be provided training in a language which they do understand.

Timing of Training

Training will be provided as follows:

- At the time of initial assignment to tasks where occupational exposure may take place;
- At least annually thereafter; and
- Whenever modification of tasks or procedures or institution of new tasks or procedure affect the associate's occupational exposure.

The Training Program

The training program will contain the following elements:

- A copy of the OSHA Blood borne Pathogens Standard and an explanation of its contents;
- A general explanation of the epidemiology and symptoms of blood borne diseases;
- An explanation of the modes of transmission of blood borne pathogens;
- An explanation of the employer's Exposure Control Plan and a copy of this Plan;
- An explanation of appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials;
- An explanation of the use and limitations of methods that will prevent or reduce exposure including, appropriate engineering controls, work practices and personal protective equipment;
- Information on the types, proper use, location removal, handling, decontamination and disposal of personal protective equipment;
- An explanation of the basis for selection of personal protective equipment;

- Information on the Hepatitis B vaccine, including information on its efficacy, safety, method of administration, the benefits of being vaccinated and the fact that the vaccine and vaccination series will be offered free of charge;
- Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials;
- An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available;
- Information on the post exposure evaluation and follow-up that is provided for the employee following an exposure incident;
- An explanation of signs, label and/or color-coding for communication of hazards and an opportunity for interactive questions and answers with the person conducting the training session.

RECORDKEEPING

Medical Records

The company will establish and maintain medical records that will include the following:

- The name and social security number of the associate;
- A copy of the associate's Hepatitis B vaccination status, including dates of all Hepatitis B vaccinations and any medical records relative to the associate's ability to receive the vaccination;
- A copy of all results of examinations, medical testing and follow-up procedures;
- The Company's copy of the health care professional's written opinion;
- A copy of the information provided to the health care professional by the Company.

NOTE: All employee medical records will be kept confidential and will not be disclosed or
reported without the associate's express written consent, except as required by law.

Training Records

COVENANT SERVICES maintains the following training records:

- The dates of the training sessions;
- The contents and/or summary of the training session;
- The names and qualifications of persons conducting the training;
- The names and job titles of all persons attending the training session.

Retention of Records

All records related to an employee kept by COVENANT SERVICES under the Exposure Control Plan will be retained for as long as feasible, but in no case for less than 30 years after the employee leaves the Company's employment.

APPENDIX A

CONSENT
FORM
HEPATITIS B VACCINE DECLINATION
(MANDATORY)

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

_____ _____

Employee Signature Date

_____ _____

Print Name Department

_____

Job Title

1. PURPOSE

Proper machine design, operating procedures and training are the preferred methods for reducing accident potential in machine operations. When hazards cannot be eliminated by design, proper guarding and good safety practices are an effective means of preventing personal injury.

2. RESPONSIBILITIES

1. Moving parts of machinery or equipment expose our employees and contractors to injury.
2. This section outlines the different types of guards, which are used on equipment and the rationale for each use. All affected employees should be trained on the guards, which should be present on machines or equipment that they work upon or near.
3. Machines should not be operated or used unless all the proper guards are in place.

MACHINE GUARDING PROGRAM OVERVIEW

Any part of a machine that moves presents a hazard. Guarding helps eliminate or control this danger.

Those actions or motions classified as the most dangerous are rotating, in-running nip points, cutting actions, punching, shearing, and bending.

Even a smooth shaft rotating slowly can grasp clothing or hair, or upon mere skin contact, force an arm or hand into a dangerous position.

Couplings, cams, clutches, flywheels, shaft ends, rotating bar stock, and horizontal or vertical shafting are examples of rotating mechanism which are hazardous. Other rotating mechanism, in many cases located inside a stationary case or shell, are revolving cylinders, screw conveyors, agitator blades, and paddles.

The operator should always be aware of the danger that is present when machine parts rotate toward each other, or when a part rotates toward a stationary object. These are called in-running nip points. An operator can be severely injured if any part of his body is caught and drawn in at these points. The in-running side of printing presses is an example. Others are the in-running side of a chain and sprocket, belt and pulley, a gear rack or a belt conveyer terminal.


HOBART

HOW TO GUARD MACHINES

Guards should meet these minimum general requirements:

- **Prevent Contact** – The guard should prevent hands, arms, or any part of your body or clothing from making contact with dangerous moving parts.

- **Secure** – Guards should not be easy to remove or alter. Guards and safety devices should be made of durable material that would withstand the conditions of normal use. They should be firmly secured to the machine.
- **Protect from falling objects** – The guard should ensure that no objects could fall into moving parts.
- **Create no new hazards** – If a guard creates a hazard of its own such as shear point, a jagged edge, or an unfinished surface which can cause a laceration, then do not use the piece of machinery or equipment until repairs are made. The edges of guards, for instance, should be rolled or bolted in such a way that they eliminate sharp edges.

TYPES OF MACHINE GUARDS

Whenever the actions or motions of a machine present a hazard, it is essential that well-constructed, foolproof guards protect the operator and fellow employees. There are four kinds of guards:

1. Enclosure

2. Interlocking

3. Automatic

4. Remote Control

Enclosure Guards

The fixed enclosure guard is preferable to all other types because it prevents access to dangerous moving parts by enclosing them completely. The guard admits materials but would not admit hands because the size of the feed opening is limited.

Interlocking Guards

This type of guard consists of a barrier that shuts off or disengages power, preventing the machine from starting when the guard is open. It also prevents the opening of the guard while the machine is under

power or coasting.

Automatic Guards

When enclosure or interlocking guards are not practicable, an automatic guard may be used. Repeating its cycle as long as the machine is in motion, this guard actually pulls the operator's hands, arms or body from the danger zone as the ram, plunger, or other tools close on the work being done.

Remote Control

A two-handed trip system may be used to start a machine. These devices require the simultaneous action of both of the operator's hands on electrical switches, air control valves, or mechanical levers.

All managers should be familiar with the machine guarding standards that apply to the machines they use.

MACHINE GUARDING GUIDELINES

- If a guard is defective or damaged report it to yoursupervisor.
- Do not remove a guard for any reason while operating any piece of machinery or equipment.
- Always use the proper piece of machinery or equipment for the job.
- All belts, pulleys, shafts, flywheels, couplings, and other moving power transmission parts should be securely guarded.
- Flywheels, or fans, located so that any part is 7 feet or less above a floor or platform should be guarded with an enclosure.
- All exposed parts of horizontal shafting should be enclosed in a metal or wire cage securely fastened to the floor or frame of the machine.
- Projecting shaft ends should be guarded by non-rotating caps or safety sleeves.
- Pulleys or sheaves 7 feet or less from the floor should be guarded with metal or wire mesh enclosures.

1. PURPOSE

The unexpected startup of machinery or equipment during maintenance, testing, or repairs can lead to significant injury or employee fatality. Site specific procedures are needed at each COVENANT SERVICES facility to ensure equipment or machinery is properly de-energized prior to work being performed on it.

2. RESPONSIBILITIES

1. Each facility should develop a site specific, written energy control program designed to be used during machine/equipmentmaintenance and repairs.

2. All applicable employees should be trained in the energy control plan and demonstrate their knowledge of it. See **Appendix A, Employee Training Attendance Record**.

3. The program should include the following elements:

- A list of all equipment or other energy sources that require lockout/tagout
- Machine-specific steps, which should be followed to ensure that energy is fully drained before powered equipment is serviced or maintained. See **Appendix B, Energy SourceSurvey**.
- Procedures to prevent machines from being turned on or restarted accidentally
- Assigning lockout responsibilities to specific authorized employees
- Plans to test procedures annually and correct any problems

4. On at least an annual basis, management should conduct an audit of the program and observe employees performing lockout/tagout procedures to determine if the proper steps are being following and verify the effectiveness of the program.

ENERGY CONTROL PROGRAM (LOCKOUT/TAGOUT) OVERVIEW

The Energy Control Program or Lockout/Tagout procedures help provide a means of insuring that machinery or equipment is isolated from potential hazardous energy sources and “locked” and “tagged” out before performing any service or maintenance activities.

All locations should have a written energy control program and workers have a right to review this program. Its key elements are:

- A list identifying all energy sources (equipment, etc.) that require lockout/tagout

- Procedures to ensure that energy is fully drained before powered equipment is serviced or maintained
- Procedures to prevent machines from being turned on or restarted accidentally

- Assigning lockout responsibilities to specific authorized employees
- Plans to test procedures annually and correct any problems

OSHA requires training certain employees to know the type and amount of energy their machines and equipment use, how to control it, and specific lockout procedures to follow. Only these ***authorized employees*** can perform lockout procedures or remove locks or tags.

In addition, ***affected employees*** who work with or around the equipment in question need training to understand the importance and use of energy control procedures.

Authorized employee – a employee who performs servicing or maintenance on machines or equipment.

Affected employee– a employee who performs the duties of his or her job in an area in which the energy control procedure is implemented and servicing or maintenance operations are performed.

All other employees who may be in the area need enough training to understand why they should never try to restart or energize equipment that is locked or tagged.

One rule should be clear to all employees: ***never ignore, bypass, or try to circumvent locks or tags*****! RESPONSIBILITIES**

Standardized Locks, Tags, and Procedures

The standard is very particular; regarding the specific locks and tags to be used. The whole facility should use the same kind of lock for all lockouts—and only for lockout. The locks should be strong enough to withstand all but heavy force or tools, durable enough for the area's conditions, and identified with the name of the authorized employee who performs installation and removal.

Locks & Tags are:

- Standardized throughout the facility
- Strong enough to withstand all but heavy force or tools
- Used only for lockout
- Durable enough for conditions where they'reused
- Identified with name of authorized employee who installs and removes them

Employee Training

Department managers with assistance from appropriate technical support should make a survey to locate and identify all isolating devices. Managers should be certain which switch(es), valve(s) or other energy-isolating devices apply to the equipment to be locked out. More than one energy source (electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy sources) may be involved.

Department managers working with the appropriate technical support should develop lockout procedures using the following format:

- Name of equipment/machine and manufacturer

- Type(s) and Magnitude(s) of energy and hazards
- Name(s)/Job Title(s) of employees authorized to lockout
- Name(s)/Job Title(s) of affected employees and how to notify
- Type(s) and Location of energy isolating means
- Type(s) of Stored Energy Methods to dissipate or restrain
- Method(s) Selected–i.e., locks or additional safety measures
- Type(s) of Equipment checked to ensure disconnection
- Name(s)/Job Title(s) of employees authorized for group lockout

Department managers should assure that employees are instructed in the safety significance of the lockout procedure. Each new or transferred employee and other employees whose work operations are or may be in the area also should be instructed in the purpose and use of the lockout procedure.

Retraining is also required for all employees whenever there is a change in their job assignments, a change in machines, equipment or processes that present a new hazard, or when there is a change in the energy control procedures, or revealed by inspection.

The retraining should re-establish employee proficiency and introduce new or revised control methods and procedures, as necessary.

Documentation of training and/or retraining should be kept on file. At a minimum, the documentation should include a signed statement by both the trainer and the trainee as to:

- What was taught
- Date of training
- How training conducted

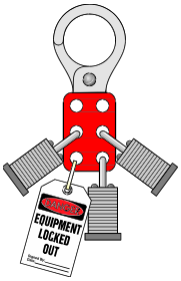
PROCEDURES

1. Notify all affected employees that a lockout system is going to be utilized and the reason for the program. The authorized employee should know the type and magnitude of energy that the machine or equipment utilizes and should understand the hazards associated with the equipment.

2. If the machine or equipment is operating, shut it down by the normal stopping procedure (examples could be *depress stop button, open toggle switch, etc*.).

3. Operate switch, valve, or other energy isolating device(s) so that the equipment is isolated from its energy source(s). Stored energy such as that in springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) should be dissipated or restrained by methods such as repositioning, block, bleeding down, etc

4. Lockout the energy-isolating devices with assigned individual lock(s).



Lockout Device

Bailer is showing warnings and electrical box for Lockout/Tagout.

If there is a possibility of re-accumulation of stored energy, verification should be performed and continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists. **CAUTION: RETURN OPERATING CONTROLS TO NEUTRAL OR "OFF" POSITION AFTER EACH TEST**.

The equipment is now locked out.

In the preceding steps, if more than one individual is required to lockout equipment, each should place his or her own personal lockout device on the energy-isolating device(s). When an energy-isolating device cannot accept multiple locks, a multiple lockout device (hasp) may be used. If lockout is used, a single lock may be used to lockout the machine or equipment, with the key being placed in a lockout box or cabinet which allows the use of multiple locks to secure it. Each employee should then use his or her own lock to secure the box or cabinet. As each person no longer needs to maintain his or her lockout protection, that person should remove his or her lock from the box or cabinet.

There are two exceptions to these procedures:

1. If a group performs service or maintenance, one employee has primary responsibility and all team members put on their own lock or tag.

2. If energy has to be on in order to test or position equipment during maintenance or repair, follow all lockout removal steps first. After testing or positioning the equipment, follow all lockout steps to turn power off again.

Restoring Machines or Equipment to Normal Operations

After the servicing and/or maintenance is completed and equipment is ready for normal production operations, check the area around the machines or equipment to ensure that no one is exposed.

After all tools, have been removed from the machine or equipment, guards have been reinstalled, and employees are in the clear, remove all lockout devices. Operate the energy-isolating devices to restore energy to the machine or equipment.

Emergency Removal of Padlock

In the event a lockout device should be removed by anyone other than the person who installed the lockout, the managers should comply with the following steps and document in writing to the location Safety Coordinator.

- Call employee
- Attempt outside facility contact
- Notify associate's supervisor
- Notify safety coordinator or designate
- Remove lock

Periodic Inspections

A periodic inspection of each procedure, when usage is at least once a year, should be performed at least annually to assure that the energy control procedures continue to be implemented properly and that the employees are familiar with their responsibilities under those procedures.

The periodic inspections should be designed to correct any deviations or inadequacies observed. An authorized employee other than the one(s) using the energy control procedure should perform the periodic inspections and documentation of the activity should be maintained.

The documentation should identify the machine or equipment on which the energy control procedure was used, the date of the inspection, the employees included in the inspection, and the name of the person performing the inspection. For a lockout procedure, the periodic inspection should include a review between the inspector and each authorized associate. The employee's responsibilities under the energy control procedure being inspected should be reviewed. When a tagout procedure is inspected, a review on the limitation of tags, in addition to the above requirements, should also be included.

Examples of Lockout Tags

Illustrated below are examples of lockout tags, which should be used in conjunction with the actual lock. Some facilities have also incorporated a picture of the employee who is performing the lockout as an additional method of personalizing the tag and impressing upon others that it should not be removed. All facilities should have a readily available supply of tags on hand and employees who routinely perform lockouts should have their own inventory of standard or personalized tags.


DANGER
LOCKED
OUT
DO NOT
REMOVE
Signed By:_____
Date:_____


DANGER
LOCKOUT
IN
PROGRESS
Signed By:_____
Date:_____

Appendix A

EMPLOYEE TRAINING ATTENDANCE RECORD

Energy Control Program (Lockout/Tagout)

Date of Training _____

Level of Training: (Check One)
Authorized Employee____
Affected Employee _____
Other Employee _____

Instructor _____

Description of Training - Describe classroom training and hands on training in facility (including equipment covered) and identify training materials used.

_____

_____

_____

_____

_____

_____

_____

List of Employees Attending:

_____ _____

_____ _____

_____ _____

_____ _____

_____ _____

Appendix B

ENERGY SOURCE SURVEY

See Instructions on Back Side
(Corresponding to the footnoted numbers)

Equipment Name:_____ Date Issued: _____

Equipment Number:_____ Issued By: _____

Component Name (1):_____(optional) Date Reviewed: _____

Location:_____ Reviewed By: _____

Energy Source (2)	Is There a Local Energy Isolating Device? (3)		Is the Device Dedicated (D) Or? Shared (S)	Is the Device Lockable ?	Is the Device Labeled?	Can You Achieve a Zero Energy State? (6)	Equipment Modifications Needed to Achieve Lockout/Tagout At a Zero Energy State (7)	
List energy sources	Yes/ No	Walking Distance (4)	D/S	Yes/No	Yes/No	Yes/No	Modifications	Time to Complete

Energy Source Survey Instruction Sheet

(1) If the piece of equipment is too complicated for one sheet, please use separate sheets for each component.

(2) List all sources of energy –for example:

Electric - list all voltages; volts (or Elec.-440)	Air - list all pressures; for example Air 60 psig	Mechanical, Steam, Chemical for example 440 Gas, Thermal, Hydraulic

The reference to a particular type of energy includes the mechanical energy it generates. For example, "electric" includes electro/mechanical. The term "mechanical energy" refers to extended or compressed springs, elevated machine members, coasting flywheels, etc.

(3) Energy Isolating Device: A mechanical device that physically prevents the transmission or release of energy. Examples include a manually operated circuit breaker, a disconnect switch, a slide gate, a slip blind, a line valve, a block and any similar device. The term does not include a push button, selector switch, emergency stop, electrical interlock (micro switch, etc.) or other control circuit-type devices.

(4) Walking Distance: state in feet and number of stairs (if applicable) from operator's position.

(5) Dedicated: controls only that piece of equipment (or component); Shared: controls that piece of equipment (or component) and others.

(6) Zero Energy State: Zero Energy State can be achieved if: 1) the equipment can be isolated from all energy sources, 2) all stored energy (in springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam or water pressure, etc.) can be dissipated or restrained by methods such as repositioning, blocking, bleeding down, etc.

(7) Modifications: Equipment modifications should be listed if you cannot currently lockout/tagout the equipment (or component) and achieve a zero-energy state. In addition, equipment modifications should be listed even if you can lockout/tagout and achieve a zero-energy state if the currently available means of doing so would cause serious problems in other directions (such as ergonomics or other safety issues, quality control or productivity).

1. PURPOSE

Falls from elevated work areas are the second leading cause of death each year in occupational settings. The majority of these cases involve working on stairs, steps, ladders, scaffolds, or elevated work platforms. Designing buildings and structures within buildings for maintenance, as well as performance, is of primary importance in eliminating elevated fall hazards. Additionally, precautions are taken to protect personnel working in the area of elevated work activities.

2. RESPONSIBILITIES

1. The fall protection program must be incorporated for any fall exposure greater than 4 feet.
2. It should also be incorporated for exposures of less than 4 feet whenever possible.
3. Each facility or location should identify areas of potential fall exposures. This may be accomplished through a variety of ways including reviewing of past injury records, reviewing and/or conducting facility surveys, and soliciting input from associates.
4. Once areas are identified an analysis should be performed to review controls which are currently in place based on our "Hierarchy of Preference of Controls".
5. For exposures, which may not be adequately controlled a fall protection procedure or plan should be developed and implemented.
6. Periodic monitoring should be performed of our fall protection process to ensure it continues to be effective.

FALL PROTECTION PROGRAM OVERVIEW

COVENANT SERVICES is committed to continuous Fall Hazard Control. Accordingly, our facilities should take all practical measures to eliminate, prevent, and control fall hazards. Work areas and activities should be surveyed to identify hazards of personnel falling from elevations. First consideration should be given to the elimination of the hazard. Second, if a fall hazard cannot be practically eliminated, consideration should be given to implementing effective permanent means of fall prevention.

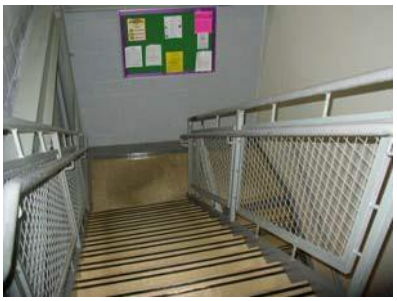
If a fall hazard cannot be eliminated or fall prevention assured, effective fall protection means should be planned, implemented, and carefully monitored to control the risks of personnel injury due to falling. Fall protection systems should be continuous by design and supervision should control against their intermittent or improper use.

All personnel (and their supervisors) working where fall hazards cannot be eliminated, or the onset of falls prevented, should be uniformly equipped, trained, and given refresher training at specified intervals to minimize adverse effects of accidental falls. Fall protection equipment and training standards should be established and followed. Furthermore, compliance by outside contractors should be required when working on company property.

Hierarchy of Preference of Controls

By the term "Safety at Heights," we embrace three topics; the elimination, prevention, and control of falls.

- **Elimination of Fall Hazards.** Elimination of fall hazards is the first and best line of defense against falls from heights. Preplanning work at the site not only leads to elimination of the hazard, but also identifies alternative approaches to the work that can measurably enhance productivity.
- **Prevention of Falls.** Preventing falls is the second line of defense when fall hazards cannot be entirely eliminated. It involves making changes to the workplace to prevent the need to rely on the worker's behavior and personal protective equipment to prevent falls. Examples include but are not limited to: use of stairs, guardrails, and barriers to prevent the worker from direct and unprotected exposure to the fall hazard. All floor openings should remain covered at all times. Railings should remain on stairways and around elevated platforms at all times.



- **Control of Falls.** Controlling falls is the last line of defense. It should be considered only after determining that the fall hazard cannot be eliminated or the possibility of falling prevented. This is the area of fall protection that calls for equipment such as: safety nets or full body harnesses, lanyards, shock absorbers, fall arresters, lifelines, and anchorage connectors. It deals with reducing the risk of injury in falling after onset of the fall. This fall protection also necessitates workplace and work process assessment and planning in order to select the proper equipment, installation, and proper use of gear.

  Employees working from cherry pickers, lift trucks which elevate the operator, aero lifts, man lifts or similar equipment are required to wear full body harnesses with retractable lanyards.

Fall Hazard Control Function and Staffing

Execution of the Fall Protection Policy requires participation by company associates, subcontractors, and other on-site personnel. This necessary participation may be achieved through several means. The most common is a Safety Meeting discussion and job specific training for applications requiring fall protection as work progresses.

IDENTIFICATION OF FALL HAZARDS

The facility supervisor should assure that fall hazards within their facility are: (1) identified, (2) evaluated, and (3) controlled. There are at least four basic ways to identify fall hazards.

- **Accident/Incident Record Review.** Accident/incident records that give a description of how an accident or incident occurred can be helpful. You may find the work and condition that led to a previous fall are still being performed in the same way at that same location. You may also realize that this work is being performed at other locations in the same way.
- **Canvas Surveys.** Canvas surveys have the advantage of being able to obtain information from a large number of workers relatively easily. Although surveys sometimes give incomplete information, they may also reveal a lack of awareness in the work force that is useful to know in planning future training, instruction, and warning steps.
- **Interviews.** The best way to identify fall hazards is to talk to the workers themselves. Sometimes the worker would not actually recognize the hazard and may not appreciate the risk of injury or the likelihood of the fall taking place; but they should know the work that they do at heights and how they do it. Consequently, we can access their knowledge by asking the right questions.
- **Fall Hazard Inspection Surveys.** Another effective way to identify hazards is to invite experienced workers to assist with a walk-through tour of operations. Workers and their supervisors can point out the various places they have to work and can explain what they do to get the job done.

EVALUATION OF FALL HAZARDS

Once a list of fall hazards has been collected, each hazard should be evaluated and prioritized in order of the most dangerous to determine which should be controlled first. As hazards are identified, it will be found that some can be controlled immediately.

- **Proximity to Edge**. Workers who should traverse or perform their work at the edge or within 6 feet of the edge of the fall hazard.
- **Type of Walking/Working Surface.** Workers traversing or working on ice, snow, oily surfaces, surfaces with trip hazards near the edge, and surfaces not recently inspected for capacity verification.

- **Type of Work Performed**. Workers who should push or pull tools or material are more likely to lose their balance and fall. Also, workers who cannot maintain three-point contact (two feet and one hand or two hands and one foot).
- **Exposure Time.** The longer a worker is exposed to a hazard, the greater the likelihood of an accident occurring.

LADDER SAFETY

Since the use of ladders in our facilities is significant, it is important that all employees understand ladder safety policies and procedures.

The following list includes many general ladder safety guidelines that should be understood and practiced:

- One person on a ladder at a time
- Wear shoes with clean, nonskid soles—not leather
- Face the ladder while climbing up or down and hold the side rails with both hands
- Carry tools up or down on a belt or with a rope or hoist, not in your hands
- Work with one hand on the ladder, keeping your tools in a hanger or holder
- Don't step on the top two stepladder steps or top four ladder rungs
- Keep your body centered on the ladder so your belt buckle is between the side rails
- Don't move a ladder while you're on it
- Keep your own movements on a ladder slow and cautious
- Always maintain 3 points of contact to the ladder as you are climbing or descending from it (3 points means one or both hands, and one or both feet should be in contact with the ladder at all times)

- When moving a ladder, it is preferred two people carry it. If, however, an employee must carry it by themselves, they should balance it at the center by positioning the front end is above their head and the back end near the ground.

- Before using any ladder or stepstool inspect the ladder or stepstool to insure it's in good condition.

Step Ladder Categories

Category	Rating	Application
Type IA	300 Pound	Construction areas
Type I	250 Pound	Industry & light construction
Type II	225 Pound	Commercial ladder for light maintenance & office use
Type III	200 Pound	Household use

Ladder Inspection Form

Provided by Werner Co.

Company Name: _____
Please Print

Ladder Reference Number: _____ Dept. _____

Inspector _____ Date. _____

❑ Stepladder

Size _____ ft.

❑ Fiberglass ❑ Aluminum ❑ Wood

Circle Areas of Damage

		Yes	No
Steps:	Loose, Cracked, Bent or Missing	❑	❑
Rails:	Cracked, Bent, Split or Frayed		
	Rail Shields	❑	❑
Labels:	Missing or Not Readable	❑	❑
Pail Shelf:	Loose, Bent, Missing or Broken	❑	❑
Top:	Cracked, Loose or Missing	❑	❑
Spreader:	Loose, Bent or Broken	❑	❑
General:	Rust, Corrosion or Loose	❑	❑
Other:	Bracing, Shoes, Rivets	❑	❑

Actions: ❑ Ladder tagged as damaged & removed from use
❑ Ladder is in good condition

❑ Extension Ladder

Size _____ ft.

❑ Fiberglass ❑ Aluminum

Circle Areas of Damage

		Yes	No
Rungs:	Loose, Cracked, Bent or Missing	❑	❑
Rails:	Cracked, Bent, Split or Frayed	❑	❑
Labels:	Missing or Not Readable	❑	❑
Rung Locks:	Loose, Bent, Missing or Broken	❑	❑
Hardware:	Missing, Loose or Broken	❑	❑
Shoes:	Worn, Broken or Missing	❑	❑
Rope/Pulley:	Loose, Bent or Broken	❑	❑
Other:	Bracing Rivets	❑	❑
General:	Rust, Corrosion or Loose	❑	❑

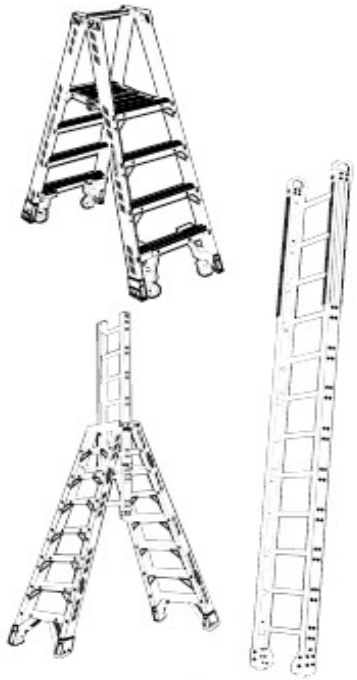
Actions: ❑ Ladder tagged as damaged & removed from use
❑ Ladder is in good condition

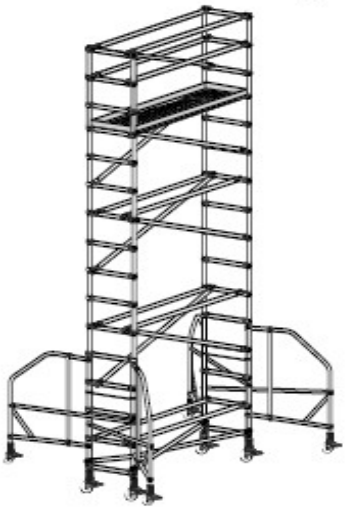
Ladder Inspection Form Provided by Werner Co.

❑ **Specialty Ladder**

❑ Fiberglass ❑ Aluminum ❑ Wood

Model Number: _____





Mark all that apply		Yes	No
Steps/Rungs:	Loose, Cracked Bent or Missing	❑	❑
Rails:	Cracked, Bent, Split or Frayed	❑	❑
Labels:	Missing or Not Readable	❑	❑
Hardware:	Missing, Loose or Broken	❑	❑
Fasteners:	Rust, Corrosion, Loose or Missing	❑	❑
Top:	Cracked, Loose, or Missing	❑	❑
Spreader:	Loose, Bent or Broken	❑	❑
Outriggers:	Missing, Rust, Corrosion or Loose for scaffolding	❑	❑
General:	Rust, Corrosion or Loose	❑	❑
Hinges:	Loose, Bent or Missing	❑	❑
Locks:	Loose, Bent, Broken or Missing	❑	❑
Bracing Front,Rear:	Loose, Bent, Broken or Missing	❑	❑
Rivets:	Rust, Corrosion, Loose, Missing	❑	❑
Shoes:	Worn, Broken or Missing	❑	❑
Platform:	Loose, Bent, Broken or Missing	❑	❑
Rail Shield:	Missing or Loose	❑	❑
Shoulder Bolt:	Rust, Corrosion or Loose	❑	❑
Casters:	Rust, Corrosion or Loose for scaffolding	❑	❑

Actions: ❑ Ladder tagged as damaged & removed from use

❑ Ladder is in good condition

I. PURPOSE

This procedure applies to all COVENANT SERVICES locations when performing operations which meet the definition of a
Permit Required Confined Space as per the requirements of 29 CFR OSHA 1910.146.

A. The Plant Manager/Site Supervisor is responsible to coordinate in conjunction with the Safety Coordinator the provisions of this program.

B. The Plant Manager/Site Supervisor is responsible to assure that no employee is assigned to a task within a confined space until the provisions of this program have been met.

II. INTRODUCTION

It is the policy of H-E-B to communicate and enforce the requirements of the Confined Space Entry Procedure for all activities requiring the implementation of its provisions for all persons of COVENANT SERVICES, contractor employers and other visitors.

Should other Confined Space Entry Procedures be already established on a site, the Safety Coordinator will review these procedures to determine compliance with applicable state and federal regulations and make the determination whether COVENANT SERVICES employees will follow this Procedure or the established procedure already in place on the site.

This policy covers minimum performance standards applicable to all COVENANT SERVICES employees and locations. Local practices requiring more detailed or stringent rules or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.

III. DEFINITIONS

Acceptable entry conditions	The conditions that must exist in a permit space to allow entry and to ensure that employees involved in a permit-required confined space entry can safely enter into and work within the space.
Attendant	An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit space program.
Authorized entrant	An employee who is authorized by the employer to enter a permit space.
Blanking or blinding	The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line, or duct with no leakage beyond the plate.

Confined space	A space large enough and so configured that an employee can bodily enter and perform assigned work; and has limited or restricted means for entry

	or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and is not designed for continuous employee occupancy.
Double block and bleed	The closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.
Emergency	Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.
Engulfment	The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.
Entry	The action by which a person passes through an opening into a permit-required confined space. "Entry" includes all work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.
Entry permit (permit)	The written or printed document that is provided by the employer to allow and control entry into a permit-required space.
Entry supervisor	The person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.
Hazardous atmosphere	An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness.
Hot work permit	The employer's written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.
Immediately dangerous to life or health (IDLH)	Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.
Inerting	The displacement of the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible.
Isolation	The process by which a permit space is removed from service and completely protected against the release of energy and material into the space.
Non-permit confined space	A confined space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen deficient atmosphere	An atmosphere containing less than 19.5 percent oxygen by volume.
Oxygen enriched atmosphere	An atmosphere containing more than 23.5 percent oxygen by volume.
Permit-required confined space (permit space)	A confined space that has one or more of the following characteristics: contains or has a potential to contain a hazardous atmosphere; contains a material that has the potential for engulfing an entrant; has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or contains any other recognized serious safety or health hazard.
Permit-required confined space program (permit space program)	The employer's overall program for controlling and, where appropriate, for protecting employees from, permit space hazards and for regulating employee entry into permit spaces.
Permit system	The employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry.
Prohibited condition	Any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
Rescue service	The personnel designated to rescue employees from permit spaces.
Retrieval system	The equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

IV. APPLICATION/IMPLEMENTATION

A. Evaluating Confined Spaces

1. H-E-B shall evaluate the workplace to determine if any spaces are permit-required confined spaces. See Appendix A.

2. If permit-required confined spaces are identified, entry is permitted only under these conditions:

   a. The only hazard is an actual or potential atmosphere,

   b. Continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, and

   c. Monitoring and inspection data supports the decision, or

d. To perform initial entry to obtain the data required.

The data collected through paragraphs a-c must be made available to the employee who must enter this space.

3. In order to enter a permit required confined space without developing a written program, instituting a permit system, completing a permit training of entrants, attendants and supervisors, and developing an emergency rescue procedure, all of the following conditions must be met:

a. Any unsafe condition is corrected before removing the cover to the entrance.

b. Entrances are protected to prevent injury of those in the space from objects entering the space.

c. Internal atmosphere is checked with direct reading instruments for the following conditions:

1) Oxygen content
2) Flammable gas or vapors
3) Toxic air contaminants

d. Continuous forced air ventilation is used:

1) Directed as to ventilate the immediate areas where employees will be.
2) Air supply must be from a clean source.

e. The atmosphere within the space is periodically tested.

f. If a hazardous atmosphere is detected, all persons shall immediately leave.

B. Permit Required Confined Space Program

Per OSHA 29 CFR 1910.146, employers are to have in effect a Permit Required Confined Space Written program. This section meets the requirements of the law, only after paragraphs B.2, B.3, B.8, and B.10 of the standard have been completed.

1. Project Survey

Prior to commencement of work the H-E-B Plant Manager/Site Supervisor, Safety Coordinator shall survey the selected work areas and applicable scope of work with respect to possible confined space work activities. Use the Permit Required Confined Space Decision Flow Chart to determine if a particular space is defined as a Permit Required Confined Space. Appendix B.

Based on this survey, if permit required confined space entry will be required

signs barring the words "Danger - Permit Required Confined Space, Do Not Enter" shall be affixed and readily recognizable to the entrance. Employees shall be notified during the new hire orientation and reaffirmed during subsequent weekly safety meeting of the meaning and hazards associated with these spaces.

2. Hazard Evaluation

H-E-B shall determine the hazards associated with the confined space. If such information is not available, or, is insufficient, the H-E-B Safety Coordinator shall perform a hazard assessment of the confined spaces. This information shall be put in text and shall be part of the training program outlined in 1910.146 paragraph B.6 of this section.

3. Procedures for Safe Entry

a. The supervisor responsible for performing the entry work shall be responsible for assuring all connected systems to the confined space are:

- Disconnected and blinded
- Locked and tagged
- Ventilated
- Under no conditions are tags to be used as a sole safe provision on systems which have potential to cause death or serious injury
- Written procedures must be developed for performing these activities

b. The supervisor shall also ensure that:

- Employees have been certified in confined space entry
- Attendants are certified

- Employees have the required personal protective equipment
- Employees have been briefed in the hazards associated with this specific entry

c. The supervisor shall notify the Safety Coordinator, or equivalent, that the confined space is ready for testing and that all sections of the entry tag are complete.

d. The testing of atmospheric condition shall be in accordance with paragraph 5 of section IV.

e. A tag shall be attached to the exterior of the confined space; this tag shall authorize those individuals entering, the attendant, the supervisor and parameters of the work involved.

4. Safety and Operational Equipment

a. Atmospheric Testing

Atmospheric test equipment shall be capable of monitoring oxygen, combustible gases and toxic gases or vapors. The monitoring equipment shall meet the following criteria and be calibrated prior to use

- Continuous
- Instantaneous
- Percent Oxygen
- Percent LEL of combustible
- PPM or equivalent of toxic gas or vapors
- Extendible to areas outside the confined space

b. Ventilation

Ventilation equipment shall be used as intended. Equipment shall be intrinsically safe in combustible atmosphere. All air handling equipment must be bonded and grounded.

c. Communication Equipment

Communication equipment used in confined spaces between the entrants and the attendant shall be radios, 2-way phones or alarming equipment. All communication equipment shall be intrinsically safe.

d. Personal Protective Equipment

Personal protective equipment (PPE) shall be provided by and maintained by the employer. This equipment will be provided at no cost to the employee.

As a minimum, the following PPE will be issued and used when working in a permit required confined space:

- Hardhats
- Safety glasses
- Body harness
- Extrication equipment

As required when engineering controls cannot eliminate or reduce airborne contaminates to a safe level. Respirators shall be provided. Respirator selection, use, maintenance and training shall be accomplished in accordance with Section 5 of this manual.

Under no circumstances are employees permitted to enter a confined Space in which oxygen level exceeds 23.5%, or has a flammable atmosphere.

e. Lighting Equipment

Temporary lighting in confined spaces shall be either 12V DC or 120V AC when connected to a GFCI. When there is a potential for combustible atmosphere only 12V DC equipment shall be used.

f. Barriers and Shields

Where there is a potential of employees falling into a confined space or a potential of foreign objects entering the space a temporary barrier shall be provided.

5. Procedure for Evaluating Permit Space Conditions

a. Criteria for Atmospheric Testing

1) Oxygen - 19.5 to 23.0%

2) Combustibles - Less than 10% LEL

3) Toxic gases/vapors - any measurement less than the permissible exposure level as defined in OSHA 29 CFR 1910.1000, Subpart Z.

b. During the period of time in which the permit is valid, continuous monitoring shall be accomplished based on the existence of or potential for a hazardous condition. In some cases, monitors, may be in operation with the entrants to warn of changing conditions.

c. All initial atmospheric testing shall be accomplished from outside the confined space using extension probes.

6. Training

Training shall be in accordance with Section V paragraph A.

7. Designation of Personnel

Each permit required confined space shall have the responsible persons identified by name on the permit, i.e.:

- Supervisor
- Authorized entrants
- Attendants
- Person performing atmospheric tests

8. Emergency Response

Emergency response procedures developed as required by this paragraph shall identify the emergency procedures in effect for confined spaces. This procedure shall be part of the training program outlined in paragraph IV of this section.

9. Procedure for Activating a Permit

a. The supervisor responsible for performing the work shall initiate the permit. Sample permits are found in Appendix C or Form D.

b. The supervisor and entrants shall ensure that all mechanical and electrical systems have been locked, blocked, blinded and tagged out of service.

c. Upon initial atmospheric testing, mechanical ventilation may be required to purge the confined space.

d. Atmospheric testing shall be accomplished by the Safety Coordinator or other competent persons trained in the use of testing equipment.

e. The permit must be completed in full and signed by the supervisor and person performing the atmospheric test.

f. Permits are valid for one shift only, and only for the work and entrants listed on the permit.

g. Permits are void when conditions or operations change inside the confined space, or, when an upset condition exists outside the confined space which has the potential of changing the inside conditions.

10. Multi-Employer Work Projects

In accordance with OSHA 1910.146, employers are responsible for establishing a Confined Space Program. On multi-employer projects, a project procedure will be implemented to coordinate this effort.

11. Procedure for Closing Off a Confined Space

Upon completion of work, the supervisor responsible for the work shall ensure the permit is returned to safety and all block, blinds, electrical locks and tags have been removed.

12. Monitor Procedures for Confined Space

The project competent person shall periodically monitor the procedures for confined spaces to ensure validity. In cases where procedures have been violated by accident or cause, the Safety Coordinator and Department Manager shall jointly investigate the incident. Permits shall be kept on file for a period of one year.

V. TRAINING

A. Each employee assigned to work in a confined space or act as the attendant shall receive a certification that they have successfully completed a comprehensive Training Program. The Training Program as a minimum will cover the following topics:

1. Definitions of a Confined Space
2. Hazardous Materials, Vapors and Gases
3. Atmospheric Monitoring Equipment
4. Ventilation - Local and General
5. Duties
   a. Supervisor
   b. Entrant
   c. Attendant
6. Personal Protective Equipment and Use
   a. Safety Harness
   b. Extrication Equipment
7. Standardized Emergency Procedures. Training will be provided:
   a. Prior to assigned duties
   b. Prior to a change in assigned duties
   c. Whenever there is a change in permit space operations that present a hazard for which the employee has not been trained.
   d. Whenever there is a reason to believe the employee is not proficient in their duties, or inadequacies in the program

B. Attachment A of this section outlines the training guide to be used. This program must include Project specific procedures not included in this guide. Upon successful

completion of this training program (80% proficiency on test) the employee will be issued a card signifying successful completion.

In addition to the training required by this section, employees must also successfully complete all parts of the H-E-B Hazard Communication Program. If respirators are to be used, those employees affected must complete training as required in Section 27 of this manual.

VI. EMERGENCY RESCUE AND RESPONSE

A. Each member assigned to the emergency rescue team must be trained in accordance to paragraph VI of this section.

B. Each member assigned to the emergency rescue team shall be trained in the use of the personal protective equipment to be used.

C. Each member of the emergency rescue team shall receive simulated training in confined space extrication by use of dummies, mannequins, or real personnel. This training must use spaces which are representative of those requiring permits. These practice sessions shall be held at least annually.

D. Each member of the rescue team shall be trained in basic first aid and CPR.

E. At least one member certified in first aid and CPR shall be available at all times permit space operations are taking place.

F. When outside rescue services are used to meet the requirements of this section, they must be provided:

1. The hazards which may be encountered
2. Access to all permitted confined spaces so that appropriate rescue plans can be developed.

VII. CONFINED SPACE CLASSIFICATIONS

A. Class I

Confined space where an atmosphere with dangerous air contamination, oxygen deficiency, or oxygen enrichment is unlikely to develop.

B. Class II

Confined space where an atmosphere free of dangerous air contamination, oxygen deficiency, or oxygen enrichment has been verified.

C. Class III

Confined space where an atmosphere is free of dangerous contamination, oxygen deficiency, or oxygen enrichment cannot be verified.

For the purpose of this procedure and that of consistency COVENANT SERVICES will perform confined space entry in accordance with this procedure and treat all entries as Class III.

Attachment A

PERMIT REQUIRED CONFINED SPACE TRAINING GUIDE

I. PURPOSE

Each person assigned to a confined space entry team must be certified in the duties which must be performed. This training syllabus has been developed to ensure that training throughout COVENANT SERVICES meets both the intent of the law and that programs remain consistent from project to project.

II. TRAINING FACILITATOR

Facilitators performing the training must be competent either through education or experience in Permit Required Confined Space Entry. Training facilitators must have thorough knowledge of confined spaces, hazard associated with toxic atmospheres, monitoring equipment, personal protective equipment, and emergency rescue planning. In addition, facilitators must know blinding and purging, lockout/tagout, ventilation, and toxicological effects.

III. PROGRAM GUIDE

A. WHAT IS REQUIRED?

1. This training program is being provided to each employee involved in confined space entry. The program provides compliance with OSHA 1910.146.

2. Training will be provided:
   a) Before an employee is assigned duties of PRCS.
   b) Before there is a change in these assigned duties.
   c) Whenever there is a change in operations which may present different hazards not previously discussed.
   d) Whenever COVENANT SERVICES believes that the programs and procedures concerning Confined Space Entry are inadequate for the hazards.

3. Each employee will participate in all sections of this program. Upon successful completion of this program a certificate will be issued. This certificate will be good for one year. A copy will be filed on the project. This card must be kept on the person for verification prior to any entry.

B. DEFINITIONS APPLICABLE TO CONFINED SPACES

Confined Space - A space that is:

Large enough and so configured that an employee can bodily enter and perform assigned work; and

Limited or restricted means of entry or exit; and

Not designed for conditions employee occupancy

Permit Required Confined Space - A Confined Space that has one or more of the following characteristics:

Contains or has the potential to contain a hazardous atmosphere.

Contains a material that has the potential for engulfing an entrant.

Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section.

Contains any other recognized serious safety or health hazard.

Entrant - Any person authorized to enter a Permit Required Confined Space.

Attendant - Any person authorized to stay outside of a confined space to maintain contact to those within.

Emergency Rescue Plan - A written program which established emergency procedures to follow during an emergency.

C. HAZARDOUS MATERIALS, VAPOR AND GASES

Oxygen -

- An oxygen level of 20.9% is considered normal regardless of elevation, temperature or humidity.
- A level of 16.5% is sufficient to sustain life.
- A level of 23.5% is considered oxygen rich and must be considered dangerous.

a) When monitoring oxygen levels in confined spaces, this level must be maintained between 19.5% and 21.5%, The ±5% of normal allows for fluctuations in equipment and sensors. Any reading outside of this parameter must be investigated to ascertain the reason for the potential hazard, i.e., leaks in valves/blinds. Spaces, which have oxygen below 19.5 or above 21.5%, must be ventilated and rechecked before entry.

Combustible - Confined Spaces are monitored for their % concentration of a lower explosive limit. Combustible vapor and gases have a lower and upper explosive limit. This is depicted on a Material

Safety Data Sheet as a percent, i.e., 4 to 40%. This is the range in which a gas or vapor can ignite if there is an ignition source such as a spark, flame, even static electricity.

a) The confined space is monitored for the percent of the lower explosive limit. Equipment normally alarms at 20% of the lower explosive limit. If the confined space exceeds 10% of the lower explosive limit, the source of the gas or vapor should be found and blocked prior to entry. Ventilation must be accomplished with intrinsically safe fans/blowers.

1. Toxic Atmospheres - There are numerous toxic materials, gas, and vapors. Some of these gases and vapors can be monitored on a direct reading instrument such as Carbon Monoxide, Hydrogen Sulfide, and Sulfur Dioxide. OSHA has specific Permissible Exposure Limits (PEL) established for these chemicals. Entry into space in which atmospheric concentrations are in excess of the PEL is prohibited. Locate and block the source of the contaminant and ventilate the space prior to entry.

a) This project may have confined spaces which contain these toxic chemicals.

D. ATMOSPHERIC MONITORING EQUIPMENT

(Note: The instruments to be used must be available during this section).

1. Present the instrument's capabilities and limitations.
2. Discuss the alarms.
3. Discuss what to do when alarm sounds.

E. VENTILATION

1. Local - Local ventilation is required when a toxic material is applied, cut burned, or welded. This ventilation normally provides suction near the point of operation and discharges the air into the atmosphere outside the space and away from Heating Ventilation Air Conditioning (HVAC) intakes and other working employees.
2. General - General ventilation can be suction, supplied or both. General ventilation provides clean air to the space at a pre-established rate.
3. Hazards - When various materials must be applied as a coating, cleaner, etc. The air inside a confined space can become potentially dangerous. Material Safety Data Sheets must be reviewed. These materials must be noted on the Confined Space Entry Permit.

F. RESPONSIBILITIES

1. Supervisor - The Entry Supervisor is responsible for:
   - a) Knowing the hazards which may be encountered during entry, including the mode, signs and symptoms of exposure.
   - b) Verifying that a permit is complete and that all tests are complete, systems are safe, and procedures and equipment are in place before allowing entry.
   - c) Terminates the entry when work is complete, cancels the permit, and returns it to safety.
   - d) Verifies that rescue services are available and the means to summon them are operational.
   - e) Remove unauthorized personnel who enter or attempt to enter the space.
   - f) Ensures that procedures for entry and work operations are conducted in accordance with the entry procedure and permit requirements.
2. Entr nt - Each entrant must know the following:
   - a) The hazards which may be encountered including the mode, signs, symptoms and consequence of exposure.
   - b) Proper use of all equipment used in the permit space.
   - c) Communicate with the attendant as necessary to enable the attendant to monitor conditions and
   - d) Alert the attendant whenever:
     1) They recognize warning signs or symptoms of exposure to a hazard.
     2) They recognize a prohibited condition.
   - e) Exit from the space quickly, whenever:
     1) An order to evacuate is given by the attendant or entry supervisor.
     2) They recognize signs or symptoms of exposure to a dangerous situation.
     3) They recognize a prohibited condition.
     4) An evacuation alarm is activated.
3. Attendant - Each attendant is responsible for:
   - a) Knowing the hazards faced during entry, including the mode, signs, symptoms and consequences of exposure.
   - b) Aware of possible behavioral effects of hazard exposure in authorized entrants.
   - c) Continuously maintain an accurate count of authorized entrants, and to identify those listed as authorized on the permit.
   - d) Remain outside the permit space until relieved by another attendant
   - e) Communicate with authorized entrants as necessary to monitor entrant

status and to alert entrant of the need to evacuate.

f) Monitor activities inside and outside the space to determine if it is safe for entrants to remain inside and to order an immediate evacuation under any of the following conditions:

1) Detection of a prohibited condition,
2) Detects behavioral effects of hazard exposure in an authorized entrant,
3) If the attendant detects a situation outside the space which could endanger the entrants,
4) If the attendant cannot effectively and safety perform the duties of the attendant.

h) Summon rescue and other emergency services as soon as the attendant determines the entrants need assistance in escaping from permit space hazards.

i) Take the following actions when unauthorized persons approach or enter a permit space when entry is underway.

1) Warn person to stay from the permit space.
2) Advise the persons they must exit immediately if they have entered the permit space.
3) Inform the authorized entrants and entry supervisor that unauthorized persons have entered the permit space.

j) Perform non-entry rescues as specified on the emergency action plan, such as winching entrants out with entry tripod.

k) Perform no other duties which may interfere with the attendants primary duty of monitoring and protecting the authorized entrants. ***NOTE****:* It is imperative that the toxicological effects of permit space hazards be discussed prior to the responsibilities section. At the facilitators discretion the Right-to-Know training can be inserted prior to Section F "Responsibility".

G. PERSONAL PROTECTIVE EQUIPMENT (PPE)

1) Mandatory Personal Protective Equipment in confined spaces are:
   a) Hard hat
   b) Eye protection
   c) Safety body belt
   d) Extrication equipment

2) At this point the facilitator shall ensure that all persons being certified are competent in the use, application, and maintenance of the Personal Protective Equipment listed above in G.1

3) Based upon the known or potential hazards, additional Personal Protective

Equipment such as:

a) Protective gloves
b) Protective clothing
c) Face protection
d) Respiratory protection may be required. See Risk Management.

H. STANDARDIZED EMERGENCY PROCEDURES

1) Emergency procedures must be developed specifically for each project. These procedures must be provided to, and reviewed during this section of the training program.

2) Based on class size, need, and time, the facilitator should separate the class into groups and practice a mock entry to a confined space. Each mock case study should have different hazards and conditions. Each group should complete a form identifying a safe entry. Each group should discuss with the other groups their case.

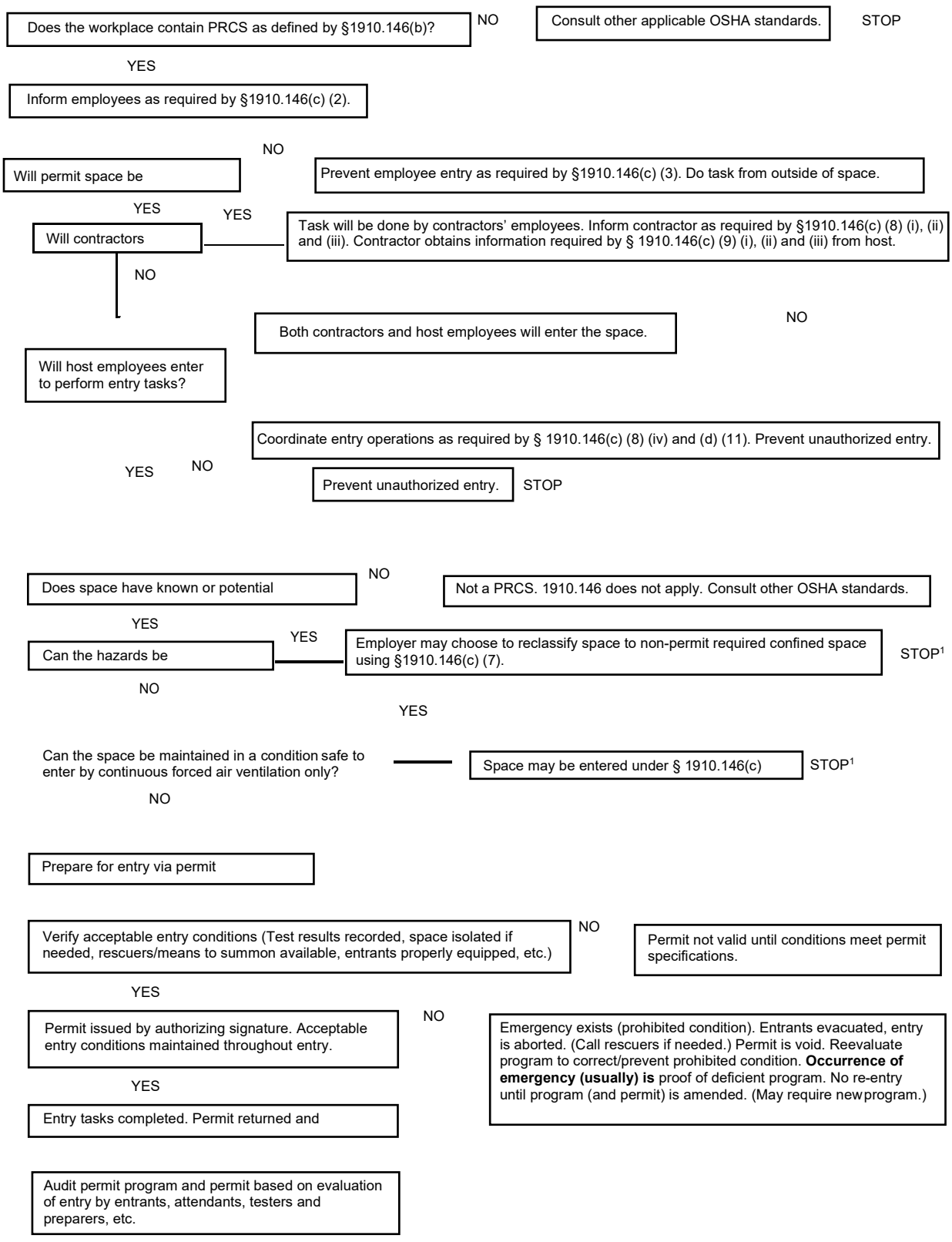
APPENDIX A

CONFINED SPACE INVENTORY REPORT

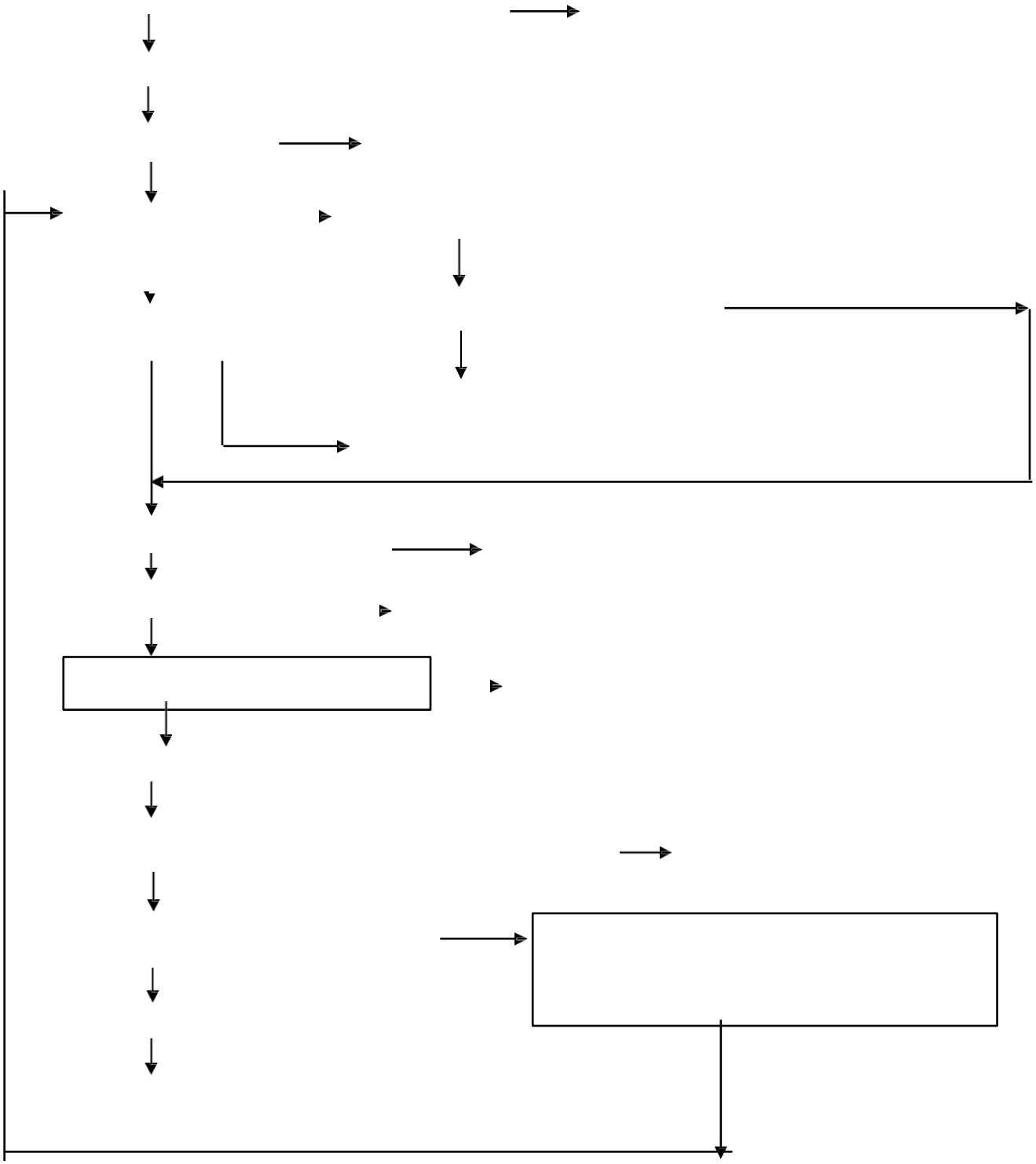
SPECIFIC LOCATION	Permit-Required Confined Space		TESTING REQUIRED		ENTRANTS IDENTIFIED		TRAINING PROVIDED		AREA SUPV.
	YES*	NO	YES	NO	YES	NO	YES	NO	

Appendix B

Permit - Required Confined Space Decision Flow Chart



*Spaces may have to be evacuated and re-evaluated if hazards arise during entry



Appendix C

CONFINED SPACE ENTRY CHECKLIST / PERMIT

Employee Name(s): _____

_____

Jobsite / Location: _____

_____

Emergency Telephone #: _____

Do <u>not</u> enter a confined space until you have considered every question, and have determined the space to be safe.

YES	NO	
( )	( )	Is entry necessary?
		<u>TESTING</u>
( )	( )	Are the instruments used in atmospheric testing properly calibrated? (
)	( )	Was the atmosphere in the confined space tested?
( )	( )	Was Oxygen at least 19.% - not more than 21%?
( )	( )	Were toxic, flammable, or oxygen-displacing gases/vapor present?
		<u>MONITORING</u>
( )	( )	Will the atmosphere in the space be monitored while work is going on?
( )	( )	Continuously?
( )	( )	Periodically? (If yes, give interval:_____) *(remember – atmospheric changes occur due to the work procedure or the product stored. The atmosphere may be safe when you enter, but can change very quickly).*
		<u>CLEANING</u>
( )	( )	Has the space been cleaned before entry is made?
( )	( )	Was the space steamed?
( )	( )	If so, was it allowed to cool?
		<u>VENTILATION</u>
( )	( )	Has the space been ventilated before entry?
( )	( )	Will ventilation be continued during entry?
( )	( )	Is the air intake for the ventilation system located in an area that is free of combustible dust and vapors and toxic substances?
( )	( )	If atmosphere was found unacceptable and then ventilated, was it re-tested before entry?
		<u>ISOLATION</u>
( )	( )	Has the space been isolated from other systems?
( )	( )	Has electrical equipment been lockedout?
( )	( )	Have disconnects been used wherepossible?
( )	( )	Has mechanical equipment been blocked, chocked and disengaged where necessary? (
)	( )	Have lines under pressure been blanked andbled?

CLOTHING/EQUIPMENT

( ) YES ( ) NO Is special clothing required (boots, chemical suits, glasses, etc.)?

If so specify:

_____

( ) ( ) Special equipment required (e.g., rescue equipment, communications, equipment, etc.)?
If so specify:

_____

( ) ( ) Are special tools required (e.g., sparkproof)?
If so specify:

_____

RESPIRATORY PROTECTION

( ) ( ) Are MSHA/NIOSH – approved respirators of the type required available at the worksite?
( ) ( ) Is respiratory protection required (e.g., air purifying, supplied air, self-contained breathing apparatus, etc)?
If so specify:

_____
_____
_____

( ) ( ) Can you get through the opening with a respirator on? (If you don't know, find out before you try to enter)

TRAINING

( ) ( ) Have you been trained in proper use of a respirator?
( ) ( ) Have you received first aid/CPR training?
( ) ( ) Have you been trained in confined space entry and do you know what to look for?

STANDBY/RESCUE

( ) ( ) Will there be a standby person on the outside in constant visual or auditory communication with the person on the inside?
( ) ( ) Will the standby person be able to see and/or hear the person inside at all times?
( ) ( ) Has the standby person(s) been trained in rescue procedures?
( ) ( ) Will safety lines and harness be required to remove a person?
( ) ( ) Are company rescue procedures available to be followed in the event of an emergency?
( ) ( ) Are your familiar with emergency rescue procedures?
( ) ( ) Do you know who to notify and how in the event of an emergency?

PERMIT

(The permit is an authorization in writing that states that the space has been tested by a qualified person, that the space is safe for entry; what precautions, equipment, etc. are required; and what work is to be done.)

( ) ( ) Has a confined space entry permit been issued?

( ) ( ) Does the permit include a list of emergency telephone numbers?

Date of entry: _____ Permit Expires: _____

Competent Persons Signature: _____

Competent Persons Name Printed: _____

Permit must be signed and expires within 8 hours of issue. Periodic checks may be necessary if conditions change.

FORMS

The forms in this section are provided for your use in administering your confined space entry program. You may copy and alter these forms to suit your location's particular needs.

You may want to review applicable regulations before using any form for documentation purposes.

The forms provided are:

FORM A	Confined Space Entry Log (Documents all entry permit issues)
FORM B	Confined Space Entry Checklist (For use in preparation of entry)
FORM C	Confined Space Hazard Evaluation (Documents hazards prior to permit)
FORM D	Confined Space Entry Permit
FORM E	Confined Space Entry Equipment List
FORM F	Confined Space Entry Emergency Information List Non-Entry Rescue Entry Rescue by Employees Entry Rescue by Non-Employees
FORM G	Confined Space Post-Entry Evaluation
FORM H	Confined Space Entry Training Record
FORM I	Confined Space Entry Post-Training Exam

FORM A

CONFINED SPACE ENTRY LOG

Instructions

1. Log each permit issued for confined space entry. Indicate date and time of the entry. This form must be initialed (each time) by the person issuing the permit.
2. When entry is complete, note that the permit has been canceled. Indicate date and time of project completion. The form must be initialed by the person canceling the permit.
3. At least annually, review the permits issued to assess the adequacy of the permit system. Date and initial when complete.

PERMIT NUMBER	CONFINED SPACE NAME	PERMIT ISSUED			PERMIT CANCELED			ANNUAL REVIEW	
		DATE	TIME	INITIALS	DATE	TIME	INITIALS	DATE	INITIALS

FORM B

CONFINED SPACE ENTRY CHECKLIST

1. Evaluate the job.

Identify the work to be performed	Initials	Date
Identify who will perform the work	Initials	Date
Determine when the work will be performed	Initials	Date
Determine the types of hazards associated with the space	Initials	Date
Prepare for entry by completing the confined space entry permit	Initials	Date

2. Brief the team.

Review the permit requirements	Initials	Date
Verify rescue methods to be used and procedures to be followed	Initials	Date
Confirm that rescue personnel are available	Initials	Date
Review the communication procedures to be used	Initials	Date

3. Isolate the space.

Initiate appropriate lockout and tagout	Initials	Date
Clean and/or purge the space	Initials	Date
Ventilate the space	Initials	Date
Verify atmospheric conditions according to permit	Initials	Date

4. Perform the work.

	Initials	Date
	Initials	Date
	Initials	Date
	Initials	Date

5. Conclude the entry and debrief the team.

Exit the space and account for all entrants	Initials	Date
Cancel the permit	Initials	Date
Provide appropriate maintenance to equipment	Initials	Date
Evaluate the entry for problems or opportunities for improvement	Initials	Date

FORM C

CONFINED SPACE HAZARD EVALUATION

			Hazards							
Space #	Confined Space	Location	Low Oxygen Level (less than 19.5%)	High Oxygen Level (more than 23.5%)	Flammable gas or vapor (greater than 10% LFL)	Toxic Material (level above PEL) *Specify*	Config-uration	Engulf-ment	Mech-anical	Elec-trical

FORM D

CONFINED SPACE ENTRY PERMIT

Space Name: Entry No. _____

Purpose: Permit Expires: _____

Entry Date(s): _____ Entry Time(s): _____ Rescue Information: _____

Attendant: _____ Entrants: _____ Telephone No.: _____

Check where provided

HAZARD IDENTIFICATION	Yes	No	EQUIPMENT (SPECIFY)	REQUIRED Yes	No	HAZARD CONTROLS (SPECIFY)	REQUIRED Yes	No
Oxygen deficiency (less than 19.5% at sea level)	⑧	⑧	1. Respiration Protection	⑧	⑧	1. Isolate the space	⑧	⑧
Flammable gases or vapors (greater than 10% of the lower flammable limit or greater than 23.5% oxygen at sea level)	⑧	⑧	2. Protective Clothing or Equipment	⑧	⑧	2. Lockout	⑧	⑧
Toxic gases or vapors	⑧	⑧	3. Communication Equipment	⑧	⑧	3. Clean/Purge	⑧	⑧
Mechanical hazards	⑧	⑧	4. Rescue Equipment	⑧	⑧	4. Rescue Equipment	⑧	⑧
Electrical shock	⑧	⑧	5. Ventilation	⑧	⑧	5. Ventilation	⑧	⑧
Materials harmful to the skin	⑧	⑧	6. Electrical Equipment	⑧	⑧	6. Other	⑧	⑧
Engulfment	⑧	⑧						
Configuration	⑧	⑧						

Air Monitoring Results. Air monitoring equipment used.

		Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM
Oxygen Level min	19.5%								
max	23.5%								
Flammability	10% LFL								

H_2S	10 ppm								
CO	25 ppm								
SO_2	2 ppm								
Other (specify)									

Authorization of Entry Supervisor Permits

Name	**Date**	**Phone**	**Additional Instructions?**	**Additional Permits**
			Yes ⑨ **No** ⑨ *If yes, list below*	**Yes** ⑨ **No** ⑨ *If yes, list below*

FORM E

CONFINED SPACE ENTRY EQUIPMENT LIST

Instructions: List all available equipment to be used for confined space entries, where it is stored and who is responsible for the equipment. The responsible person will be contacted to obtain the equipment as the entry team prepares for entry. In addition, this person will be responsible for inventory, maintenance and calibration of the equipment as necessary.

Entry Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Communication Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Emergency Retrieval Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Air Monitoring Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

FORM F

CONFINED SPACE ENTRY EMERGENCY INFORMATION

Instructions:

1. Determine how entrants will be rescued:
   - Non-Entry Rescue
   - Entry Rescue by Non-Employees
   - Entry rescue by Employees

2. Verify responsibilities with all designated responders. If outside responders are used, verify that they have equipment and training to respond to emergencies at your facility.

3. Attach a copy of the Emergency Information (see next page) to all confined space entry permits issued.

Non-Entry Rescue Procedure

1. Never enter a confined space to perform a rescue unless trained to do so. The attendant will prevent untrained and unauthorized personnel from entering the space.
2. Sound local alarm to alert employees of emergency (i.e., shout for help, contact security, etc.)
3. Assess the emergency. Determine the type of injury to the entrant.
4. Verify that retrieving the employee will not result in inflicting additional injury to him or her.
5. Retrieve injured employee using the rescue equipment listed below.
6. Administer First Aid/CPR as necessary. Contact outside emergency responders (911) as necessary.
7. Terminate the confined space entry until the reasons for the emergency have been identified and corrected.
8. Complete company accident investigation reports and workers' compensation reports for any injured employees.

Entry Rescue Procedure

1. Never enter a confined space to perform a rescue unless trained to do so. The attendant will prevent untrained and unauthorized personnel from entering the space.
2. Sound local alarm to alert employees of emergency (i.e., shout for help, contact security, etc.)
3. Assess the emergency. Determine the type of injury to the entrant.
4. Contact emergency responders and key company employees in order of appearance on the call list.
5. Delegate an employee to guide the emergency responders to the site.
6. Assist emergency responders as needed to facilitate the rescue.
7. Administer First Aid/CPR as necessary.
8. Terminate the confined space entry until the reasons for the emergency have been identified and corrected.
9. Complete the company accident investigation reports and workers' compensation reports for any injured employees.

Emergency Call List

	Name	Telephone Numbers			
1.		Work #	Home #	Pager #	Cellular #
2.		Work #	Home #	Pager #	Cellular #
3.		Work #	Home #	Pager #	Cellular #
4.		Work	Home	Pager #	Cellular

_____ # _____ # _____ _____ # _____

Other designated Emergency Responders

Local Fire Department, Mutual Aid Team, etc.	**Phone #**

FORM G

CONFINED SPACE POST-ENTRY EVALUATION

Entry Date_____ Job Number _____

Job Description _____

What went well? _____

What needs improvement? _____

FORM H

CONFINED SPACE ENTRY — TRAINING RECORD

Company Name: _____ Location:

Instructor: _____ Training Date:

	ATTENDING EMPLOYEES	DEPARTMENT	JOB TITLE
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			

FORM I

CONFINED SPACE ENTRY —POST-TRAINING EXAM

PERMIT-REQUIRED CONFINED SPACEQUIZ

1. A confined space may contain such hazards as hazardous atmosphere, the potential for engulfment and/or entrapment, and mechanical hazards.	True ⑨	False ⑨
2. Confined spaces marked with a warning sign may be entered by employees with more than five years of experience without regard to hazard.	True ⑨	False ⑨
3. You may enter a confined space for an unlimited amount of time.	True ⑨	False ⑨
4. Attendants, entrants, supervisors, and rescue personal must be provided specific training with regard to their duties and the hazards they may encounter.	True ⑨	False ⑨
5. Non-entry rescue is usually conducted with a life line and without the need for employees to enter the confined space.	True ⑨	False ⑨
6. If you experience any symptoms such as dizziness, breathing difficulty, etc., you should immediately exit the confined space and alert your supervisor.	True ⑨	False ⑨
7. If you observe an employee who appears to be unconscious inside a confined space, you should enter and attempt rescue without regard to your own safety.	True ⑨	False ⑨
8. An employers must conduct a survey of the confined spaces in its workplace and identify those spaces so that workers will not enter them.	True ⑨	False ⑨
9. If there is the possibility that a confined space contains a hazardous atmosphere, it must be tested to determine if it is safe to enter.	True ⑨	False ⑨
10. One of the duties of an attendant is to stand outside a confined space and monitor the entrants as well as keep unauthorized people from entering.	True ⑨	False ⑨
11. Disregard for the hazards in a confined space can result in injury not only to yourself, but other employees as well.	True ⑨	False ⑨

Answers to “Permit-Required Confined Space” Quiz

1. True

2. False

3. False

4. True

5. True

6. True

7. False

8. True

9. True

10. True

11. True

Depending upon your operations, the hazards involved and the situations that your employees will encounter, you will need to customize this quiz to meet your needs and the learning needs of your employees.

I. PURPOSE

This procedure applies to all COVENANT SERVICES locations when performing operations which meet the definition of a
Permit Required Confined Space as per the requirements of 29 CFR OSHA 1910.146.

A. The Plant Manager/Site Supervisor is responsible to coordinate in conjunction with the Safety Coordinator the provisions of this program.

B. The Plant Manager/Site Supervisor is responsible to assure that no employee is assigned to a task within a confined space until the provisions of this program have been met.

III. INTRODUCTION

It is the policy of H-E-B to communicate and enforce the requirements of the Confined Space Entry Procedure for all activities requiring the implementation of its provisions for all persons of COVENANT SERVICES, contractor employers and other visitors.

Should other Confined Space Entry Procedures be already established on a site, the Safety Coordinator will review these procedures to determine compliance with applicable state and federal regulations and make the determination whether COVENANT SERVICES employees will follow this Procedure or the established procedure already in place on the site.

This policy covers minimum performance standards applicable to all COVENANT SERVICES employees and locations. Local practices requiring more detailed or stringent rules or local, state or other federal requirements regarding this subject can and should be added as an addendum to this procedure as applicable.

III. DEFINITIONS

Acceptable entry conditions	The conditions that must exist in a permit space to allow entry and to ensure that employees involved in a permit-required confined space entry can safely enter into and work within the space.
Attendant	An individual stationed outside one or more permit spaces who monitors the authorized entrants and who performs all attendant's duties assigned in the employer's permit space program.
Authorized entrant	An employee who is authorized by the employer to enter a permit space.
Blanking or blinding	The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the

	pipe, line, or duct with no leakage beyond the plate.
Confined space	A space large enough and so configured that an employee can bodily enter and perform assigned work; and has limited or restricted means for entry

	or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry); and is not designed for continuous employee occupancy.
Double block and bleed	The closure of a line, duct, or pipe by closing and locking or tagging two in-line valves and by opening and locking or tagging a drain or vent valve in the line between the two closed valves.
Emergency	Any occurrence (including any failure of hazard control or monitoring equipment) or event internal or external to the permit space that could endanger entrants.
Engulfment	The surrounding and effective capture of a person by a liquid or finely divided (flowable) solid substance that can be aspirated to cause death by filling or plugging the respiratory system or that can exert enough force on the body to cause death by strangulation, constriction, or crushing.
Entry	The action by which a person passes through an opening into a permit-required confined space. "Entry" includes all work activities in that space and is considered to have occurred as soon as any part of the entrant's body breaks the plane of an opening into the space.
Entry permit (permit)	The written or printed document that is provided by the employer to allow and control entry into a permit-required space.
Entry supervisor	The person (such as the employer, foreman, or crew chief) responsible for determining if acceptable entry conditions are present at a permit space where entry is planned, for authorizing entry and overseeing entry operations, and for terminating entry.
Hazardous atmosphere	An atmosphere that may expose employees to the risk of death, incapacitation, impairment of ability to self-rescue (that is, escape unaided from a permit space), injury, or acute illness.
Hot work permit	The employer's written authorization to perform operations (for example, riveting, welding, cutting, burning, and heating) capable of providing a source of ignition.
Immediately dangerous to life or health (IDLH)	Any condition that poses an immediate or delayed threat to life or that would cause irreversible adverse health effects or that would interfere with an individual's ability to escape unaided from a permit space.
Inerting	The displacement of the atmosphere in a permit space by a noncombustible gas (such as nitrogen) to such an extent that the resulting atmosphere is noncombustible.
Isolation	The process by which a permit space is removed from service and completely protected against the release of energy and material into the space.
Non-permit confined space	A confined space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm.

Oxygen deficient atmosphere	An atmosphere containing less than 19.5 percent oxygen by volume.
Oxygen enriched atmosphere	An atmosphere containing more than 23.5 percent oxygen by volume.
Permit-required confined space (permit space)	A confined space that has one or more of the following characteristics: contains or has a potential to contain a hazardous atmosphere; contains a material that has the potential for engulfing an entrant; has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or contains any other recognized serious safety or health hazard.
Permit-required confined space program (permit space program)	The employer's overall program for controlling and, where appropriate, for protecting employees from, permit space hazards and for regulating employee entry into permit spaces.
Permit system	The employer's written procedure for preparing and issuing permits for entry and for returning the permit space to service following termination of entry.
Prohibited condition	Any condition in a permit space that is not allowed by the permit during the period when entry is authorized.
Rescue service	The personnel designated to rescue employees from permit spaces.
Retrieval system	The equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from permit spaces.

IV. APPLICATION/IMPLEMENTATION

A. Evaluating Confined Spaces

1. H-E-B shall evaluate the workplace to determine if any spaces are permit-required confined spaces. See Appendix A.

2. If permit-required confined spaces are identified, entry is permitted only under these conditions:

   a. The only hazard is an actual or potential atmosphere,

   b. Continuous forced air ventilation alone is sufficient to maintain that permit space safe for entry, and

   c. Monitoring and inspection data supports the decision, or

d. To perform initial entry to obtain the data required.

The data collected through paragraphs a-c must be made available to the employee who must enter this space.

3 In order to enter a permit required confined space without developing a written program, instituting a permit system, completing a permit training of entrants, attendants and supervisors, and developing an emergency rescue procedure, all of the following conditions must be met:

a. Any unsafe condition is corrected before removing the cover to the entrance.

b. Entrances are protected to prevent injury of those in the space from objects entering the space.

c. Internal atmosphere is checked with direct reading instruments for the following conditions:

1) Oxygen content
2) Flammable gas or vapors
3) Toxic air contaminants

d. Continuous forced air ventilation is used:

1) Directed as to ventilate the immediate areas where employees will be.
2) Air supply must be from a clean source.

e. The atmosphere within the space is periodically tested.

f. If a hazardous atmosphere is detected, all persons shall immediately leave.

B. Permit Required Confined Space Program

Per OSHA 29 CFR 1910.146, employers are to have in effect a Permit Required Confined Space Written program. This section meets the requirements of the law, only after paragraphs B.2, B.3, B.8, and B.10 of the standard have been completed.

1. Project Survey

Prior to commencement of work the H-E-B Plant Manager/Site Supervisor, Safety Coordinator shall survey the selected work areas and applicable scope of work with respect to possible confined space work activities. Use the Permit Required Confined Space Decision Flow Chart to determine if a particular space is defined as a Permit Required Confined Space. Appendix B.

Based on this survey, if permit required confined space entry will be required

signs barring the words "Danger - Permit Required Confined Space, Do Not Enter" shall be affixed and readily recognizable to the entrance. Employees shall be notified during the new hire orientation and reaffirmed during subsequent weekly safety meeting of the meaning and hazards associated with these spaces.

2. Hazard Evaluation

H-E-B shall determine the hazards associated with the confined space. If such information is not available, or, is insufficient, the H-E-B Safety Coordinator shall perform a hazard assessment of the confined spaces. This information shall be put in text and shall be part of the training program outlined in 1910.146 paragraph B.6 of this section.

3. Procedures for Safe Entry

a. The supervisor responsible for performing the entry work shall be responsible for assuring all connected systems to the confined space are:

- Disconnected and blinded
- Locked and tagged
- Ventilated
- Under no conditions are tags to be used as a sole safe provision on systems which have potential to cause death or serious injury
- Written procedures must be developed for performing these activities

b. The supervisor shall also ensure that:

- Employees have been certified in confined space entry
- Attendants are certified

- Employees have the required personal protective equipment
- Employees have been briefed in the hazards associated with this specific entry

c. The supervisor shall notify the Safety Coordinator, or equivalent, that the confined space is ready for testing and that all sections of the entry tag are complete.

d. The testing of atmospheric condition shall be in accordance with paragraph 5 of section IV.

e. A tag shall be attached to the exterior of the confined space; this tag shall authorize those individuals entering, the attendant, the supervisor and parameters of the work involved.

4. Safety and Operational Equipment

a. Atmospheric Testing

Atmospheric test equipment shall be capable of monitoring oxygen, combustible gases and toxic gases or vapors. The monitoring equipment shall meet the following criteria and be calibrated prior to use

- Continuous
- Instantaneous
- Percent Oxygen
- Percent LEL of combustible
- PPM or equivalent of toxic gas or vapors
- Extendible to areas outside the confined space

b. Ventilation

Ventilation equipment shall be used as intended. Equipment shall be intrinsically safe in combustible atmosphere. All air handling equipment must be bonded and grounded.

c. Communication Equipment

Communication equipment used in confined spaces between the entrants and the attendant shall be radios, 2-way phones or alarming equipment. All communication equipment shall be intrinsically safe.

d. Personal Protective Equipment

Personal protective equipment (PPE) shall be provided by and maintained by the employer. This equipment will be provided at no cost to the employee.

As a minimum, the following PPE will be issued and used when working in a permit required confined space:

- Hardhats
- Safety glasses
- Body harness
- Extrication equipment

As required when engineering controls cannot eliminate or reduce airborne contaminates to a safe level. Respirators shall be provided. Respirator selection, use, maintenance and training shall be accomplished in accordance with Section 5 of this manual.

Under no circumstances are employees permitted to enter a confined Space in which oxygen level exceeds 23.5%, or has a flammable atmosphere.

e. Lighting Equipment

Temporary lighting in confined spaces shall be either 12V DC or 120V AC when connected to a GFCI. When there is a potential for combustible atmosphere only 12V DC equipment shall be used.

f. Barriers and Shields

Where there is a potential of employees falling into a confined space or a potential of foreign objects entering the space a temporary barrier shall be provided.

5. Procedure for Evaluating Permit Space Conditions

a. Criteria for Atmospheric Testing

1) Oxygen - 19.5 to 23.0%

2) Combustibles - Less than 10% LEL

3) Toxic gases/vapors - any measurement less than the permissible exposure level as defined in OSHA 29 CFR 1910.1000, Subpart Z.

b. During the period of time in which the permit is valid, continuous monitoring shall be accomplished based on the existence of or potential for a hazardous condition. In some cases monitors may be in operation with the entrants to warn of changing conditions.

c. All initial atmospheric testing shall be accomplished from outside the confined space using extension probes.

6. Training

Training shall be in accordance with Section V paragraph A.

7. Designation of Personnel

Each permit required confined space shall have the responsible persons identified by name on the permit, i.e.:

- Supervisor
- Authorized entrants
- Attendants
- Person performing atmospheric tests

8. Emergency Response

Emergency response procedures developed as required by this paragraph shall identify the emergency procedures in effect for confined spaces. This procedure shall be part of the training program outlined in paragraph IV of this section.

9. Procedure for Activating a Permit

a. The supervisor responsible for performing the work shall initiate the permit. Sample permits are found in Appendix C or Form D.

b. The supervisor and entrants shall ensure that all mechanical and electrical systems have been locked, blocked, blinded and tagged out of service.

c. Upon initial atmospheric testing, mechanical ventilation may be required to purge the confined space.

d. Atmospheric testing shall be accomplished by the Safety Coordinator or other competent persons trained in the use of testing equipment.

e. The permit must be completed in full and signed by the supervisor and person performing the atmospheric test.

f. Permits are valid for one shift only, and only for the work and entrants listed on the permit.

g. Permits are void when conditions or operations change inside the confined space, or, when an upset condition exists outside the confined space which has the potential of changing the inside conditions.

10. Multi-Employer Work Projects

In accordance with OSHA 1910.146, employers are responsible for establishing a Confined Space Program. On multi-employer projects, a project procedure will be implemented to coordinate this effort.

11. Procedure for Closing Off a Confined Space

Upon completion of work, the supervisor responsible for the work shall ensure the permit is returned to safety and all block, blinds, electrical locks and tags have been removed.

12. Monitor Procedures for Confined Space

The project competent person shall periodically monitor the procedures for confined spaces to ensure validity. In cases where procedures have been violated by accident or cause, the Safety Coordinator and Department Manager shall jointly investigate the incident. Permits shall be kept on file for a period of one year.

V. TRAINING

A. Each employee assigned to work in a confined space or act as the attendant shall receive a certification that they have successfully completed a comprehensive Training Program. The Training Program as a minimum will cover the following topics:

1. Definitions of a Confined Space
2. Hazardous Materials, Vapors and Gases
3. Atmospheric Monitoring Equipment
4. Ventilation - Local and General
5. Duties
   a. Supervisor
   b. Entrant
   c. Attendant
6. Personal Protective Equipment and Use
   a. Safety Harness
   b. Extrication Equipment
7. Standardized Emergency Procedures. Training will be provided:
   a. Prior to assigned duties
   b. Prior to a change in assigned duties
   c. Whenever there is a change in permit space operations that present a hazard for which the employee has not been trained.
   d. Whenever there is a reason to believe the employee is not proficient in their duties, or inadequacies in the program

B. Attachment A of this section outlines the training guide to be used. This program must include Project specific procedures not included in this guide. Upon successful

completion of this training program (80% proficiency on test) the employee will be issued a card signifying successful completion.

In addition to the training required by this section, employees must also successfully complete all parts of the H-E-B Hazard Communication Program. If respirators are to be used, those employees affected must complete training as required in Section 27 of this manual.

VI. EMERGENCY RESCUE AND RESPONSE

A. Each member assigned to the emergency rescue team must be trained in accordance to paragraph VI of this section.

B. Each member assigned to the emergency rescue team shall be trained in the use of the personal protective equipment to be used.

C. Each member of the emergency rescue team shall receive simulated training in confined space extrication by use of dummies, mannequins, or real personnel. This training must use spaces which are representative of those requiring permits. These practice sessions shall be held at least annually.

D. Each member of the rescue team shall be trained in basic first aid and CPR.

E. At least one member certified in first aid and CPR shall be available at all times permit space operations are taking place.

F. When outside rescue services are used to meet the requirements of this section, they must be provided:

1. The hazards which may be encountered
2. Access to all permitted confined spaces so that appropriate rescue plans can be developed.

VII. CONFINED SPACE CLASSIFICATIONS

A. Class I

Confined space where an atmosphere with dangerous air contamination, oxygen deficiency, or oxygen enrichment is unlikely to develop.

B. Class II

Confined space where an atmosphere free of dangerous air contamination, oxygen deficiency, or oxygen enrichment has been verified.

C. Class III

Confined space where an atmosphere is free of dangerous contamination, oxygen deficiency, or oxygen enrichment cannot be verified.

For the purpose of this procedure and that of consistency COVENANT SERVICES will perform confined space entry in accordance with this procedure and treat all entries as Class III.

Attachment A

PERMIT REQUIRED CONFINED SPACE TRAINING GUIDE

I. PURPOSE

Each person assigned to a confined space entry team must be certified in the duties which must be performed. This training syllabus has been developed to ensure that training throughout COVENANT SERVICES meets both the intent of the law and that programs remain consistent from project to project.

II. TRAINING FACILITATOR

Facilitators performing the training must be competent either through education or experience in Permit Required Confined Space Entry. Training facilitators must have thorough knowledge of confined spaces, hazard associated with toxic atmospheres, monitoring equipment, personal protective equipment, and emergency rescue planning. In addition, facilitators must know blinding and purging, lockout/tagout, ventilation, and toxicological effects.

III. PROGRAM GUIDE

A. WHAT IS REQUIRED?

1. This training program is being provided to each employee involved in confined space entry. The program provides compliance with OSHA 1910.146.

2. Training will be provided:
   a) Before an employee is assigned duties of PRCS.
   b) Before there is a change in these assigned duties.
   c) Whenever there is a change in operations which may present different hazards not previously discussed.
   d) Whenever COVENANT SERVICES believes that the programs and procedures concerning Confined Space Entry are inadequate for the hazards.

3. Each employee will participate in all sections of this program. Upon successful completion of this program a certificate will be issued. This certificate will be good for one year. A copy will be filed on the project. This card must be kept on the person for verification prior to any entry.

B. DEFINITIONS APPLICABLE TO CONFINED SPACES

Confined Space - A space that is:

Large enough and so configured that an employee can bodily enter and perform assigned work; and

Limited or restricted means of entry or exit; and

Not designed for conditions employee occupancy

Permit Required Confined Space - A Confined Space that has one or more of the following characteristics:

Contains or has the potential to contain a hazardous atmosphere.

Contains a material that has the potential for engulfing an entrant.

Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section.

Contains any other recognized serious safety or health hazard.

Entrant - Any person authorized to enter a Permit Required Confined Space.

Attendant - Any person authorized to stay outside of a confined space to maintain contact to those within.

Emergency Rescue Plan - A written program which established emergency procedures to follow during an emergency.

C. HAZARDOUS MATERIALS, VAPOR AND GASES

Oxygen -

- An oxygen level of 20.9% is considered normal regardless of elevation, temperature or humidity.
- A level of 16.5% is sufficient to sustain life.
- A level of 23.5% is considered oxygen rich and must be considered dangerous.

b) When monitoring oxygen levels in confined spaces, this level must be maintained between 19.5% and 21.5%, The ±5% of normal allows for fluctuations in equipment and sensors. Any reading outside of this parameter must be investigated to ascertain the reason for the potential hazard, i.e., leaks in valves/blinds. Spaces, which have oxygen below 19.5 or above 21.5%, must be ventilated and rechecked before entry.

Combustible - Confined Spaces are monitored for their % concentration of a lower explosive limit. Combustible vapor and gases have a lower and upper explosive limit. This is depicted on a Material

Safety Data Sheet as a percent, i.e., 4 to 40%. This is the range in which a gas or vapor can ignite if there is an ignition source such as a spark, flame, even static electricity.

a) The confined space is monitored for the percent of the lower explosive limit. Equipment normally alarms at 20% of the lower explosive limit. If the confined space exceeds 10% of the lower explosive limit, the source of the gas or vapor should be found and blocked prior to entry. Ventilation must be accomplished with intrinsically safe fans/blowers.

1. Toxic Atmospheres - There are numerous toxic materials, gas, and vapors. Some of these gases and vapors can be monitored on a direct reading instrument such as Carbon Monoxide, Hydrogen Sulfide, and Sulfur Dioxide. OSHA has specific Permissible Exposure Limits (PEL) established for these chemicals. Entry into space in which atmospheric concentrations are in excess of the PEL is prohibited. Locate and block the source of the contaminant and ventilate the space prior to entry.

a) This project may have confined spaces which contain these toxic chemicals.

D. ATMOSPHERIC MONITORING EQUIPMENT

(Note: The instruments to be used must be available during this section).

1. Present the instrument's capabilities and limitations.
2. Discuss the alarms.
3. Discuss what to do when alarm sounds.

E. VENTILATION

1. Local - Local ventilation is required when a toxic material is applied, cut burned, or welded. This ventilation normally provides suction near the point of operation and discharges the air into the atmosphere outside the space and away from Heating Ventilation Air Conditioning (HVAC) intakes and other working employees.
2. General - General ventilation can be suction, supplied or both. General ventilation provides clean air to the space at a pre-established rate.
3. Hazards - When various materials must be applied as a coating, cleaner, etc. The air inside a confined space can become potentially dangerous. Material Safety Data Sheets must be reviewed. These materials must be noted on the Confined Space Entry Permit.

F. RESPONSIBILITIES

2. Supervisor - The entry Supervisor is responsible for:

   a) Knowing the hazards which may be encountered during entry, including the mode, signs and symptoms of exposure.

   b) Verifying that a permit is complete and that all tests are complete, systems are safe, and procedures and equipment are in place before allowing entry.

   c) Terminates the entry when work is complete, cancels the permit, and returns it to safety.

   d) Verifies that rescue services are available and the means to summon them are operational.

   e) Remove unauthorized personnel who enter or attempt to enter the space.

   f) Ensures that procedures for entry and work operations are conducted in accordance with the entry procedure and permit requirements.

2. Entr nt - Each entrant must know the following:

   a) The hazards which may be encountered including the mode, signs, symptoms and consequence of exposure.

   b) Proper use of all equipment used in the permit space.

   c) Communicate with the attendant as necessary to enable the attendant to monitor conditions and

   d) Alert the attendant whenever:

      1) They recognize warning signs or symptoms of exposure to a hazard.

      2) They recognize a prohibited condition.

   e) Exit from the space quickly, whenever:

      1) An order to evacuate is given by the attendant or entry supervisor.

      2) They recognize signs or symptoms of exposure to a dangerous situation.

      3) They recognize a prohibited condition.

      4) An evacuation alarm is activated.

3. Attendant - Each attendant is responsible for:

   a) Knowing the hazards faced during entry, including the mode, signs, symptoms and consequences of exposure.

   b) Aware of possible behavioral effects of hazard exposure in authorized entrants.

   c) Continuously maintain an accurate count of authorized entrants, and to identify those listed as authorized on the permit.

   d) Remain outside the permit space until relieved by another attendant

   e) Communicate with authorized entrants as necessary to monitor entrant

status and to alert entrant of the need to evacuate.

f) Monitor activities inside and outside the space to determine if it is safe for entrants to remain inside and to order an immediate evacuation under any of the following conditions:
   1) Detection of a prohibited condition,
   2) Detects behavioral effects of hazard exposure in an authorized entrant,
   3) If the attendant detects a situation outside the space which could endanger the entrants,
   4) If the attendant can not effectively and safety perform the duties of the attendant.

h) Summon rescue and other emergency services as soon as the attendant determines the entrants need assistance in escaping from permit space hazards.

i) Take the following actions when unauthorized persons approach or enter a permit space when entry is underway.
   1) Warn person to stay from the permit space.
   2) Advise the persons they must exit immediately if they have entered the permit space.
   3) Inform the authorized entrants and entry supervisor that unauthorized persons have entered the permit space.

j) Perform non-entry rescues as specified on the emergency action plan, such as winching entrants out with entry tripod.

k) Perform no other duties which may interfere with the attendants primary duty of monitoring and protecting the authorized entrants. ***NOTE****:* It is imperative that the toxicological effects of permit space hazards be discussed prior to the responsibilities section. At the facilitators discretion the Right-to-Know training can be inserted prior to Section F "Responsibility".

G. PERSONAL PROTECTIVE EQUIPMENT (PPE)

1) Mandatory Personal Protective Equipment in confined spaces are:
   a) Hard hat
   b) Eye protection
   c) Safety body belt
   d) Extrication equipment

2) At this point the facilitator shall ensure that all persons being certified are competent in the use, application, and maintenance of the Personal Protective Equipment listed above in G.1

3) Based upon the known or potential hazards, additional Personal Protective

Equipment such as:

a) Protective gloves
b) Protective clothing
c) Face protection
d) Respiratory protection may be required. See Risk Management.

H. STANDARDIZED EMERGENCY PROCEDURES

1) Emergency procedures must be developed specifically for each project. These procedures must be provided to, and reviewed during this section of the training program.

2) Based on class size, need, and time, the facilitator should separate the class into groups and practice a mock entry to a confined space. Each mock case study should have different hazards and conditions. Each group should complete a form identifying a safe entry. Each group should discuss with the other groups their case.

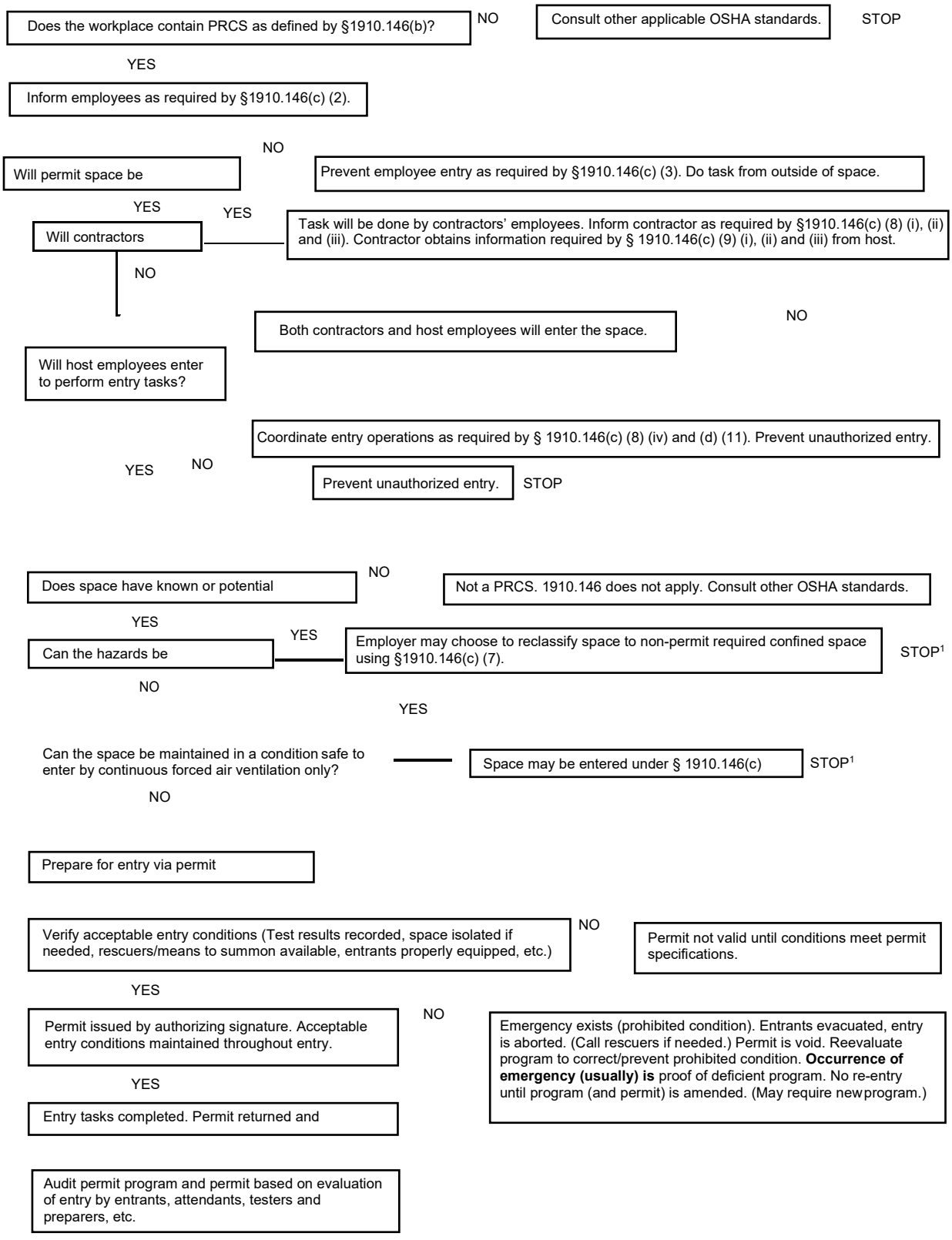
APPENDIX A

CONFINED SPACE INVENTORY REPORT

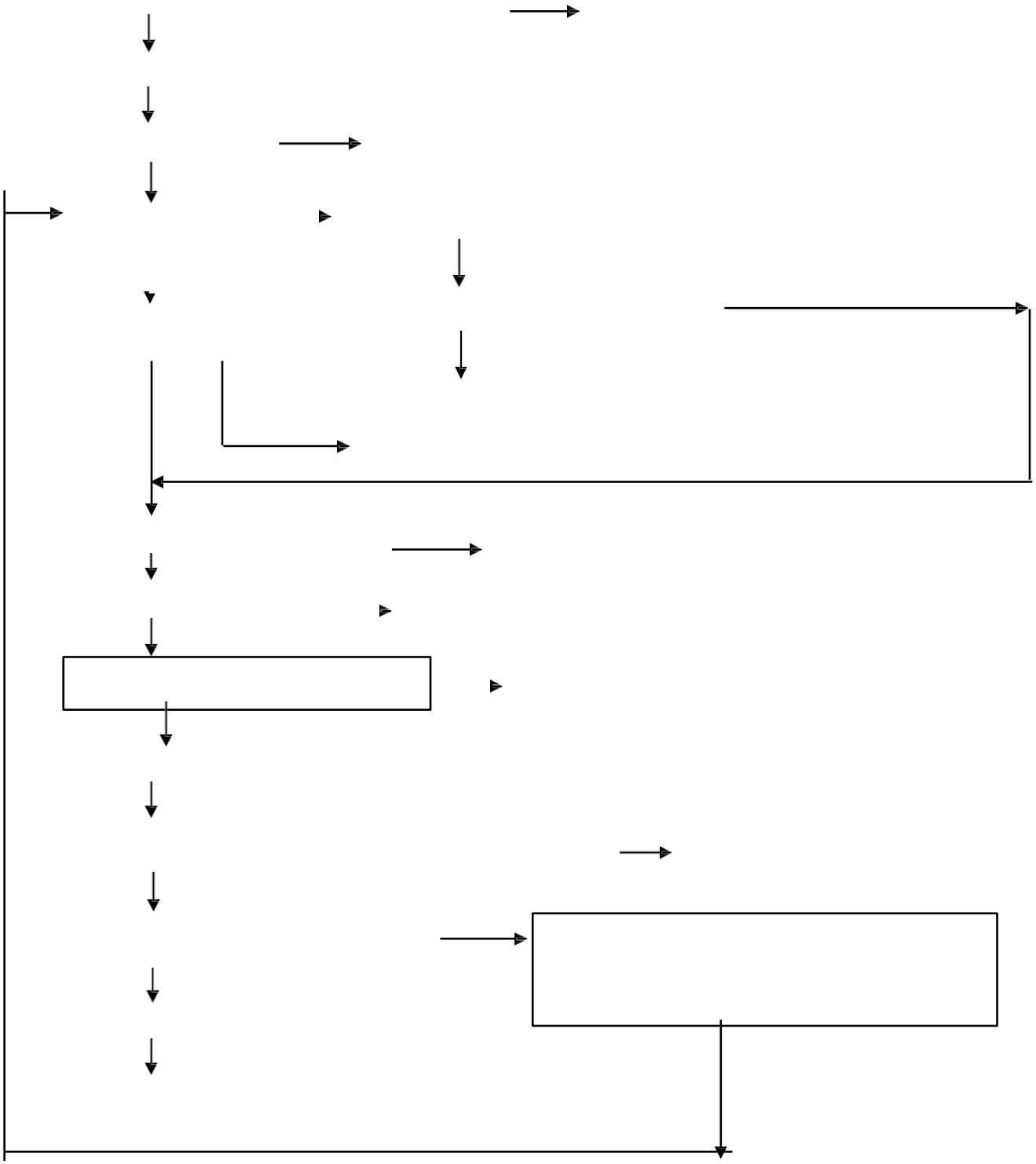
SPECIFIC LOCATION	Permit-Required Confined Space		TESTING REQUIRED		ENTRANTS IDENTIFIED		TRAINING PROVIDED		AREA SUPV.
	YES*	NO	YES	NO	YES	NO	YES	NO	

Appendix B

Permit - Required Confined Space Decision Flow Chart



*Spaces may have to be evacuated and re-evaluated if hazards arise during entry



Appendix C

CONFINED SPACE ENTRY CHECKLIST / PERMIT

Employee Name(s): _____

_____

Jobsite / Location: _____

_____

Emergency Telephone #: _____

Do <u>not</u> enter a confined space until you have considered every question, and have determined the space to be safe.

YES	NO	
( )	( )	Is entry necessary?
		<u>TESTING</u>
( )	( )	Are the instruments used in atmospheric testing properly calibrated? (
)	( )	Was the atmosphere in the confined space tested?
( )	( )	Was Oxygen at least 19.% - not more than 21%?
( )	( )	Were toxic, flammable, or oxygen-displacing gases/vapor present?
		<u>MONITORING</u>
( )	( )	Will the atmosphere in the space be monitored while work is going on?
( )	( )	Continuously?
( )	( )	Periodically? (If yes, give interval:_____)
		(remember – atmospheric changes occur due to the work procedure or the product stored. The atmosphere may be safe when you enter, but can change very quickly).
		<u>CLEANING</u>
( )	( )	Has the space been cleaned before entry is made?
( )	( )	Was the space steamed?
( )	( )	If so, was it allowed to cool?
		<u>VENTILATION</u>
( )	( )	Has the space been ventilated before entry?
( )	( )	Will ventilation be continued during entry?
( )	( )	Is the air intake for the ventilation system located in an area that is free of combustible dust and vapors and toxic substances?
( )	( )	If atmosphere was found unacceptable and then ventilated, was it re-tested before entry?
		<u>ISOLATION</u>
( )	( )	Has the space been isolated from other systems?
( )	( )	Has electrical equipment been locked out?
( )	( )	Have disconnects been used where possible?
( )	( )	Has mechanical equipment been blocked, chocked and disengaged where necessary?
( )	( )	Have lines under pressure been blanked and bled?

CLOTHING/EQUIPMENT

( ) YES ( ) NO Is special clothing required (boots, chemical suits, glasses, etc.)?

If so specify:

_____

( ) ( ) Special equipment required (e.g., rescue equipment, communications, equipment, etc.)?
If so specify:

_____

( ) ( ) Are special tools required (e.g., sparkproof)?
If so specify:

_____

RESPIRATORY PROTECTION

( ) ( ) Are MSHA/NIOSH – approved respirators of the type required available at the worksite?
( ) ( ) Is respiratory protection required (e.g., air purifying, supplied air, self-contained breathing apparatus, etc)?
If so specify:

_____
_____
_____

( ) ( ) Can you get through the opening with a respirator on? (If you don't know, find out before you try to enter)

TRAINING

( ) ( ) Have you been trained in proper use of a respirator?
( ) ( ) Have you received first aid/CPR training?
( ) ( ) Have you been trained in confined space entry and do you know what to look for?

STANDBY/RESCUE

( ) ( ) Will there be a standby person on the outside in constant visual or auditory communication with the person on the inside?
( ) ( ) Will the standby person be able to see and/or hear the person inside at all times?
( ) ( ) Has the standby person(s) been trained in rescue procedures?
( ) ( ) Will safety lines and harness be required to remove a person?
( ) ( ) Are company rescue procedures available to be followed in the event of an emergency?
( ) ( ) Are your familiar with emergency rescue procedures?
( ) ( ) Do you know who to notify and how in the event of an emergency?

PERMIT

(The permit is an authorization in writing that states that the space has been tested by a qualified person, that the space is safe for entry; what precautions, equipment, etc. are required; and what work is to be done.)

( ) ( ) Has a confined space entry permit been issued?

( ) ( ) Does the permit include a list of emergency telephone numbers?

Date of entry: _____ Permit Expires: _____

Competent Persons Signature: _____

Competent Persons Name Printed: _____

Permit must be signed and expires within 8 hours of issue. Periodic checks may be necessary if conditions change.

FORMS

The forms in this section are provided for your use in administering your confined space entry program. You may copy and alter these forms to suit your location's particular needs.

You may want to review applicable regulations before using any form for documentation purposes.

The forms provided are:

FORM A	Confined Space Entry Log (Documents all entry permit issues)
FORM B	Confined Space Entry Checklist (For use in preparation of entry)
FORM C	Confined Space Hazard Evaluation (Documents hazards prior to permit)
FORM D	Confined Space Entry Permit
FORM E	Confined Space Entry Equipment List
FORM F	Confined Space Entry Emergency Information List Non-Entry Rescue Entry Rescue by Employees Entry Rescue by Non-Employees
FORM G	Confined Space Post-Entry Evaluation
FORM H	Confined Space Entry Training Record
FORM I	Confined Space Entry Post-Training Exam

FORM A

CONFINED SPACE ENTRY LOG

Instructions

1. Log each permit issued for confined space entry. Indicate date and time of the entry. This form must be initialed (each time) by the person issuing the permit.
2. When entry is complete, note that the permit has been canceled. Indicate date and time of project completion. The form must be initialed by the person canceling the permit.
3. At least annually, review the permits issued to assess the adequacy of the permit system. Date and initial when complete.

PERMIT NUMBER	CONFINED SPACE NAME	PERMIT ISSUED			PERMIT CANCELED			ANNUAL REVIEW	
		DATE	TIME	INITIALS	DATE	TIME	INITIALS	DATE	INITIALS

FORM B

CONFINED SPACE ENTRY CHECKLIST

1. Evaluate the job.

Identify the work to be performed	Initials	Date
Identify who will perform the work	Initials	Date
Determine when the work will be performed	Initials	Date
Determine the types of hazards associated with the space	Initials	Date
Prepare for entry by completing the confined space entry permit	Initials	Date

2. Brief the team.

Review the permit requirements	Initials	Date
Verify rescue methods to be used and procedures to be followed	Initials	Date
Confirm that rescue personnel are available	Initials	Date
Review the communication procedures to be used	Initials	Date

3. Isolate the space.

Initiate appropriate lockout and tagout	Initials	Date
Clean and/or purge the space	Initials	Date
Ventilate the space	Initials	Date
Verify atmospheric conditions according to permit	Initials	Date

4. Perform the work.

	Initials	Date
	Initials	Date
	Initials	Date
	Initials	Date

5. Conclude the entry and debrief the team.

Exit the space and account for all entrants	Initials	Date
Cancel the permit	Initials	Date
Provide appropriate maintenance to equipment	Initials	Date
Evaluate the entry for problems or opportunities for improvement	Initials	Date

FORM C

CONFINED SPACE HAZARD EVALUATION

			Hazards							
Space #	Confined Space	Location	Low Oxygen Level (less than 19.5%)	High Oxygen Level (more than 23.5%)	Flammable gas or vapor (greater than 10% LFL)	Toxic Material (level above PEL) *Specify*	Config-uration	Engulf-ment	Mech-anical	Elec-trical

FORM D -CONFINED SPACE ENTRY PERMIT

Space Name: Entry No. _____

Purpose: Permit Expires: _____

Entry Date(s): _____ Entry Time(s): _____ Rescue Information: _____

Attendant: _____ Entrants: _____ Telephone No.: _____

Check where provided

HAZARD IDENTIFICATION	Yes	No	EQUIPMENT (SPECIFY)	REQUIRED Yes	No	HAZARD CONTROLS (SPECIFY)	REQUIRED Yes	No
Oxygen deficiency (less than 19.5% at sea level)	⑧	⑧	1. Respiration Protection	⑧	⑧	1. Isolate the space	⑧	⑧
Flammable gases or vapors (greater than 10% of the lower flammable limit or greater than 23.5% oxygen at sea level)	⑧	⑧	2. Protective Clothing or Equipment	⑧	⑧	2. Lockout	⑧	⑧
Toxic gases or vapors	⑧	⑧	3. Communication Equipment	⑧	⑧	3. Clean/Purge	⑧	⑧
Mechanical hazards	⑧	⑧	4. Rescue Equipment	⑧	⑧	4. Rescue Equipment	⑧	⑧
Electrical shock	⑧	⑧	5. Ventilation	⑧	⑧	5. Ventilation	⑧	⑧
Materials harmful to the skin	⑧	⑧	6. Electrical Equipment	⑧	⑧	6. Other	⑧	⑧
Engulfment	⑧	⑧						
Configuration	⑧	⑧						

Air Monitoring Results. Air monitoring equipment used.

		Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM	Time____AM PM
Oxygen Level min	19.5%								
max	23.5%								
Flammability	10% LFL								

H_2S	10 ppm								
CO	25 ppm								
SO_2	2 ppm								
Other (specify)									

Authorization of Entry Supervisor Permits

Name	**Date**	**Phone**	**Additional Instructions?**	**Additional Permits**
			Yes ⑨ **No** ⑨ *If yes, list below*	**Yes** ⑨ **No** ⑨ *If yes, list below*

FORM E

CONFINED SPACE ENTRY EQUIPMENT LIST

Instructions: List all available equipment to be used for confined space entries, where it is stored and who is responsible for the equipment. The responsible person will be contacted to obtain the equipment as the entry team prepares for entry. In addition, this person will be responsible for inventory, maintenance and calibration of the equipment as necessary.

Entry Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Communication Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Emergency Retrieval Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

Air Monitoring Equipment

EQUIPMENT TYPE	STORED LOCATION	PERSON RESPONSIBLE

FORM F

CONFINED SPACE ENTRY EMERGENCY INFORMATION

Instructions:

1. Determine how entrants will be rescued:
    - Non-Entry Rescue
    - Entry Rescue by Non-Employees
    - Entry rescue by Employees

2. Verify responsibilities with all designated responders. If outside responders are used, verify that they have equipment and training to respond to emergencies at your facility.

3. Attach a copy of the Emergency Information (see next page) to all confined space entry permits issued.

Non-Entry Rescue Procedure

1. Never enter a confined space to perform a rescue unless trained to do so. The attendant will prevent untrained and unauthorized personnel from entering the space.
2. Sound local alarm to alert employees of emergency (i.e., shout for help, contact security, etc.)
3. Assess the emergency. Determine the type of injury to the entrant.
4. Verify that retrieving the employee will not result in inflicting additional injury to him or her.
5. Retrieve injured employee using the rescue equipment listed below.
6. Administer First Aid/CPR as necessary. Contact outside emergency responders (911) as necessary.
7. Terminate the confined space entry until the reasons for the emergency have been identified and corrected.
8. Complete company accident investigation reports and workers' compensation reports for any injured employees.

Entry Rescue Procedure

1. Never enter a confined space to perform a rescue unless trained to do so. The attendant will prevent untrained and unauthorized personnel from entering the space.
2. Sound local alarm to alert employees of emergency (i.e., shout for help, contact security, etc.)
3. Assess the emergency. Determine the type of injury to the entrant.
4. Contact emergency responders and key company employees in order of appearance on the call list.
5. Delegate an employee to guide the emergency responders to the site.
6. Assist emergency responders as needed to facilitate the rescue.
7. Administer First Aid/CPR as necessary.
8. Terminate the confined space entry until the reasons for the emergency have been identified and corrected.
9. Complete the company accident investigation reports and workers' compensation reports for any injured employees.

Emergency Call List

	Name	Telephone Numbers							
1.		Work	#	Home	#	Pager #		Cellular	#
2.		Work	#	Home	#	Pager #		Cellular	#
3.		Work	#	Home	#	Pager #		Cellular	#
4.		Work		Home		Pager #		Cellular	

_____ # _____ # _____ _____ # _____

Other designated Emergency Responders

Local Fire Department, Mutual Aid Team, etc.	**Phone #**

FORM G

CONFINED SPACE POST-ENTRY EVALUATION

Entry Date_____ Job Number _____

Job Description _____

What went well? _____

What needs improvement? _____

FORM H

CONFINED SPACE ENTRY — TRAINING RECORD

Company Name: _____ Location:

Instructor: _____ Training Date:

	ATTENDING EMPLOYEES	DEPARTMENT	JOB TITLE
1.			
2.			
3.			
4.			
5.			
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			
16.			
17.			
18.			
19.			
20.			
21.			
22.			
23.			
24.			

FORM I

CONFINED SPACE ENTRY —POST-TRAINING EXAM

PERMIT-REQUIRED CONFINED SPACEQUIZ

1. A confined space may contain such hazards as hazardous atmosphere, the potential for engulfment and/or entrapment, and mechanical hazards.	True ⑨	False ⑨
2. Confined spaces marked with a warning sign may be entered by employees with more than five years of experience without regard to hazard.	True ⑨	False ⑨
3. You may enter a confined space for an unlimited amount of time.	True ⑨	False ⑨
4. Attendants, entrants, supervisors, and rescue personal must be provided specific training with regard to their duties and the hazards they may encounter.	True ⑨	False ⑨
5. Non-entry rescue is usually conducted with a life line and without the need for employees to enter the confined space.	True ⑨	False ⑨
6. If you experience any symptoms such as dizziness, breathing difficulty, etc., you should immediately exit the confined space and alert your supervisor.	True ⑨	False ⑨
7. If you observe an employee who appears to be unconscious inside a confined space, you should enter and attempt rescue without regard to your own safety.	True ⑨	False ⑨
8. An employers must conduct a survey of the confined spaces in its workplace and identify those spaces so that workers will not enter them.	True ⑨	False ⑨
9. If there is the possibility that a confined space contains a hazardous atmosphere, it must be tested to determine if it is safe to enter.	True ⑨	False ⑨
10. One of the duties of an attendant is to stand outside a confined space and monitor the entrants as well as keep unauthorized people from entering.	True ⑨	False ⑨
11. Disregard for the hazards in a confined space can result in injury not only to yourself, but other employees as well.	True ⑨	False ⑨

Answers to "Permit-Required Confined Space" Quiz

1. True

2. False

3. False

4. True

5. True

6. True

7. False

8. True

9. True

10. True

11. True

Depending upon your operations, the hazards involved and the situations that your employees will encounter, you will need to customize this quiz to meet your needs and the learning needs of your employees.

1. PURPOSE

Employees working in areas where chemicals are used, stored or handled must be educated about the potential hazards which may be present. A well-developed program minimizes potential risks to Employees and reduces costs to the company resulting from employee injury and related absences.

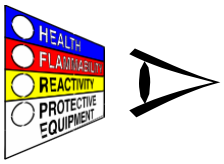
2. RESPONSIBILITIES

1. All locations should have a site specific written Hazard Communication Program. Refer to Appendix F, to complete a site specific program.
2. All hazardous chemical containers (including secondary containers) used within our facilities should be labeled.
3. An inventory of hazardous chemicals/substances used in each facility should be maintained.
4. Safety Data Sheets (SDS's) should be available for each hazardous chemical and accessible for reference by Employees and outside emergency response teams. In addition, the Hazard Communication Program should also be available and accessible for reference.
5. Employees who are or may be exposed to hazardous chemicals in our facilities should be trained in the proper use and hazards of the chemical. Information listed on the SDS should be communicated to affected employees during orientation and subsequent training sessions. Annual refresher training should be performed with all affected employees. Refer

to Appendix G, Hazard Communication Training Guideline.

6. Contractors performing work on our property should be informed of hazardous chemicals, which they may be exposed to. It is the responsibility of management to provide contractors with all applicable information. Contractors bringing hazardous chemicals into our work place are also required to inform us and provide SDS information.

HAZARD COMMUNICATION PROGRAM OVERVIEW



It is the policy in all locations, that the first consideration in the performance of work should be the protection of the safety and health of all employees. We have developed this Hazard Communication Program to ensure that all employees receive adequate information relevant to the possible hazards that may be involved with the various hazardous substances used in our operations and processes. The following program outlines how we should accomplish this objective.

We do not intend to evaluate any of the hazardous substances purchased from suppliers and/or manufacturers. We have chosen to rely upon the evaluation performed by the suppliers or by the manufacturers of the substances to satisfy the requirements for hazard determination.

CONTAINER LABELING

- Chemical containers, which are improperly labeled or have a label, which is not legible, should not be used until a proper label is attached.
- All chemicals (whether in bags, drums, barrels, bottles, boxes, cans, cylinders, reaction vessels, storage tanks, etc.) should be checked by the receiving department to ensure the manufacturer's label is intact, is legible, and has not been damaged in any manner during shipment. If the label is damaged contact the supplier for a replacement label.
- Each label should contain; (a) the chemical name of the contents, (b) the appropriate hazard warnings, and (c) the name and address of the manufacturer, and any other information required.
- All secondary containers should be labeled. The information should include details of all chemicals as stated on the primary container. Containers that will not be used as storage and will remain in constant control by the user until the chemical is disposed of or used up in the process need not be labeled.

SAFETY DATA SHEETS(SDS)

- Each location should maintain a master SDS file as well as a department specific file. These Safety Data Sheets are available to all employees, at all times, upon request.
- The location manager or a designee should be responsible for reviewing all incoming SDSs for new and significant health/safety information (the company should ensure that any new information is passed on to the Employees involved through a training session).
- The location manager or designee should review all incoming SDSs for completeness. If any SDS is missing or obviously incomplete, a new SDS should be requested from the manufacturer or distributor. Any new information should be passed on to Employees involved. Appendix A, Sample Letter for Requesting Material Safety Data Sheets.
- New materials should not be introduced into the work area until a SDS has been received.
- The purchasing department and supervisors who order department materials should make it an ongoing part of their function to obtain SDSs for all new materials when they are first ordered.

- The location manager or their designee should coordinate with appropriate departments to make sure all SDS's are obtained, distributed and communicated.

- Only the chemicals approved for each facility will be used in that facility. Location Management must approve all chemicals in use.

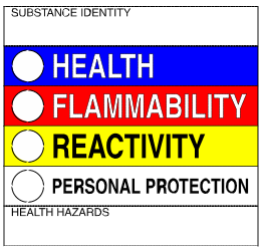
List of Hazardous Substances

Each facility should compile, annually review, and update as necessary a complete inventory of all substances present in that facility. The name of those materials determined to be hazardous is defined in applicable Federal and State standards. See Appendix B, Work Area Hazardous Substance List to assist in this compilation.

Employee Information and Training

All Employees who are exposed to hazardous substances in the workplace should attend an orientation meeting for information and training on the following items prior to starting work with hazardous substances (Training CHECKLIST is to be completed and kept on file). Appendix C, Manager Training of Employee Checklist.

- An overview of the requirements of the Hazard Communication Standard, including their rights under this regulation.
- Information on where hazardous substances are present in their work areas.
- Information regarding the use of hazardous substances in their specific work areas.
- The location and availability of the written hazard communication program will be provided to all Employees during the orientation meeting. The program should be available in the managers' office.
- The physical and health aspects of the substances in use.
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area.
- The controls, work practices and personal protective equipment which are available for protection against possible exposure.
- Emergency and first aid procedures to follow if Employees are exposed to hazardous substances.



- How to read labels and Safety Data Sheetsto obtain the appropriate hazard information.
- Refresher training should be conducted annually.
- SDS are available in all departments that use hazardous chemicals.

It is most important that all of our Employees understand the information given in the orientation meetings. Questions regarding this information should be directed to the facility's safety representative.

When new substances are introduced into the workplace the department manager should review the above items with each existing employee as it relates to the new materials.

The department manager should also relay all the above department-specific information to each new employee prior to his or her starting work with the hazardous substance(s).

An Acknowledgment Statement is to be completed by each employee receiving this information and training. These should be maintained in an area such as on file in the human resources department. Appendix D, Training Acknowledgment.

Non-Routine Tasks

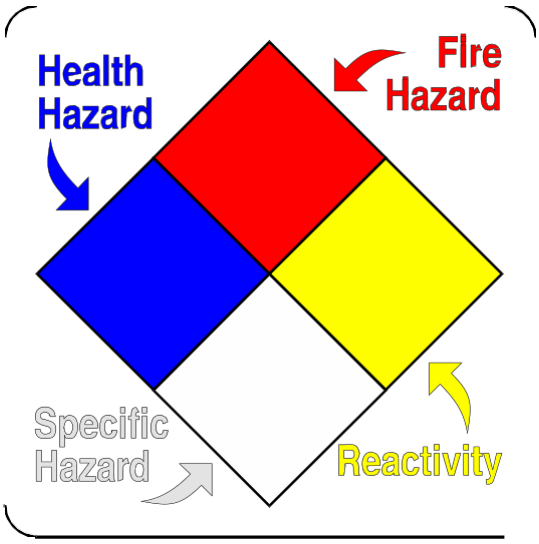
Infrequently, employees may be required to perform non-routine tasks, which involve the use of hazardous substances. Prior to starting work on such projects, each involved employee should be given information by his/her supervisor about hazards to which they may be exposed during such an activity.

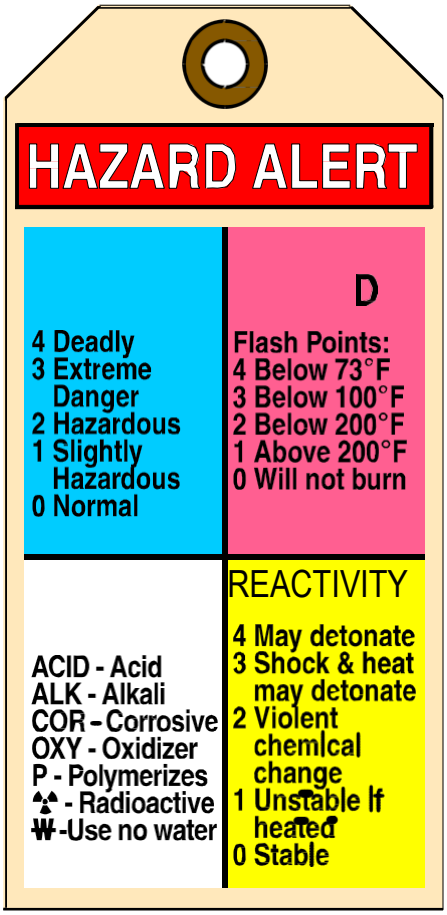
This information should include:

- The specific hazards
- Protective/safety measures which should be utilized
- The measures the company has taken to lessen the hazards, including special ventilation, respirators, the presence of another employee, air sample readings, and emergency procedures

Reading the Hazard Diamond

The illustration below is commonly referred to as the Hazard Diamond as it contains a snap shot summary of Health, Fire, Reactivity, and Specific Hazard information which is rated from 0 to 4 with 4 being the most hazardous. This diamond may be affixed to chemical containers as they arrive in our facility and Employees who handle or are exposed to the chemicals should be aware of the diamond, how to read it, and how to interpret the information.





Example where Hazard Diamond information would be found:

Informing Contractors

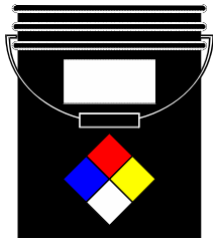
To ensure that outside contractors work safely in our facilities, and to ensure the safety of the contractor's employees, it should be the responsibility of management to provide contractors the following information:

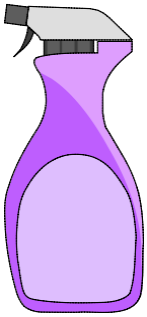
- The hazardous substance to which they may be exposed while working in the facility.
- The precautions the contractor's employees should take to lessen the possibility of exposure by using the appropriate measures.
- The contractors' Hazard Communication Program must meet the minimum OSHA standards. All contractors must abide by the COVENANT SERVICES Hazard Communication Program. All other COVENANT SERVICES safety rules and regulations should be followed.

The location manager is responsible for obtaining from outside contractors the name of any hazardous substance the contractor's employees may be bringing into the facility for use in their work. The contractor should also supply a copy of the material safety data sheet relevant to these materials.

Plan Administration

The location manager should monitor this Hazard Communication program. Questions regarding this program should be directed to the Director Safety and Risk.





INFORMATION FOUND ON ALL SAFETY DATA SHEETS(SDS)

OSHA rules outline the content, but not the exact form, of every safety data sheet. There is a form, Appendix E, Safety Data Sheets Checklist that can be used to review and verify information contained on the SDS. Here is what OSHA requires each data sheet to contain:

x IDENTITY. The data sheet should contain the name of the chemicals found on the label. In addition, subject to deletion of legitimate trade secrets, it should give the chemical and common name of the substance. If the substance is a mixture and has not been tested as such, the data sheet should give the name of each hazardous constituent.

x CHARACTERISTICS. The data sheet should recite the physical and chemical characteristics of the chemical, such as vapor pressure, flash point. etc.

x PHYSICAL HAZARDS. Any potential for fire, explosion or reaction should be included in the data sheet.

x HEALTH HAZARDS. Signs and symptoms of exposure should be entered, as should all medical conditions that are likely to be aggravated by exposure.

x ROUTES OF ENTRY. The data sheet should specify whether the chemical typically enters the system by ingestion, inhalation, dermal exposure or some other route.

x EXPOSURE LIMITS. If OSHA has established an exposure limit for the chemical, or if a Threshold Limit Value has been established by the American Conference of Governmental Industrial Hygienists, these should be entered on the data sheet, as should any exposure limit used by the authority preparing the data sheet.

x CARCINOGENS. The data sheet should indicate whether the national Toxicology Program lists the chemical as a carcinogen, by OSHA, or by the International Agency for Research in Cancer.

x USE AND HANDLING. The data sheet should recite any general applicable precautions for safe handling and use which are known to the Firm preparing the data sheet, including hygiene practices, protective measures during repair and maintenance of contaminated equipment and procedures for clean-up of spills and leaks. Industrial chemical consumers might often add site-specific procedures to the more general information offered by the chemical manufacturer.

x EXPOSURE CONTROLS. The data sheet should include a description of special procedures to be employed in emergencies, as well as description of appropriate first aid.

x DATES. The sheet should bear the date of its preparation or of its latest revision.

x INFORMATION SOURCE. Finally, the sheet should recite the name, address and telephone number of the person who prepared the data sheet or of some other person who can provide additional information relating to the chemical, such as citations to scientific literature or specialized emergency procedures.

SUMMARY OF SAFETY DATA SHEET SECTIONS

The SDS is obtained from the hazardous substance manufacturer or supplier. You should become familiar with information on this sheet to avoid injury to yourself and fellow employees. Following is a description of the SDS's principle sections. Not all sections are relevant to your safety, but brief descriptions should be provided.

Section I–Identification of Product

This identifies the chemical name, trade name or synonym, manufacturer's name, chemical formula, and emergency phone number for more detailed information.

Section II–Hazardous Ingredients

Hazardous ingredients are those substances which have been defined as hazardous due either to flammability characteristics or to their potential to have adverse health effects on the employee. The percentage of each hazardous ingredient in the product is provided, as well as the Threshold Limit Value.

Section III–Physical Data

This is primarily technical data providing little help to you unless you are a chemist. This data is used by chemists and industrial hygienists when doing calculations to determine the safe use parameters of the substance.

Section IV–Fire and Explosion Hazard Data

In this section, data is provided which describes the ability of the substance to burn or explode. The method for extinguishing a fire involving the substance is also provided. Pertinent data in this section is:

*Not all hazardous substances are flammable or explosive.

x Flash Point – This is the lowest temperature at which the liquid gives off sufficient vapor to form an ignitable mixture with air and produce a flame when an ignition source is brought near the surface of the liquid.

x Extinguishing Media – The type of fire extinguishing material to be used when a particular substance is burning is provided here.

x Special Fire Fighting Procedures – These procedures describe the fire fighting equipment needed if the substance is involved in a fire. Some substances can give off toxic gases when burning; therefore, persons fighting the fire would wear a special piece of personal protection equipment. Talk to your supervisor regarding your actions in the event of a fire involving a hazardous substance.

x Unusual Fire and Explosion Hazards – This section provides information on substance incompatibility or its ability to react with other substances to create a flammable atmosphere.

Section V–Health Hazard Data

Data included in this section is very important to you. This information should help you recognize the effects of overexposure to a particular hazardous substance, and the emergency and first-aid procedures to take in the event of overexposure.

Terms and their definitions found in this section follow:

x Threshold Limit Value – The value printed on the SDS expresses the airborne concentration of material to which nearly all persons can be exposed day after day without adverse health effects. Threshold Limit Values (TLV) may be expressed in three ways; as a Time Weighted (TWA), as a Short Term Exposure Limit (STEL), and/or as the Ceiling Exposure Limit (C). The TLV is used by engineers and industrial hygienists as a guide in the control of health hazards.

x Effects of Overexposure – Describes what physical effects might be felt (dizziness, headaches, skin irritation, dermatitis, etc.).

x Emergency and First-Aid Procedures – Explains the procedures to follow should it become necessary to provide first-aid treatment to a person who may be overcome by a hazardous substance. The procedures may address exposures that occur through inhalation of the substance, contact with skin, or ingestion (swallowing).

Section VI–Reactivity Data

This section presents information on reactive substances. Reactive substances are materials which, under certain environmental or induced conditions, enter violent reaction with spontaneous generation of large quantities of heat, light, gases (flammable and non-flammable), or toxicants that can be destructive to life and property. Reactions occur often when incompatible materials are mixed together.

Some loosely categorized types of reactive chemicals are:

x Explosives – (i.e. nitroglycerin), reacts to friction, heat, or shock

x Acids – Don't mix with sensitives

x Oxidizers – Don't mix with reducers

x Water Sensitives – Should not be mixed with water

x Pyrophors – Those substances that generate sparks or heat when friction is applied–like a red-tip match head

When reviewing a particular data sheet, note the conditions to avoid, and incompatibility (materials to avoid). In general, isolate from other potentially reactive substances. Use appropriate personal protection gear that is recommended in Section VIII–Special Protection Information.

Section VII–Spill or Procedures

This section directs persons to take certain actions in the event of a hazardous substance spill or leak. Do not attempt to contain a spill or leak by yourself! Get help from your supervisor!

Section VIII–Special Protection Information

This section specifies the proper personal protection devices for specific situations. Types of recommended equipment should include respirators, goggles, face shield and safety glasses, gloves, protective aprons, footwear, etc.

Ventilation equipment should not necessarily be applicable. These requirements are based on amount used; container substance is stored in, conditions use occurs in, etc.

Section IX–Special Precautions

Describes proper storage and handling procedures. This Section is important and provides many of the dos and don'ts employeeed with the substance. It should also alert you to situations to avoid when handling or storing the substance.

Appendix A

SAMPLE LETTER FOR REQUESTING MATERIAL SAFETY DATA SHEETS

Manufacturer/Supplier

Address

Re: Safety Data Sheet Request

Dear Sir or Madam:

The OSHA Hazard Communication Standard (Title 29, Code of Federal Regulations 1910.1200) requires employers to have in their possession the most up-to-date Safety Data Sheets (SDSs) relevant to all hazardous substances in use in their workplaces. Additionally, the standard requires manufacturers of hazardous substances to prepare and provide the SDSs to their purchasers, either directly or through their suppliers.

Accordingly, we are updating our SDS files and potentially hazardous products which we purchase from your company (or a request has been made by one of our employees for an SDS), and request your assistance in providing current health and safety information on these products.

Attached is a listing of products, which we are currently purchasing from your company. Will you please provide current SDS on each of the following products listed?

An early reply will be very much appreciated.

Sincerely,

Appendix B

WORK AREA HAZARDOUS SUBSTANCE LIST

Work Area:

CHEMICAL IDENTITYLABEL/SPECIAL INFORMATION	CAS # OR SERIAL #	VENDOR

Appendix C

MANAGER TRAINING OF EMPLOYEE CHECKLIST

Has the employee been informed and trained in the following?

1.	Information: Has the employee been informed of the following:		YES	NO
	(a)	The requirements of this section		
	(b)	Any operation in the work area where hazardous substances are present		
	(c)	The location of the written Hazard Communication Program		
	(d)	Availability of the written program		
	(e)	Location and availability of hazardous substances list(s)		
	(f)	Location and availability of Material Safety Data Sheets		
2.	Training: Has the employee been trained in the following:			
	(a)	Methods and observations that may be used to detect the presence or release of hazardous substances in the work areas		
	(b)	The physical and health hazards of the substances in the work areas		
	(c)	How Employees can protect themselves from these hazards		
	(d)	Procedures the employer has implemented for employee protection		
	(e)	Appropriate work practices		
	(f)	Emergency procedures		
	(g)	Personal protective equipment to be used		
	(h)	Explanation of labeling systems		
	(i)	Explanation of material safety data sheets		
	(j)	How Employees can obtain and use appropriate hazard information		
	(k)	Personal hygiene when working with substances		
	(l)	General first aid for contact with hazardous substances		

Employee Signature	Manager's Signature
Date	Date

Appendix D

TRAINING ACKNOWLEDGMENT

I have received information on the Hazard Communication Standard 29 CFR 1910.1200 or the appropriate state standard and understand how to interpret and to use the labeling systems and Safety Data Sheets(SDSs) that are in use and accessible to me in my work area. I agree to observe and follow the safe work practices as presented to me in the training sessions I attended on at

_____ _____

Employee's Signature Date

The above named employee has been informed and instructed by on the work practices, chemical hazards recognition, interpretation and use of chemical labels, SDSs, the CFR 29, 1910.1200 (e) or appropriate state standard and the location at which these items are accessible to the employee.

_____ _____

Supervisor's Signature Date

Appendix E

SAFETY DATA SHEETSCHECKLIST

1. IDENTITY	YES	NO
Does it bear the name of the chemical as it appears on the label?		
Does it bear the chemical name and other names by which the substance is known?		
If it is a mixture, does it bear the name of each component that is hazardous?		
2. CHARACTERISTICS		
Does it describe conditions under which fire, explosion, or reaction may occur?		
Does it list other materials with which the substance may come into contact or be exposed to that would result in such hazards?		
4. EXPOSURE HAZARDS		
Does it detail the signs and symptoms of various routes of entry (skin, eyes, ingestion, etc.) as well as various levels of exposure?		
Does it give medical conditions that are likely to be aggravated by such exposure?		
5. PRIMARY ROUTES OF EXPOSURE		
Does it explain the circumstances under which hazardous exposure to the substance typically occurs through various routes?		
6. EXPOSURE LIMITS		
Does it give the exposure limits to the substance set by OSHA or the American Conference of Governmental Industrial Hygienists?		
7. CANCER RISKS		
Does it indicate whether or not OSHA lists the substance as a cause of cancer, by the International Agency of Research in Cancer?		
8. USE AND HANDLING		
Does it specify:		
Methods of preventing fire, explosion, or reaction?		
The proper protective equipment to be worn?		
Proper ventilation procedures?		
Special circumstances under which special protective measures are necessary?		
Procedures for guarding against spillage?		
Proper storage and labeling procedures?		
Actions that are prohibited for the purpose of reducing risks?		
9. CONTROL MEASURES:		
Does it specify		
Methods of diluting the substance?		
Methods of ventilating the area in which the substance is used?		
Personal protective gear to be worn?		
10. EMERGENCY AND FIRST AID PROCEDURES:		
Does it specify		
The proper responses to exposure through various routes, at various levels and according to the severity of signs and symptoms?		
Proper response to fire, explosion and spillage?		

Proper procedures for disposal of spilled materials?		

11. DATE

Does it show the date it was prepared the date of its latest revision?		

12. FURTHER INFORMATION

Does it include the name, address, and telephone number of someone who can be contacted for further information about the substance and for emergency procedures?		

13. GENERAL

If certain information is not given, does it state that the information is not available instead of having blank spaces?		
Is it written so those Employees can be trained to read and understand it?		

Appendix F

HAZARD COMMUNICATION PROGRAM

FACILITY /LOCATION _____

The purpose of the Hazard Communication Program is to ensure that information concerning the hazards of all chemicals used/handled at this facility is provided by COVENANT SERVICES. The hazard information will allow employees to participate in and support the protective measures instituted at this facility.

HAZARD DETERMINATION

The hazard evaluation provided by the chemical manufacturers will be the source of hazard determination for the chemicals used at the facility. Unless instructed differently, mixture of chemicals will be assumed to present the same health hazard as do the components which compromise one percent (by weight or volume) or greater of the mixture. The mixture will be assumed to present a carcinogenic hazard if it contains a component in concentrations of 0.1 percent or greater which considered to be a carcinogen.

MATERIAL SAFETY DATA SHEETS

Safety Data Sheets (SDS' s) will be obtained for each hazardous chemical used or handled by H-E-B Employees at this facility.

Copies of the SDS's and the Master Chemical Inventory list will be available for employee review at the following location(s):

_____

_____

_____

_____

_____

_____

The SDS File/Notebook will be maintained in the following format:

_____

_____

As listed in the Master Chemical Inventory List.

If the SDS is not received at the time of the first shipment of a hazardous chemical, the supplier/manufacturer must be notified as soon as possible. Outdated SDS's will be replaced in a timely manner.

The Employee(s) responsible for maintaining the SDS File/Notebook is/are:

_____

_____

EMPLOYEE INFORMATION AND TRAINING

Information concerning hazard communication will be provided to COVENANT SERVICES employees regarding:

1. The requirements of the OSHA Hazard Communication Standard.
2. Work area where chemical hazards are present.
3. The location and availability of the written hazard communication program, list of hazardous chemicals, and Material Safety Data Sheets.

COVENANT SERVICES Employees will be trained in:

1. The methods and observations they may use to detect the presence or release of a hazardous chemical in their work area.
2. The physical and health hazards of the chemical in their work area.
3. The measure employees can take to protect themselves, which include:
    - work practices
    - emergency action procedures
    - personal protection equipment
4. The word used in the facility's labeling system and SDS's.

5. Employees will be trained at the time of their initial assignment, anytime a employee is re- assigned to a new area or department where the hazards are different, whenever a new hazard is introduced into their work area, annually, and whenever the process is changed and new chemical hazards are created.

Training on the hazards of non-routine tasks will be conducted as specified in the training program.

The individual(s) responsible for conducting the employee training is/are:

_____

_____

NON-ROUTINE TASKS

Before conducting any job task that involves a hazardous chemical and the job task is not part of the normal job assignment, COVENANT SERVICES will:

1. Review the job task and the appropriate SDS to ensure that the job task can be completed safely.
2. Ensure that all of the required Personal Protective Equipment (PPE) Special tools and equipment are available and used during the completion of the task.
3. Hold a meeting with all Employees involved in the job, reviewing the job task, the job assignments, the SDS's on the hazardous chemicals involved, the required PPE, and special tools and equipment to be used.
4. Supervise the job task until it is completed.

ON-SITE CONTRACTORS

Whenever Contractors come onto the facility, managers at the facility must perform the following duties:

1. Provide appropriate SDS's to on-site Contractors on the hazardous chemicals at the facility whenever their employees may be exposed to a hazardous chemical. The SDS's will be provided to the Contractor's Representative responsible for employee training/safety.

2. Explain to the Contractor Representative the hazards associated with the chemicals, the required PPE, chemical labeling system and specific location of the chemicals.
3. Ensure that Contractors have SDS's available on the hazardous chemicals brought on site.
4. Review and evaluate the SDS's on the Contractor's chemicals. Provide hazard information and safety training to all employees who are and/or might be affected by these chemicals.
5. Ensure that the Contractor maintains his SDS Book and Chemical Inventory List on our site.
6. Ensure that Contractors provide their employees the PPE required for the hazardous chemicals they bring on site and the chemicals used at the facility.

The person/persons responsible for the Contractors at this facility is/are:

_____

_____

LABELS AND OTHER FORMS OF WARNING

Containers of incoming hazardous chemicals must have the Manufacturer's label, tag, or mark affixed to include:

1. The identity of the hazardous chemicals, cross-referenced to the applicable SDS.
2. Appropriate hazard warnings
3. Name/address of the chemical manufacturer.

Labels on incoming containers will not be removed or defaced.

Portable containers into which hazardous chemicals are transferred will be labeled, unless all of the following conditions are met:

1. The contents of the portable container are for the immediate use by the person making the transfer.
2. The container is used only by, and remains under the direct control of the person making the transfer.

3. The unlabeled portable container is used only within the work shift during which it was originally filled.

If portable containers require labeling, the following information must be included on the label:

1. The Chemical's Name
2. Hazard Warnings
3. Required PPE

All stationary vessels and portable containers not excluded above will be labeled by the following method (s).

_____

_____

The individual (s) responsible for ensuring labeling facility container/ Vessels/Piping is/are:

_____

_____

_____

MIXING OF CHEMICALS

The mixing of chemicals and/or chemical compounds is strictly prohibited by non-authorized employees. Only authorized and designated employees shall mix chemicals. The authorized and designated employee(s) who can mix chemicals and/or chemical compounds at this facility is/are:

NAME	JOB TITLE

Appendix G

HAZARD COMMUNICATION PROGRAM TRAINING GUIDE LINE

Hello, I'm_____and I would like to talk to you about the Hazard Communication Program for the (location). The intent of this program is to make chemical hazard warning information readily available to all facility Employees so that adequate protective measures can be taken.

The Hazard Communication Program establishes a number of requirements for developing, obtaining, and providing health and safety information on potentially hazardous chemicals used in the work place.

THE PROGRAM INCLUDES:

- x HAZARD DETERMINATION -Chemicals must be evaluated in order to determine if they are hazardous.
- x WRITTEN HAZARD COMMUNICATION PROGRAM -A written program describing all aspects of hazard communication has been developed and is available to all Employees.
- x LABELS -A system of chemical identification has been developed. The chemical name and all associated health hazards are included in this labeling system.
- x INFORMATION AND TRAINING -Employees must be informed as to the program aspects and trained as to the hazards of the chemicals they work with.

Let's now look at the specifics of the Hazard Communication Program.

CHEMICAL INVENTORY MANUALS

A list of all chemicals used at this location and copies of all SDS's are maintained at _____,

The list and the associated SDS's are maintained in (alphabetical order by common or trade name.) This listing and SDS books are available for use by all Employees for determining hazards associated with a chemical, and precautions to be taken when working with them.

SAFETY DATA SHEETS(SDS's)

SDS's shall be used as the chief means of determining whether or not a chemical or substance is hazardous. Safety Data Sheets provide the following information:

Chemical Identification -The first section helps you to identify the chemical by name, trade names, and the chemical manufacturer.

Hazardous Ingredients -This section lists what is in the chemical mixture that can harm you. It also lists the concentration of the chemical ingredient and the exposure limit to which you can safely be exposed.

Physical Data -This section describes the chemical's appearance, color and other physical characteristics such as boiling point, volatility, and vapor pressure.

Health Hazards -This section lists symptoms of over exposure. It also provides first- aid emergency procedures in case of overexposure.

Reactivity Data -Whether the chemical reacts with other chemicals, water, or certain conditions such as temperature. Incompatibility information lists the materials, such as water, that causes the chemical to burn, explode, or release dangerous gases. Instability describes environmental conditions, such as heat, that cause a dangerous reaction.

Spil1 Leak Procedure -This section tells you what to use to clean up a spill, and which protective equipment should be used. This section may identify how to dispose of the chemical safely.

Special Protection -Here you will find a listing of any personal protective equipment needed to work safely with the chemical. If protective equipment is needed, this section may list the specific types that are recommended.

Special Precautions -This section lists other special precautions to follow. This section may also list other health and safety information not included in any other section.

Now, we will review an SDS on_____that is manufactured by_____.This is a product that is used in our facility/site.

TRAINER -Pass out a copy of an SDS on a chemical that is used at your site. Review and describe each section of the SDS. Then ask if there are any questions.

LABELS AND CHEMICAL IDENTIFICATION:

Each container of hazardous chemicals in the work place must be labeled, tagged, or marked with the identity of hazardous chemicals contained in them, and must show hazard warnings appropriate for employee protection. The hazard warning can be any type of message, words, pictures, or symbols, which convey the hazards of the chemical (s) in the container.

Labels and messages must be legible, in English (plus other languages if desired) and must be prominently displayed.

The word, term, or phrase that is used to identify the hazardous chemical (s) on the label must also be use in the associated SDS.

Signs, placards, process sheets, batch tickets, operating procedures, or other such written materials may be used in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the required hazardous chemical identification and hazard warning. The written materials should be readily accessible to the Employees in their work areas throughout each work shift. This also pertains to contractors working in the facility.

Employees are not required to label portable containers into which hazardous Chemicals are transferred, if all the following conditions are met:

- x The contents of the portable container are for immediate use by the person making the transfer.
- x The container is used only by and remains under the control of, the person making the transfer.
- x The unlabeled portable container is used only within the work shift during which it was originally filled.

Labels on incoming containers should not be destroyed, removed, or defaced.

Pipes and piping systems are exempted from the labeling requirements.

PERSONAL PROTECTIVE EQUIPMENT, (PPE)

PPE is required when using certain hazardous chemicals. The amount and type of PPE required depends on the chemical, the hazards of the chemical, and how the chemical is being used.

* TRAINER -Show the types of PPE that are used at your facility and which chemicals require what PPE.

TYPES OF CHEMICALS

So far we have discussed the requirements of the OSHA Hazard Communication Standard. Now let's talk about the types of chemicals, their properties, and the hazards associated with them.

HYDROCARBONS -These substances exist in both liquid and gaseous form. We find them in our work place in the forms of motor fuels, hand lubricants, and fuel gases we use on our forklifts. They are also found in many other chemicals such as solvents, thinners, and paints. Some of the lighter forms of HYDROCARBONS have flash points below 100 degrees Fahrenheit, which makes them flammable. Others will have flash points above 100 degrees, which makes them combustible. All pose a potential for fire or explosion.

The odor given off by hydrocarbons is very similar and distinctive regardless of the type. If you have ever smelled gasoline, which I suspect most of us have, then you are fairly familiar with its odor.

Inhalation of hydrocarbon vapors may cause headaches, dizziness, or in extreme cases, suffocation. Skin and / or eye contact with the liquid can cause irritation. Chronic inhalation studies with light hydrocarbons components have shown kidney damage and kidney cancer in laboratory animals.

When using hydrocarbons, be sure plenty of ventilation is present to prevent a buildup of vapors. Keep these chemicals away from any sources of ignition and always have the proper fire extinguisher handy. Avoid skin and eye contact by wearing impervious gloves and clothing, and chemical splash-type goggles where necessary. To protect against low-level amounts of fumes and vapors, use an approved respirator for protection against "Organic Vapor."

CORROSIVES -Corrosive chemicals are those that can cause visible damage or irreversible changes in any part of the body it comes in contact with. They can burn your eyes and skin and result in permanent damage. Well-known corrosives are sulfuric acid and caustic (sodium

hydroxide). Other less well known corrosives includes phenol and hydroxide. All corrosive materials must be handled with extreme caution and appropriate protective equipment, such as gloves, chemical goggles, and face shields. If contact does occur, flush the area with water for 15 minutes then seek medical attention.

CHEMICAL ASPHYXIANTS -These are chemicals which can cause suffocation by chemically restricting the intake of oxygen or by respiratory paralysis. Two such chemicals are carbon monoxide and hydrogen sulfide. Other forms of asphyxiants are the inert gases such as nitrogen and argon. Most of these are odorless. Even hydrogen sulfide, with its odor of rotten eggs, cannot be relied on for detection by smell, as it will kill your sense of smell after just a short exposure to fairly low concentrations. As these chemicals rob the atmosphere of oxygen, they are classified as Immediately Dangerous to Life and Health, (IDLH), the only acceptable respirator is an air supplied respirator such as pressure/demand hoseline, masks, or a self- contained breathing apparatus such as a Scott Air Pak. Do not attempt to work in these situations without notifying your supervisor.

IRRITANT GASES -Gases which are irritating (and in some cases severely irritating) to the skin, eyes, and respiratory tract, are considered irritant gases. Examples of these gases are chlorine, ammonia, and sulfur dioxide. All three of these gases have very pungent odors and will immediately cause irritation and discomfort to the eyes, skin, or respiratory tract.

SYSTEM TOXIC CHEMICALS -These are chemicals, which upon inhalation, ingestion, or absorption through the skin have the potential to cause damage within the body. Damage is focused or "targeted" to specific systems or organs, such as the nervous system, lungs, kidneys, or liver. Examples of these chemicals are phenol, tetraethyllead, and methyl cellosolve. Also, they can be present in small quantities in other chemicals.

CARCINOGENS AND SUSPECT CARCINOGENS -Chemicals, which have the potential or suspected potential to cause cancer, are known as carcinogens. Suspected Carcinogens are those chemicals, which have been shown to cause cancer in humans. Benzene is a carcinogen, which can cause leukemia. Benzene can be found in gasoline and in refinery workplaces. Another known carcinogen is asbestos. Asbestos has been linked to lung cancer. Knowledge of what you are dealing with and the proper personal protective equipment are essential in working with these types of chemicals.

The categories we have just talked about are broad range characteristics. The chemicals you use may have one or more of the above characteristics. That is why it is so important to put the SDS' s to work to determine the exact nature of the chemical, its hazards, and the precautions necessary to protect yourself against those hazards. Never work with a chemical unless you know the hazards associated with the chemicals.

MIXING OF CHEMICALS

At our facility, no employee shall mix chemicals or chemical compounds together unless that employee is specifically authorized to do so. If certain chemicals are mixed together they can explode, ignite, and release hazardous chemicals (gas/fume cloud) into the work area. If you are to be designated and authorized to mix chemicals, you will receive additional training about mixing chemicals and the specific chemicals to be mixed.

NON ROUTINE TASKS

Before performing any job task that involves a hazardous chemical and job task is not part of your normal job assignment, you must:

- Attend a meeting prior to starting the job task. In the meeting, the scope of the work will be reviewed, your assignment reviewed, the chemical hazards present will be identified, review of the chemical's SDS, the required PPE, special tools/equipment required, and the safe job procedures to be followed.
- Wear the Required PPE
- Follow Safe Job Procedures

Test

Have all employees complete the written test. After grading the tests, return the tests to the employees, review all of the test questions, and explain the correct answers. Have each employee correct their test and initial the corrected answers. Place the reviewed and corrected tests in each Employee’s personnel file.

This concludes the Hazard Communications Program. Remember; always know what chemical you are using and the precautions to take to use it safely.

HAZARD COMMUNICATION TRAINING ROSTER

DATE:_____ INSTRUCTOR: _____

LOCATION/DEPT: _____

The Employees listed below have received Hazard Communication training. The training included: Hazard Determination, the written Hazard Communication Program, Container Labeling, location of and understanding Safety Data Sheets-SDS, Personal Protective Equipment, and Handling/Using hazardous chemicals safety. The training class was conducted as a group discussion and question and answer session.

NAME (PRINT)	DATE	SIGNATURE

1. PURPOSE

Areas identified with high noise exposure require employee communication and protection while working in them.

2. RESPONSIBILITIES

1. As a general rule of thumb, any work area where two people can not talk in a conversational tone should be surveyed to determine if excessive noise levels exist which may affect our workers.
2. Noise testing and surveys should be performed of all suspect areas and copies of reports retained for future reference. Re-testing should be performed if equipment or other changes are made which may affect the area's noise levels.
3. Areas determined to be high noise locations should be evaluated to determine methods of reducing the noise levels. Engineering controls should be considered as our first priority with administrative controls our second option.
4. Employees who are affected by high noise levels and are determined to meet OSHA's action levels for noise exposure should be included within this program. Those affected employees should receive audiometric testing, hearing protection, and initial and annual training as detailed within this program. Records should also be maintained as noted.

5. Post a copy of the standard.

HEARING CONSERVATION PROGRAM OVERVIEW

Noise can destroy hearing. It can create physical and psychological stress.
And it can contribute to accidents by making it impossible to hear warning signals.

It may be possible to:

- Use quieter work processes
- Alter or enclose equipment to reduce noise at the source
- Use sound-absorbing materials to prevent the spread of noise by isolating the source

Noise problems can often be solved by the combined efforts and resources of our own safety representatives, insurance loss control representatives, safety engineers, and workers and employers who are directly affected.

THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION (OSHA) REGULATIONS

Under the Occupational Safety and Health Act, every employer is responsible for providing a workplace free of hazards such as excessive noise.

Comprehensive analysis of a noise problem requires a sound survey using adequate and accurate equipment, and acknowledge of the principles of noise evaluation and control. An estimate of the exposure can be obtained without great difficulty with the aid of a sound level meter.

When determining if a facility has an area that should be surveyed a general rule of thumb can be used. If there is difficulty in talking in a conversational tone at a distance of one foot, it would indicate that a noise level should be investigated.

OSHA regulations require every employer to limit workers' noise exposure to 90 decibels, or dB (A), averaged over an 8-hour period. Measurements should be made under normal working conditions. When information indicates that any employee's exposure to noise may equal or exceed an 8-hour time-weighted average of 85 decibels, we need to implement a Hearing Conservation Program.

If noise exposure rises above these levels, then we should use "engineering controls" - changes in the physical work environment, then "administrative controls" - limits on individual employees ' exposure time. While such controls are being implemented, workers should be provided with personal protective equipment, such as earmuffs or plugs, to protect their hearing.

Personal protective devices are generally not a good permanent solution for a number of reasons. They may cause infections or discomfort. They may not work effectively because of the difficulty in getting an acceptable fit for each individual. In some cases - particularly when noise is intermittent and below 85 dB(A) - they may make communication more difficult, which can contribute to accidents and make jobs more difficult to perform. If ear protection equipment is not effective or comfortable, the worker should discuss the problem with his or her supervisor. Other devices may be more satisfactory, and perhaps permanent noise control measures may be installed more quickly.

If sound levels are above the OSHA limits, each facility should maintain an adequate hearing conservation program. The program should include hearing tests (audiograms) for each overexposed Employee and retesting or referral to a qualified physician if an employee's hearing ability is reduced by 20 decibels at any frequency.

Any work area that has been designated a high noise area should have clearly visible signs posted at or near entryways to read WARNING **– HEARING PROTECTION REQUIRED.**

EMPLOYEE MONITORING

Noise level testing and employee exposure evaluations should be performed where warranted within our facilities. The information obtained from those evaluations should be summarized within an Industrial Hygiene Report. Additional or future noise exposure measurements should also be conducted whenever exposures are expected to change; such as the addition of new equipment.

Noise level testing and employee monitoring can often be obtained through by the use of our own in-house safety representatives, or through insurance loss control representatives, or contracted safety engineers.

Audiometric Testing

Each facility should establish and maintain an audiometric testing program if employees are exposed to noise levels at or above OSHA's action level of 85 dB (measured as an 8-hour time weighted average). The important elements of an audiometric testing program include baseline audiograms, annual audiograms, training, and follow-up procedures. Audiometric testing should be made available at no cost to all employees who are exposed to an action level of 85 dB or above, measured as an 8-hour TWA.

The audiometric testing program follow-up should indicate whether your hearing conservation program is preventing hearing loss. A licensed or certified audiologist (specialist dealing with an individual having impaired hearing), an otolaryngologist (physician specializing in the diagnosis and treatment of disorders of the ear, nose, and throat), or a physician should be responsible for the program.

Both professionals and trained technicians may conduct audiometric testing. The professional in charge of the program does not have to be present when a qualified technician conducts tests. The professional's responsibilities include overseeing the program and the work of the technicians, reviewing problem audiograms, and determining whether referral is necessary.

The employee needs a referral for further testing when test results are questionable or when problems of a medical nature are suspected. If additional testing is necessary or if the employer suspects a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors, the employee should be referred for a clinical audio logical evaluation or ontological exam, as appropriate. There are two types of audiograms required in the hearing conservation program: baseline and annual audiograms.

The baseline audiogram is the reference audiogram against which future audiograms are compared. For new Employees, the baseline audiogram must be completed within 6 months of his / her hire date.

Annual audiograms should be conducted within 1 year of the baseline. It is important to test hearing on an annual basis to identify deterioration in hearing ability so that protective follow-up measures can be initiated before hearing loss progresses. Annual audiograms should be routinely compared to baseline audiograms to determine whether the audiogram is valid and to determine whether the employee has lost hearing ability--i.e., if a standard threshold shift (STS) has occurred. STS is an average shift in either ear of 10 dB or more at 2,000, 3,000, and 4,000 hertz.

HEARING PROTECTION

Hearing protectors should be provided and are required to be worn at all times by any employee assigned to work in an area that has been determined to generate elevated noise levels.

Hearing protectors should also be provided to any other employee who desires to use them.

Hearing protection will be available and provided for all employees assigned to high noise areas

at
no cost to them. Supervisors and/or Security should maintain a quantity of hearing protection supplies accessible to those employees who are required to wear them.

Hearing protectors should adequately reduce the severity of the noise level for each employee's work environment. Each facility should reevaluate the suitability of the employee's present protector whenever there is a change in working conditions that may cause the hearing protector being used to be inadequate. If workplace noise levels increase, employees should be given more
effective protectors. The protector should reduce employee exposures to at least 90 dB and to 85 dB when an STS already has occurred in the worker's hearing. Employees should be shown how to use and care for their protectors and should be supervised on the job to ensure that they continue to wear them correctly.

For worker protection, the facility should choose hearing protection (earplugs) that reduces the noise exposure below the exposure in the environment. The noise reduction rating (NRR), which is found on the package containing the type chosen, is a single-number, laboratory-derived rating that the EPA requires to be shown on the label of each hearing protector sold.

To ensure we have the proper hearing protection, take the NRR, divide by 2 and subtract that number by the noise level in the environment. Are you under 85? If not, you need a higher NRR.

Employee Training

Employees exposed to TWAs of 85 dB and above should be trained upon initial assignment to the area and at least annually on:

- the effects of noise on hearing
- the purpose and the use of hearing protectors, the advantages and disadvantages of various types
- instructions in the selection, fitting, use and care of protectors
- the purpose of audiometric testing and an explanation of the test procedures

The training program may be structured in any format, with different portions conducted by different individuals and at different times, as long as the required topics are covered.

Recordkeeping

- Noise exposure measurement records should be kept for 2 years.
- Records of audiometric test results should be maintained for the duration of employment of the affected employee. Audiometric test records should include the name and job classification of the employee, the date, the examiner's name, the date of the last acoustic or exhaustive calibration, measurements of the background sound pressure levels in audiometric test rooms, and the employee's most recent noise exposure measurement.

All records should be provided to employees at their request.

Appendix A

Occupational noise exposure. - 1910.95

Regulations (Standards - 29 CFR) - Table of Contents

- **Part Number:** 1910
- **Part Title:** Occupational Safety and Health Standards
- **Subpart:** G
- **Subpart Title:** Occupational Health and Environment Control
- **Standard Number:** 1910.95
- **Title:** Occupational noise exposure.

- **Appendix:** A , B , C , D , E , F , G , H , I

1910.95(a)

Protection against the effects of noise exposure shall be provided when the sound levels exceed those shown in Table G-16 when measured on the A scale of a standard sound level meter at slow response. When noise levels are determined by octave band analysis, the equivalent A-weighted sound level may be determined as follows:

FIGURE G-9 - Equivalent A-Weighted Sound Level
(For Figure G-9, Click Here)

Equivalent sound level contours. Octave band sound pressure levels may be converted to the equivalent A-weighted sound level by plotting them on this graph and noting the A-weighted sound level corresponding to the point of highest penetration into the sound level contours. This equivalent A-weighted sound level, which may differ from the actual A-weighted sound level of the noise, is used to determine exposure limits from Table 1.G-16.

1910.95(b)

1910.95(b)(1)

When employees are subjected to sound exceeding those listed in Table G-16, feasible administrative or engineering controls shall be utilized. If such controls fail to reduce sound levels within the levels of Table G-16, personal protective equipment shall be provided and used to reduce sound levels within the levels of the table.

1910.95(b)(2)

If the variations in noise level involve maxima at intervals of 1 second or less, it is to be considered continuous.

TABLE G-16 - PERMISSIBLE NOISE EXPOSURES (1)

Duration per day, hours	Sound level dBA slow response

8	90
6	92
4	95
3	97
2	100
1 1/2	102
1	105
1/2	110
1/4 or less	115

Footnote(1) When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each. If the sum of the following fractions: C(1)/T(1) + C(2)/T(2) C(n)/T(n) exceeds unity, then, the mixed exposure should be considered to exceed the limit value. Cn indicates the total time of exposure at a specified noise level, and Tn indicates the total time of exposure permitted at that level. Exposure to impulsive or impact noise should not exceed 140 dB peak sound pressure level.

..1910.95(c)

1910.95(c)

"Hearing conservation program."

1910.95(c)(1)

The employer shall administer a continuing, effective hearing conservation program, as described in paragraphs (c) through (o) of this section, whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. For purposes of the hearing conservation program, employee noise exposures shall be computed in accordance with appendix A and Table G-16a, and without regard to any attenuation provided by the use of personal protective equipment.

1910.95(c)(2)

For purposes of paragraphs (c) through (n) of this section, an 8-hour time-weighted average of 85 decibels or a dose of fifty percent shall also be referred to as the action level.

1910.95(d)

"Monitoring."

1910.95(d)(1)

When information indicates that any employee's exposure may equal or exceed an 8-hour time-weighted average of 85 decibels, the employer shall develop and implement a monitoring program.

1910.95(d)(1)(i)

The sampling strategy shall be designed to identify employees for inclusion in the hearing conservation program and to enable the proper selection of hearing protectors.

1910.95(d)(1)(ii)

Where circumstances such as high worker mobility, significant variations in sound level, or a significant component of impulse noise make area monitoring generally inappropriate, the employer shall use representative personal sampling to comply with the monitoring requirements of this paragraph unless the employer can show that area sampling produces equivalent results.

..1910.95(d)(2)

1910.95(d)(2)

1910.95(d)(2)(i)

All continuous, intermittent and impulsive sound levels from 80 decibels to 130 decibels shall be integrated into the noise measurements.

1910.95(d)(2)(ii)

Instruments used to measure employee noise exposure shall be calibrated to ensure measurement accuracy.

1910.95(d)(3)

Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that:

1910.95(d)(3)(i)

Additional employees may be exposed at or above the action level; or

1910.95(d)(3)(ii)

The attenuation provided by hearing protectors being used by employees may be rendered inadequate to meet the requirements of paragraph (j) of this section.

1910.95(e)

"Employee notification." The employer shall notify each employee exposed at or above an 8-hour time-weighted average of 85 decibels of the results of the monitoring.

1910.95(f)

"Observation of monitoring." The employer shall provide affected employees or their representatives with an opportunity to observe any noise measurements conducted pursuant to this section.

..1910.95(g)

1910.95(g)

"Audiometric testing program."

1910.95(g)(1)

The employer shall establish and maintain an audiometric testing program as provided in this paragraph by making audiometric testing available to all employees whose exposures equal or exceed an 8-hour time-weighted average of 85 decibels.

1910.95(g)(2)

The program shall be provided at no cost to employees.

1910.95(g)(3)

Audiometric tests shall be performed by a licensed or certified audiologist, otolaryngologist, or other physician, or by a technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometers does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist or physician.

1910.95(g)(4)

All audiograms obtained pursuant to this section shall meet the requirements of Appendix C: "Audiometric Measuring Instruments."

1910.95(g)(5)

"Baseline audiogram."

1910.95(g)(5)(i)

Within 6 months of an employee's first exposure at or above the action level, the employer shall establish a valid baseline audiogram against which subsequent audiograms can be compared.

..1910.95(g)(5)(ii)

1910.95(g)(5)(ii)

"Mobile test van exception." Where mobile test vans are used to meet the audiometric testing obligation, the employer shall obtain a valid baseline audiogram within 1 year of an employee's first exposure at or above the action level. Where baseline audiograms are obtained more than 6 months after the employee's first exposure at or above the action level, employees shall wearing hearing protectors for any period exceeding six months after first exposure until the baseline audiogram is obtained.

1910.95(g)(5)(iii)

Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise. Hearing protectors may be used as a substitute for the requirement that baseline audiograms be preceded by 14 hours without exposure to workplace noise.

1910.95(g)(5)(iv)

The employer shall notify employees of the need to avoid high levels of non-occupational noise exposure during the 14-hour period immediately preceding the audiometric examination.

1910.95(g)(6)

"Annual audiogram." At least annually after obtaining the baseline audiogram, the employer shall obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels.

1910.95(g)(7)

"Evaluation of audiogram."

1910.95(g)(7)(i)

Each employee's annual audiogram shall be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift as defined in paragraph (g)(10) of this section has occurred. This comparison may be done by a technician.

..1910.95(g)(7)(ii)

1910.95(g)(7)(ii)

If the annual audiogram shows that an employee has suffered a standard threshold shift, the employer may obtain a retest within 30 days and consider the results of the retest as the annual audiogram.

1910.95(g)(7)(iii)

The audiologist, otolaryngologist, or physician shall review problem audiograms and shall determine whether there is a need for further evaluation. The employer shall provide to the person performing this evaluation the following information:

1910.95(g)(7)(iii)(A)

A copy of the requirements for hearing conservation as set forth in paragraphs (c) through (n) of this section;

1910.95(g)(7)(iii)(B)

The baseline audiogram and most recent audiogram of the employee to be evaluated;

1910.95(g)(7)(iii)(C)

Measurements of background sound pressure levels in the audiometric test room as required in Appendix D: Audiometric Test Rooms.

1910.95(g)(7)(iii)(D)

Records of audiometer calibrations required by paragraph (h)(5) of this section.

..1910.95(g)(8)

1910.95(g)(8)

"Follow-up procedures."

1910.95(g)(8)(i)

If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift as defined in paragraph (g)(10) of this section has occurred, the employee shall be informed of this fact in writing, within 21 days of the determination.

1910.95(g)(8)(ii)

Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, the employer shall ensure that the following steps are taken when a standard threshold shift occurs:

1910.95(g)(8)(ii)(A)

Employees not using hearing protectors shall be fitted with hearing protectors, trained in their use and care, and required to use them.

1910.95(g)(8)(ii)(B)

Employees already using hearing protectors shall be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.

1910.95(g)(8)(ii)(C)

The employee shall be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the employer suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.

1910.95(g)(8)(ii)(D)

The employee is informed of the need for an otological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected.

..1910.95(g)(8)(iii)

1910.95(g)(8)(iii)

If subsequent audiometric testing of an employee whose exposure to noise is less than an 8-hour TWA of 90 decibels indicates that a standard threshold shift is not persistent, the employer:

1910.95(g)(8)(iii)(A)

Shall inform the employee of the new audiometric interpretation; and

1910.95(g)(8)(iii)(B)

May discontinue the required use of hearing protectors for that employee.

1910.95(g)(9)

"Revised baseline." An annual audiogram may be substituted for the baseline audiogram when, in the judgment of the audiologist, otolaryngologist or physician who is evaluating the audiogram:

1910.95(g)(9)(i)

The standard threshold shift revealed by the audiogram is persistent; or

1910.95(g)(9)(ii)

The hearing threshold shown in the annual audiogram indicates significant improvement over the baseline audiogram.

1910.95(g)(10)

"Standard threshold shift."

1910.95(g)(10)(i)

As used in this section, a standard threshold shift is a change in hearing threshold relative to the baseline audiogram of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear.

..1910.95(g)(10)(ii)

1910.95(g)(10)(ii)

In determining whether a standard threshold shift has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram according to the procedure described in Appendix F: "Calculation and Application of Age Correction to Audiograms."

1910.95(h)

"Audiometric test requirements."

1910.95(h)(1)

Audiometric tests shall be pure tone, air conduction, hearing threshold examinations, with test frequencies including as a minimum 500, 1000, 2000, 3000, 4000, and 6000 Hz. Tests at each frequency shall be taken separately for each ear.

1910.95(h)(2)

Audiometric tests shall be conducted with audiometers (including microprocessor audiometers) that meet the specifications of, and are maintained and used in accordance with, American National Standard Specification for Audiometers, S3.6-1969, which is incorporated by reference as specified in Sec. 1910.6.

1910.95(h)(3)

Pulsed-tone and self-recording audiometers, if used, shall meet the requirements specified in Appendix C: "Audiometric Measuring Instruments."

1910.95(h)(4)

Audiometric examinations shall be administered in a room meeting the requirements listed in Appendix D: "Audiometric Test Rooms."

..1910.95(h)(5)

1910.95(h)(5)

"Audiometer calibration."

1910.95(h)(5)(i)

The functional operation of the audiometer shall be checked before each day's use by testing a person with known, stable hearing thresholds, and by listening to the audiometer's output to make sure that the output is free from distorted or unwanted sounds. Deviations of 10 decibels or greater require an acoustic calibration.

1910.95(h)(5)(ii)

Audiometer calibration shall be checked acoustically at least annually in accordance with Appendix E: "Acoustic Calibration of Audiometers." Test frequencies below 500 Hz and above 6000 Hz may be omitted from this check. Deviations of 15 decibels or greater require an exhaustive calibration.

1910.95(h)(5)(iii)

An exhaustive calibration shall be performed at least every two years in accordance with sections 4.1.2; 4.1.3.; 4.1.4.3; 4.2; 4.4.1; 4.4.2; 4.4.3; and 4.5 of the American National Standard Specification for Audiometers, S3.6-1969. Test frequencies below 500 Hz and above 6000 Hz may be omitted from this calibration.

1910.95(i)

"Hearing protectors."

1910.95(i)(1)

Employers shall make hearing protectors available to all employees exposed to an 8-hour time-weighted average of 85 decibels or greater at no cost to the employees. Hearing protectors shall be replaced as necessary.

1910.95(i)(2)

Employers shall ensure that hearing protectors are worn:

1910.95(i)(2)(i)

By an employee who is required by paragraph (b)(1) of this section to wear personal protective equipment; and

..1910.95(i)(2)(ii)

1910.95(i)(2)(ii)

By any employee who is exposed to an 8-hour time-weighted average of 85 decibels or greater, and who:

1910.95(i)(2)(ii)(A)

Has not yet had a baseline audiogram established pursuant to paragraph (g)(5)(ii); or

1910.95(i)(2)(ii)(B)

Has experienced a standard threshold shift.

1910.95(i)(3)

Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer.

1910.95(i)(4)

The employer shall provide training in the use and care of all hearing protectors provided to employees.

1910.95(i)(5)

The employer shall ensure proper initial fitting and supervise the correct use of all hearing protectors.

1910.95(j)

"Hearing protector attenuation."

1910.95(j)(1)

The employer shall evaluate hearing protector attenuation for the specific noise environments in which the protector will be used. The employer shall use one of the evaluation methods described in Appendix B: "Methods for Estimating the Adequacy of Hearing Protection Attenuation."

..1910.95(j)(2)

1910.95(j)(2)

Hearing protectors must attenuate employee exposure at least to an 8-hour time-weighted average of 90 decibels as required by paragraph (b) of this section.

1910.95(j)(3)

For employees who have experienced a standard threshold shift, hearing protectors must attenuate employee exposure to an 8-hour time-weighted average of 85 decibels or below.

1910.95(j)(4)

The adequacy of hearing protector attenuation shall be re-evaluated whenever employee noise exposures increase to the extent that the hearing protectors provided may no longer provide adequate attenuation. The employer shall provide more effective hearing protectors where necessary.

1910.95(k)

"Training program."

1910.95(k)(1)

The employer shall institute a training program for all employees who are exposed to noise at or above an 8-hour time-weighted average of 85 decibels, and shall ensure employee participation in such program.

1910.95(k)(2)

The training program shall be repeated annually for each employee included in the hearing conservation program. Information provided in the training program shall be updated to be consistent with changes in protective equipment and work processes.

1910.95(k)(3)

The employer shall ensure that each employee is informed of the following:

..1910.95(k)(3)(i)

1910.95(k)(3)(i)

The effects of noise on hearing;

1910.95(k)(3)(ii)

The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care; and

1910.95(k)(3)(iii)

The purpose of audiometric testing, and an explanation of the test procedures.

1910.95(l)

"Access to information and training materials."

1910.95(l)(1)

The employer shall make available to affected employees or their representatives copies of this standard and shall also post a copy in the workplace.

1910.95(l)(2)

The employer shall provide to affected employees any informational materials pertaining to the standard that are supplied to the employer by the Assistant Secretary.

1910.95(l)(3)

The employer shall provide, upon request, all materials related to the employer's training and education program pertaining to this standard to the Assistant Secretary and the Director.

..1910.95(m)

1910.95(m)

"Recordkeeping" -

1910.95(m)(1)

"Exposure measurements." The employer shall maintain an accurate record of all employee exposure measurements required by paragraph (d) of this section.

1910.95(m)(2)

"Audiometric tests."

1910.95(m)(2)(i)

The employer shall retain all employee audiometric test records obtained pursuant to paragraph (g) of this section:

1910.95(m)(2)(ii)

This record shall include:

1910.95(m)(2)(ii)(A)

Name and job classification of the employee;

1910.95(m)(2)(ii)(B)

Date of the audiogram;

1910.95(m)(2)(ii)(C)

The examiner's name;

1910.95(m)(2)(ii)(D)

Date of the last acoustic or exhaustive calibration of the audiometer; and

1910.95(m)(2)(ii)(E)

Employee's most recent noise exposure assessment.

1910.95(m)(2)(ii)(F)

The employer shall maintain accurate records of the measurements of the background sound pressure levels in audiometric test rooms.

1910.95(m)(3)

"Record retention." The employer shall retain records required in this paragraph (m) for at least the following periods.

..1910.95(m)(3)(i)

1910.95(m)(3)(i)

Noise exposure measurement records shall be retained for two years.

1910.95(m)(3)(ii)

Audiometric test records shall be retained for the duration of the affected employee's employment.

1910.95(m)(4)

"Access to records." All records required by this section shall be provided upon request to employees, former employees, representatives designated by the individual employee, and the Assistant Secretary. The provisions of 29 CFR 1910.20 (a)-(e) and (g)-(i) apply to access to records under this section.

1910.95(m)(5)

"Transfer of records." If the employer ceases to do business, the employer shall transfer to the successor employer all records required to be maintained by this section, and the successor employer shall retain them for the remainder of the period prescribed in paragraph (m)(3) of this section.

1910.95(n)

"Appendices."

1910.95(n)(1)

Appendices A, B, C, D, and E to this section are incorporated as part of this section and the contents of these appendices are mandatory.

..1910.95(n)(2)

1910.95(n)(2)

Appendices F and G to this section are informational and are not intended to create any additional obligations not otherwise imposed or to detract from any existing obligations.

1910.95(o)

"Exemptions." Paragraphs (c) through (n) of this section shall not apply to employers engaged in oil and gas well drilling and servicing operations.

1910.95(p)

"Startup date." Baseline audiograms required by paragraph (g) of this section shall be completed by March 1, 1984.

1. PURPOSE

Personal protective equipment needs must be identified at each facility through site-specific assessments. If personal protective equipment is required to be worn by employees, a program should be developed and implemented that includes employee training and communication.

2. RESPONSIBILITIES

1. All facilities should conduct a documented hazard assessment of each workplace to identify hazards and determine if satisfactory personal protective equipment is in use.
2. Personal protective equipment used should meet current American National Standards Institute (ANSI) safety standards as detailed within this program.
3. All employees who are required to wear personal protective equipment should be trained in items when the equipment is necessary, how to wear/adjust/clean the equipment, and equipment limitations.
4. The program should be re-assessed on an annual basis. Employee re-training should be performed when the workplace or equipment use changes. Re-training should take place if the employee's actions indicate they are not knowledgeable of any training area.

PERSONAL PROTECTIVE EQUIPMENT PROGRAM HAZARD ASSESSMENT OVERVIEW

All locations should conduct an assessment of their workplace to identify if hazards are present or are likely to be present that require the use of Personal Protective Equipment (PPE). **Appendix A**, **How to Evaluate the Need for Personal Protective Equipment**, is a guideline that may be used to evaluate the need for eye, face, head, foot, and hand protection. In addition, injury/accident records (OSHA 300) and data should be reviewed to help identify problem areas.

Where hazards are identified which require the use of PPE, we should:

- Select, and have each affected employee use, the types of PPE that should protect the affected employee from the hazards identified in the hazard assessment;
- Communicate selection decisions to each affected employee; and

- Select PPE that properly fits each affected employee.

Personal protective devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

Appendix B, **PPE Hazard Assessment Worksheet**, may be used as a worksheet for performing a PPE hazard assessment.

Training:

Each location providing PPE to employees should also provide training to each worker who is using PPE. Each worker should be trained to know at least the following:

- When PPE is necessary
- What PPE is necessary
- How to properly adjust and wear the PPE
- The limitations of the PPE
- The proper care, maintenance, useful life and disposal of the PPE

As part of the training, each affected employee should show an understanding of the training, and the ability to use the PPE properly. This should be completed before being allowed to perform work requiring PPE.

When the employer has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by the training directives above, we should retrain the employee. Circumstances where retraining is suggested include, but are not limited to, situations where:

- Changes in the workplace render previous training obsolete
- Changes in the types of PPE to be used render the previous training obsolete
- Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill

Documentation

The employer should verify that the required workplace PPE hazard assessment has been performed through a written certification that identifies:

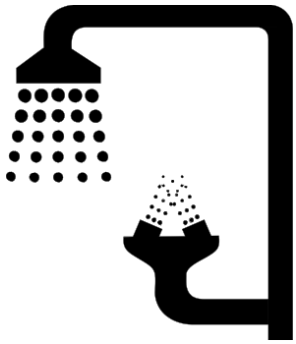
- The workplace evaluated
- The person certifying that the evaluation has been performed
- The date(s) of the hazard assessment
- The document as a certification of hazard assessment

Appendix C, **Form to Document Hazard Assessment**, should be used as verification of PPE hazard assessment.

A written certification is suggested to verify that each affected employee has received and understood the required PPE training. This certification should contain:

- The name of each employee trained
- The date(s) of the training
- Identification of the subject of the training

Appendix D is to be used for documenting **Group Certification of PPE Training**, and **Appendix E**, is for documenting **Individual Certification of PPE Training**.



EQUIPMENT REQUIREMENTS

Personal protective equipment purchased should meet performance and design requirements set up by appropriate ANSI standards. Eye and face protection should comply with ANSI Z87.1-1989, protective headgear with ANSI Z89.1-1986, and protective footwear with ANSI Z41-1991. There is no ANSI standard for hand protection.

Eye and Face Protection is required when hazards include flying particles, liquid chemicals, acids, caustic liquids, gases, vapors, and potentially dangerous light radiation. Eye protection used against flying particles should have side protection. The detachable side protectors (e.g., clip-on or slide-on side shields) meeting the pertinent requirements are acceptable. Employees wearing prescription lenses and requiring eye protection should use safety prescription glasses, or eye protection that is worn over regular glasses or contact lenses.

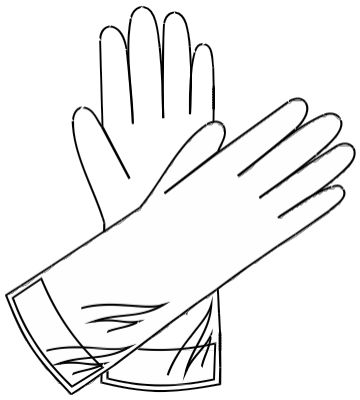
Head Protection should be worn where there is potential of falling objects or electrical shock. This would include, for instance, working below other workers who are using tools and materials which could fall, working around or under conveyor belts which are carrying parts or materials, working below machinery or processes which might cause material or objects to fall, and working on exposed energized conductors.

Foot Protection is to be worn if there is a danger of falling or rolling objects, objects piercing the sole, or electrical hazards. Safety shoes and boots that meet the ANSI Z41-1991 standard provide both impact and compression protection. If needed, safety shoes are also available that provide additional protection, such as puncture resistance, metatarsal protection, and electrical insulation.

Safety shoes or boots with impact protection would be required when workers are carrying or handling objects, materials, or tools that might be dropped on the feet.

The best types to wear in wet areas are of the safety type. These shoes have neoprene soles that are resistant to chemicals. They are also slip resistant on oily or soapy floors. Do not wear sneakers.

Hand Protection is to be worn when employees are exposed to hazardous substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, and temperature extremes. Before purchasing gloves it is important to ascertain from the manufacturer that the glove should appropriately guard against the hazard it is to protect against, since neither ANSI or OSHA currently has test criteria for hand protection devices.



Hearing Protection is required whenever noise levels are over 85 decibels. Protection can be provided in the form of ear plugs or ear muffs. These noise levels may be reached in equipment rooms located at the facility.

For worker protection, the facility should choose hearing protection (earplugs) that reduces the noise exposure below the exposure in the environment. The noise reduction rating (NRR), which is found on the package containing the type chosen, is a single-number, laboratory-derived rating that is required to be shown on the label of each hearing protector sold.

To ensure we have the proper hearing protection, take the NRR, divide by 2 and subtract that number by the noise level in the environment. Are you under 85? If not, you need a higher NRR.

Cleaning and maintenance is a very important consideration for personal protective equipment. PPE should be inspected, cleaned and maintained at regular intervals so that the PPE provides the protection expected.

It is also important to ensure that contaminated PPE, which cannot be decontaminated, is disposed of in a manner that protects workers from exposure to hazards. You should contact local authorities for disposal procedures.

A summary of the cleaning and maintenance practices that you should follow at your facility in order to keep PPE in good working condition should be placed into this Section as an Appendix. You should be able to obtain this from the instruction manuals provided by suppliers.

Purchasing of personal protective equipment is, for the most part, the responsibility of the company except in cases where equipment is very personal in nature and is usable by workers off the job.

Examples of equipment required to be provided by our company include respirators, hard hats, specialty glasses and goggles, specialty foot protection (such as metatarsal shoes), face shields, ear plugs or muffs, and rubber gloves.

Examples of PPE that can be provided by employees include non-specialty safety glasses and safety shoes.

Information regarding the specific types of PPE you have selected to be used in your facility should be placed into this Section as an Appendix.

Appendix A

HOW TO EVALUATE THE NEED FOR PERSONAL PROTECTIVE EQUIPMENT

Conduct a walk-through survey of the areas in question. The purpose of the survey is to identify sources of hazards or potential hazards to workers.

A. During the walk-through survey consideration should be given to the basic hazard categories:
- Impact
- Penetration
- Compression (roll-over)
- Chemical
- Heat
- Harmful Dust
- Light
- Noise

B. During the walk-through survey observe for these potential hazards:
- Sources of motion such as machinery where movement of tools, machine elements, or particles could exist
- Movement of personnel or body parts, which could result in collision with, objects
- Sources of contact with temperature extremes or flash burns
- Types of chemical exposures
- Sources of harmful dust
- Sources of light radiation, i.e. welding, brazing, cutting, high intensity lights, etc.
- Sources of falling objects or potential for falling objects
- Sources of sharp objects, which might pierce the feet or cut the hands
- Sources of rolling or pinching objects which could crush the feet
- Layout of workplace and location of co-workers
- Electrical hazards

C. Observe for these types of exposures to the eyes and face:
- Flying particles, chips or other small objects
- Liquid chemicals, acids or caustics
- Chemical gases or vapors
- Light radiation

D. Observe for these types of exposures to the feet:
- Potential for rolling or dropped objects
- Rolling objects
- Sharp objects, which might be stepped on
- Electrical hazards

E. Observe for these types of hazards to the hands
- Potential skin absorption of harmful substances
- Sharp objects, tools or machines
- Chemical contact exposures
- Temperature extreme contact exposures

Appendix B

PPE HAZARD ASSESSMENT WORKSHEET

Department:		Date
Task	**Potential Hazards**	**Personal Protective Equipment**

Appendix C

FORM TO DOCUMENT HAZARD ASSESSMENT

This is to verify that the following work areas and/or jobs have been assessed to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment.

Workplace(s) Evaluated	Date of Assessment

I certify that the evaluation described above was performed as indicated.

_____ _____

Signature of person certifying assessment Date

_____

Name and title of person certifying assessment

Appendix D

GROUP PERSONAL PROTECTIVE EQUIPMENT TRAINING

This is to certify that the employees listed below received and understood required personal protective equipment training for the following equipment:

Type(s) of equipment covered:_____

*** Employee Certification:** *By my signature below, I certify that I have received, and have understood, training regarding the personal protective equipment outlined above.*

Employee Name	Department	Instructor	Date	Employee Signature

I certify that the above employees received and understood the personal protective training described above.

_____
Instructor Name

_____ _____
Instructor Title Date

Appendix E

INDIVIDUAL PERSONAL PROTECTIVE EQUIPMENT TRAINING

EMPLOYEE NAME: _____

DEPARTMENT: _____

SUPERVISOR'S NAME: _____

JOB TITLE: _____

PERSONAL PROTECTIVE EQUIPMENT REQUIRED:

1._____

2._____

3._____

4._____

5._____

DATE OF TRAINING:_____

I certify that I have received and understand training regarding the personal protective equipment required on my job.

_____ _____

Employee Signature Date

I certify that the above employee has received and has understood training regarding the personal protective equipment required on his/her job.

_____ _____

Instructor Signature Date

1. PURPOSE

To provide a systematic approach to evacuating or protecting employees in case of emergency situations.

2. RESPONSIBILITIES

1. The following Emergency Response Program provides direction to each facility, which should be followed in the event of significant emergency (fire, weather, bomb threat, etc.)
2. The program should be customized to fit each facility including emergency evacuation routes and plans, emergency telephone numbers, an analysis of fire hazards, completing each element of the Fire Prevention Program, and designating employees to program roles. This includes naming members of an emergency response team and media spokespersons.
3. To ensure the program is implemented effectively all employees should be trained in their roles and annual drills performed and evaluated by the facility management team each year.

EMERGENCY RESPONSE PROGRAM OVERVIEW

The written emergency response program covers designated actions that should be taken to ensure employee safety from fire and other emergencies. However, no set of procedures and instructions can cover all the requirements for coping with every emergency. The application of good judgment and sound management decisions are necessary to implement all procedures. With this in mind, local management should apply the elements of this program and make appropriate decisions specific to particular facility operations and environment.

This plan is to be used for employee emergency response or evacuation such emergencies as:

- Fire Emergencies
- Weather Related Emergencies
  - Tornado
  - Hurricane
  - Flood
  - Earthquake
- Power Outage
- Bomb Threat

EMERGENCY ESCAPE PROCEDURES & ESCAPE ROUTE ASSIGNMENTS

- Each facility should identify key personnel who should be responsible for ensuring all employees, customers, and / or vendors are safely evacuated.
- If a public-address system is available, emergency evacuation of the facility should be initiated by an alarm signal followed by a public address announcement. The public address announcement should identify the type of emergency and specific evacuation instructions.
- Employees, customers, and vendors should follow posted exits to leave the building.
- All escape routes should be identified.
- The building should be evacuated by following the primary escape routes. In the event the primary escape routes are blocked or otherwise inaccessible, the secondary route of escape should be followed.

RESCUE & MEDICAL DUTIES FOR EMPLOYEES

Employees are not expected nor anticipated to provide first response in the event of an emergency or first aid incident. The typical first response should be by calling “911” for medical assistance. There may be times, however when individuals have received first aid or CPR training on their own and those choosing to respond during an emergency should do so voluntarily as Good Samaritans.

Some facilities have employees that have been trained as first responders. The employees that have been trained should respond according to training they have received.

FIRST AID/EMERGENCY CLEAN-UP PROCEDURES

Following an emergency situation where blood, bodily fluids, or other medical waste products are present follow clean up procedures outlined in the Bloodborne Pathogens section.

As a summary it is our policy to decontaminate the area and remove the waste products in one of the following manners:

- If “911” emergency medical services respond to the incident we should request that they clean, decontaminate, and remove all medical waste products from the incident site.

- If emergency medical personnel are not contacted then an employee may voluntarily choose to assist in the clean-up activities but they are not required to do so.
- All contaminated work surfaces or equipment should be decontaminated after completion of emergency procedures and immediately or as soon as possible after any spill of blood or other potentially infectious materials. Small clean ups may be performed with a 10% bleach solution.
- All employees who volunteer to assist with the clean-up activity should wear gloves provided in the first aid kit. Consult your local telephone directory or contact the local fire department or emergency medical services (EMS) to obtain a reference. All medical waste products should be disposed of through a qualified waste removal company.

The Preferred Means of Reporting Fires and Other Emergencies:

Employees must be trained and aware of the types of alarm systems available within their location, and in the preferred means of initiating a fire alarm or other emergency notification. Examples of alarm initiating devices includes telephones, fire pull stations, alarm pull stations, and other communication or alarm initiation means.

Emergency Numbers:

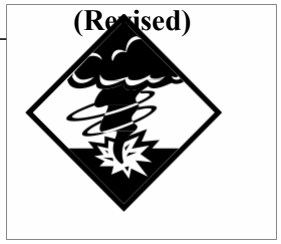
Each location should post in a convenient and accessible location all emergency phone numbers. See **Appendix A, Emergency Numbers**. Adequate postings should be placed to ensure all employees have ready access to these numbers.

Fire Emergency Procedures

- Employees should immediately pull the fire alarm or call the fire department by telephone upon discovery of a fire or other emergency.
- Employees should not attempt to fight building / structural fires or large product fires. The fire extinguishers located throughout the facility are for fires in the incipient stage. Examples, trash cans, small grease fires, small equipment fires, etc. **NOTE: Employees should not use fire extinguishers unless they have received training on fire extinguisher use.**
- Employees should not attempt to extinguish fires using the building fire hoses. The fire hoses are for salvage /cleanup use only.
- When ordered by a supervisor, equipment and utilities should be shut off depending on the emergency and the time available.
- When an order to evacuate is given all employees should follow the established routes in an orderly manner and evacuate.

- After evacuating the facility, employees are to proceed immediately to their designated assembly area to account for all individuals.

- In the event of an emergency, if you have a telephone or paging system, use that system to relay messages or instructions. If you do not, a runner should be used.



NATURAL HAZARDS

The following are guidelines to follow during emergency situations:

TORNADO RESPONSE PROGRAM

Before a Tornado

- Conduct tornado drills before each tornado season. The tornado season is generally March through August.
- Designate an area in the building as a shelter, and practice having employees go there in response to a tornado threat.
- Discuss with employees the difference between a "tornado watch" and a "tornado warning."

Tornado Watch is issued when weather conditions are such that tornadoes are likely to develop. A designated management representative should listen to the radio or television for further developments.

Tornado Warning is issued when a tornado has been sighted or indicated by radar. The danger is very serious and all employees should go to a safe place.

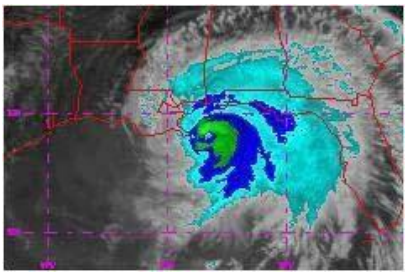
During a Tornado

- Monitor for "tornado watch" and "tornado warning" weather advisories.
- Notify employees, customers and vendors using the PA system (if a system is available) otherwise use a runner system.
- Go to the designated safe place in your building. Seek protection along side inside walls and away from windows.
- Avoid places with wide-span roofs such as cafeterias, large hallway or large unsupported areas with windows and glass.
- Get under a piece of sturdy furniture such as a workbench or desk and hold on to it.
- Use arms to protect head and neck.
- If you are outside, get inside a building. If shelter is not available, lie in a ditch or low-lying area or crouch near a strong building.
- If in a car, get out of the car immediately and take shelter in a nearby building. Never try to out drive a tornado. If there is no time to get indoors, get out of the car and lie in a ditch or low-lying area away from the vehicle.

After a Tornado

- Keep calm. Stay in your shelter until after the storm is over.
- Check people around you for injuries. Seek medical help if necessary.
- Keep listening to the radio or television to get the latest emergency information.
- Leave the building only when authorities say it is safe.
- Use the telephone only for emergency calls.
- Do not enter a damaged building.
- If you smell gas, open the door and turn off the main gas line. Don't turn on lights or appliances until management indicates it is okay to do so. If electric wires are shorting out, turn off the power at the main panel.

HURRICANE RESPONSE PROGRAM



Hurricanes are defined as a storm with pronounced rotary circulation and sustained winds exceeding 74 mph. They are normally accompanied by torrential rains, flooding, and sometimes tornadoes.

Wind speed defines the force/level of a hurricane:

Level	Winds (mph)	Damage Expected	Storm Surge
1	74-95	Minimal	4-5 ft.
2	96-110	Moderate	6-8 ft.
3	111-130	Extensive	9-12 ft.
4	131-155	Extreme	13-18 ft.
5	155+	Catastrophic	18 ft. +

Important Steps to Follow:

Develop a site-specific Hurricane Plan:

- Conduct a Hurricane property self-assessment, develop a site-specific hurricane plan based on the assessment, and inform employees of our plan prior to each hurricane season. Hurricane season is generally late summer through early fall.
- The property self-assessment should include detail of potential building weak spots and planned protection – such as windows, yard buildings or storage trailers.

  Building supplies needed for securing the property should be obtained and stored on-site for areas prone to hurricane activity. Supplies should include ¾ inch plywood (pre-cut and drilled) for covering windows and glass doors. Dock doors and railings should be anchored properly and designed to withstand high winds.
- Coordinate development and refinement of site-specific hurricane plans with local emergency plan coordinators.
- Designate employee communication plans that will be followed in the event of a hurricane (such as telephone message numbers, internet site message locations, or other communication plans).

Impending Hurricane – 48 to 36 Hours Prior to Landfall:

③ Map the hurricane's progress and intensity, keep up to date on the storm's path, monitor the National Weather Service broadcasts.
③ Inspect and repair roof edging strips, gutters, flashing, covering and drains.
③ Strap and anchor to the roof structure (joists) all roof-mounted equipment such as HVAC units and exhaust vents.
③ Ensure the following supplies have been assembled for the emergency response team:

- batteries (C, D, 9V, 6V)
- fueled lanterns (check mantles, fuel), portable lights
- portable radios, mobile phones
- bottled water
- nonperishable food
- duct tape
- plastic sheets (heavy gauge), roofing paper
- sandbags
- rope, tarpaulins, power and manual tools
- ¾ inch plywood, 2x4 studs, nails
- shovels and axes

③ Start – and run for 30 minutes or more – all emergency generators, fire pumps and sump pumps. Check their fuel supplies. Check and service boilers.
③ Update employee home or mobile phone lists, and review communication plan.
③ Update phone lists for roofing, electrical, and restoration contractors.
③ Protect and relocate vital records, remove all loose files from floors and desks and place in cabinets. Back-up all electronic data and store at a water and wind protected site.
③ Install plywood over all windows and doors but do not block any emergency exits.
③ Anchor, secure, dispose of, or relocate anything in the yard that could potentially blow about causing employee injury or facility damage:
- Dispose of or relocate yard debris
- Relocate nonessential yard equipment
- Secure and relocate yard storage of flammable or combustible liquid drums – do not move back in the main building.
- Anchor any portable buildings, sheds, trailers, storage racks, etc.
- Properly rig any large outdoor signs with guy wires secured to anchors.

③ Inspect all fire protection equipment such as sprinkler control valves and fire pumps.

<u>Imminent Hurricane – 36 Hours Prior to Landfall:</u>
③ Ensure that any employee who has volunteered to stay on site has current telephone contact lists, supplies and equipment (potable water, nonperishable food, first aid supplies, flashlights, and mobile phones).
③ Have cash on hand for post-hurricane needs (example buying food and supplies).
③ Fill the fuel tanks of generators, fire pumps, and all company-owned vehicles.
③ Clean out drains, catch basins, and roof drains.
③ Cover computers, machinery, and stock (where possible) with tarpaulins and waterproof covers.
③ Raise as many goods as possible off the ground.
③ Contact the gas utility and determine if it is advisable to turn off gas valves.
③ Notify vendors, delivery companies, and truckers of site closure.
③ Perform assessment of entire property – checking yards, roofs, roof mounted equipment, signs, doors, windows, electrical systems and interiors.

③ Prepare to deactivate all noncritical, nonessential and essential electrical equpment.
③ If an evacuation is ordered by local emergency personnel, secure site and leave immediately.

During a Hurricane:
③ If employees remain at the facility, a refuge area should be identified that is safe from wind and flood. All employees should remain indoors and in this refuge area.
③ If utilities fail, turn off electrical switches and close main gas valves – if possible.

After a Hurricane:
③ Report to corporate all injuries, state of buildings, impairment of utilities, community services and conditions (e.g. roads, sewers, water, etc.).
③ Secure the site. Lock doors and fences.
③ Inspect roofs (entire area and perimeter), roof-mounted equipment, walls, windows (outside and inside), doors and entire yard.
③ Clean roof drains and remove debris from roof to prevent drainage problems.
③ Eliminate safety hazards such as leaking gas or flammable liquids, hazardous materials, or live wires.
③ Visually check damaged bus bars, conductors, and insulators before reenergizing main electrical distribution systems. In case of doubt, contact an electrician. ***Do not touch or move exposed bare wires.***
③ Check foundation and piping.
③ Repair damage to automatic fire sprinkler systems and restore protection as soon as possible. Use impairment monitoring system whenever automatic fire sprinklers and water supplies are impaired.
③ Call key employees and restoration contractors to start repairs. Make sure safety systems are fully operational before work can begin. Control smoking. Use cutting and welding permits. Make Contractors responsible for fire-safety conditions.
③ Initiate employee communication plans.
③ Contact corporate Risk Management to discuss property damage or loss.

FLOOD ACTIVITY PREPARATION & PROCEDURES

Where and when can flooding take place?

Floods are one of the most common hazards in the United States. Historically, **flooding** is the nation's single most common natural disaster. Flood effects can be local, impacting a neighborhood or community, or very large, affecting entire river basins and multiple states. The state of Texas is one of the top ten flood prone states in the country.

However, all floods are not alike. Some floods develop slowly, sometimes over a period of days. But flash floods can develop quickly, sometimes in just a few minutes and without any visible signs of rain. Flash floods often have a dangerous wall of roaring water that carries rocks, mud, and other debris and can sweep away most things in its path.

Be aware of flood hazards no matter where your store is located, but especially if you live in a low-lying area, near water or downstream from a dam. Even very small streams, gullies, creeks, culverts, dry streambeds, or low-lying ground that appear harmless in dry weather can flood.

How can I prepare for a flood?

1 Ensure that you and your store leaders are familiar with the Flood Emergency Response Plan.
2 Ensure that the Emergency Response Kit is built, all items are functional and that you know its location.
3 Ensure that you are familiar with all of the general activities outlined in the Emergency Readiness Manual.
4 Ensure that you are knowledgeable of your local emergency management contacts and procedures. Have all emergency contact numbers readily available.
5 During the heavy storms be aware of weather activity and make a conscious effort to monitor weather activity during stormy periods.

FLOOD EMERGENCY RESPONSE PLAN

What do I do when there is a potential flood (Flash Flood / Flood Watch)?

The definition of a Flash Flood Watch is:

- **Flash Flood / Flood Watch** – A flash flood / flood watch is issued when weather conditions are favorable for flooding in your area. Remain alert for approaching storms and rising waters.

It is always a good idea to have a weather alert radio on site, plugged in (with battery

back-up) and turned on in the event of a weather notification. NOAA weather radios serve as the best early-warning mechanism under any circumstances.

Typically, we are not actively watching the Weather Channel or listening to the radio. Therefore, we must be aware of the external signs that may point towards bad weather and/or tornado activity.

Be alert to what is happening outside. Some of the things to be looking for are:

- If it has been raining hard for a couple of hours, or steadily raining for a couple of days, be alert to the possibility of flooding.
- If your store is located next to a stream, river, lake or major body of water, monitor the level of water to determine if there is possible overrun that could result in flooding
- Be alert to rising water in your parking lot, back loading dock and generally around the store grounds. Consciously take note of the level of water to determine if the water is rising to a level that might enter the store.

Flash Flood Watches will be issued by the local weather service and will be published on local television stations, local radio stations and weather radios. Television or radio news cast will identify specific areas where flooding may occur.

FLASH FLOOD / FLOOD WATCH STEPS

1. Identify the Employee accountable, and a back-up, for monitoring the local weather and executing the activities in this plan.
2. Ensure that the "Emergency Response Kit" is located and all items are functional and accounted for.
3. Test the emergency generator and emergency store lighting if the store is equipped.
4. Rise off of the ground or bring inside the store any items that might be damaged if water was to come in contact or if the product becomes soaked.
5. Raise any items off of the ground inside the store that might be damaged if water was to come in contact. Specifically, files or electronics.
6. Ensure that the sump pump at the back dock is working.
7. Review the "FLASH FLOOD WARNING STEPS" to familiarize yourself with the process in the event of a tornado warning.

What do I do when there is an actual flood (Flash Flood/Flood Warning)?

The definition of a Flash Flood / Flood Warning is:

- **Flash Flood / Flood Warning** – A flash flood / flood warning is issued when flooding is occurring in your area or will soon occur in your area.

Flash Flood / Flood Warnings will be issued by the local weather service and will be

published on local television stations, local radio stations and weather radios.

When a flash / flood warning is issued, the unit of store director should use his or her best judgment on when and which emergency steps to take as a result of flooding

EARTHQUAKE RESPONSE PROGRAM

If in an Earthquake Area

- Remain calm. Move away from all glass, racks, windows, etc. whether secured or unsecured to floors or walls.
- Seek shelter under a sturdy desk or table if available or brace yourself in a corner or doorway.
- Place large or heavy objects on lower shelves.
- Store breakable items such as bottled foods, glass, etc. in closed cabinets with latches.
- Brace overhead light fixtures.
- Get expert advice if there are signs of structural defects.
- Store weed killers, pesticides, and flammable products securely in closed cabinets with latches and on bottom shelves.
- Identify safe places (under sturdy furniture, against inside walls, away from glass, or heavy bookcases).
- Locate safe places outdoors (in the open, away from buildings, trees, telephone and electrical lines, overpasses or elevated expressways).

During an Earthquake

If Inside

- Take cover under a piece of heavy furniture or against an inside wall and hold on.
- Stay inside. The most dangerous thing to do during the shaking of an earthquake is to try to leave the building because objects can fall on you.

If Outdoors

- Move into the open, away from buildings, streetlights, and utility wires.
- Once in the open, stay there until the shaking stops.

If in a Moving Vehicle

- Move the vehicle to a clear area away from buildings, trees, overpasses, or utility wires.
- Stop and stay in the vehicle.
- Once the shaking has stopped, proceed with caution. Avoid bridges or ramps that may have been damaged.

After the Earthquake

- Leave the building as soon as possible after the earthquake ends.
- Be prepared for aftershocks. Aftershocks can occur hours, days, or weeks after the quake.
- Help injured or trapped persons if appropriate. Do not move seriously injured persons. Call for help
- Turn of water supply, except fire sprinkler systems, if found leaking.
- If gas is detected or a broken gas line observed, shut off natural gas at the main valve.
- Check for exposed electrical lines. Do not touch; however, try to disconnect power when possible.
- Listen to a battery-operated radio or television for the latest emergency information.
- Refrain from using telephones, except for emergency assistance, in order to keep lines open.
- Refrain from entering building until told to do so.
- Stay at facility location until authorities say it is safe.

STORE POWER OUTAGE PROCEDURE

The purpose of this document is to provide a general set of guidelines and helpful information to enable each store leader to make the best decision to protect customers, Employees and product. Power outages are one of the largest contributors to product loss in the company. Power outages over one hour can result in costly product loss if actions are not taken to save the product.

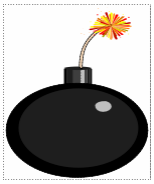
Please familiarize yourself with these procedures. Print out a copy; write your local power company's contact information in the space below and post in the office.

Local Power Company Name and Phone Number:_____

What do I do when the power goes out?

- Wait five minutes before calling anyone to see if the power comes back on; make a note as to what time the power went out.
- Look outside or contact a neighboring business to determine if the power outage is only affecting your store or is area wide.
- If the outage is area wide, contact your local utility company to get an estimated time of recovery for power to your address. You should always have your utility company's number easily accessible.

BOMB THREAT PROGRAM



Reporting Bomb Threats or Suspicious Packages

Any employee or occupant receiving a bomb threat or discovering a package or article, which is suspected of containing a bomb, should report it immediately. **Appendix B, Telephone Checklist For Bomb Threats**, should be available at all desks. The following persons should be contacted:

- Police Department - Call 911.
- Your Supervisor.
- After Hours - Call 911, then contact Building Security or the management representative on duty.
- Do not talk to anyone outside of Management. This should help to prevent panic among employees.

Emergency Actions

During bomb threats the Police Department may direct the facility to begin evacuations of specific floors or of the entire building. During bomb threat emergencies, these persons should communicate directly with management regarding details of the bomb threat and the necessity to evacuate. These persons are trained to respond appropriately and direct smooth evacuation when necessary.

Evacuations

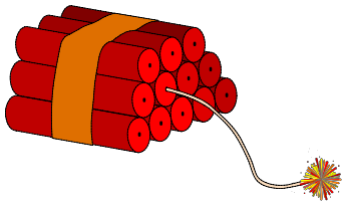
Local management or law enforcement officials should instruct employees if an evacuation becomes necessary. A runner should make evacuation notification if an evacuation is needed – do not use the PA system. The following guidelines should be followed during evacuations.

- **DO NOT USE ELEVATORS!** They should automatically return to the first floor in an alarm.
- Upon reaching the street level, exit and proceed to the designated assembly area. Keep the building area and sidewalks clear. Move 300 to 400 feet away from building and from flying glass.

Basic Bomb Threat Practices

The following precautions are designed to acquaint employee's tenants with useful information during search, discovery, and handling of "Suspected Bombs":

- Do not use radio equipment to transmit messages.
- Do not smoke.
- Do not accept the contents of any container as "genuine", simply because it was delivered by "routine means".
- Do not accept container markings and/or appearances as sole evidence of their content's identification and legitimacy.
- Do not touch, shake, carry, or disturb a "suspected bomb".
- Do not open or cut string/cord/wire attached to any suspicious container or object.
- Do not change the position of a suspicious container or bottle, or place the container into water.
- Do not go to public areas near or adjacent to our building(s).



Appendix A

EMERGENCY NUMBERS

AMBULANCE	
FIRE - RESCUE	
BUILDING/FACILITY	
MEDICAL CLINIC	
POLICE	
SECURITY	
CORPORATE CONTACT	

Appendix B

TELEPHONE CHECKLIST FOR BOMB THREATS

Basic Questions to be Answered and Asked:

Date of Call:	Time of Call:
Exact Statement of Threat	

Questions to ask:

What kind of bomb is it? _____

When is the bomb going to explode? _____

Where is the bomb right now? _____

Which floor/building? _____

What does it look like? _____

Who are you? _____

Where are you calling from? _____

Description of caller's voice:

⑨ Male	⑨ Female	⑨ Young	⑨ Middle Age	⑨ Older	⑨ Child
⑨ Sober	⑨ Drunk	⑨ Clear	⑨ Muffled	⑨ Calm	⑨ Accent

⑨ Speech Impediment Tone of Voice_____ Familiar voice _____

Other voice characteristics_____Who did it sc

Background Noises:

⑨ Music	⑨ Talk	⑨ Children	⑨ Traffic	⑨ Airplane
⑨ Machines	⑨ Typing	⑨ Buses	⑨ Other	

Call Received By:_____Phone # ___

1. PURPOSE

Welding, torch cutting, grinding, torch-applied roofing, soldering, and other forms of hot work create fire and health hazards. Most of these types of fires occur during alterations or repairs of existing buildings or equipment. This section is designed to establish and manage hot work projects.

2. RESPONSIBILITIES

1. Each facility should perform a hot work permit assessment to determine areas where welding, cutting and brazing are being performed.

2. It is the policy of this facility to communicate all hazards involved with cutting, welding or brazing to employees involved in those operations.

3. It will be the employee's responsibility to follow safe practices as outlined in this program.

4. The person in this facility assigned responsibility for this program is found on page 1-7, Site Specific Responsibilities.

Hot Work Permit Overview

The Occupational Safety and Health Administration (OSHA) require that before cutting or welding is permitted, the area should be inspected by the individual responsible for authorizing cutting and welding operations. They should designate precautions to be followed in granting authorization to proceed, preferably in the form of a written permit.

Fire hazards may occur in the use of both gas and electric welding, and in flame cutting. The majority of fires occur from the use of portable equipment. Outside contractors, performing repair and alteration work, are of particular concern since they may not be familiar with buildings or processes, and may not be supervised closely.

Both cutting and welding operations produce dangerous sparks. Sparks from cutting are more hazardous as they are more numerous, and are carried greater distances. Most fires start from drops, or globules, of hot slag. Smoldering fires, not apparent when the work is completed, may later burst into flame when no one is present.

Pre-Work Requirements:

- Equipment to be used should be in good condition.
- Suitable fire extinguishing equipment should be maintained in a state of readiness for instant use. Such equipment may consist of pails of water, buckets of sand, hose or portable extinguisher depending upon the nature and quantity of the combustible material exposed.
- Equipment should not be used within 35 feet of combustibles or if impracticable, combustibles should be protected with flame resistant covers or otherwise shielded with metal or flame resistant guards or curtains.
- If combustible materials such as paper clippings, wood shavings or solvent soaked rags are on the floor, the floor should be swept clean for a radius of 35 feet.
- Combustible materials should be kept wet, covered with damp sand, or protected by fire resistant shields. Employees operating arc welding or cutting equipment should be protected from possible shock.
- If necessary, a Fire Watch should be provided to watch for sparks or slag that may fall through cracks, doors or other openings.
- Firewatchers should have fire-extinguishing equipment readily available and be trained in its use.
- A Fire Watch should be maintained for at least a half-hour after completion of welding or cutting operations to detect and extinguish possible smoldering fires.
- When arc welding is to be suspended for any substantial period of time, such as during lunch or overnight, all electrodes should be removed from holders and the holders carefully located so that accidental contact cannot occur and the machine should be disconnected from the power source.
- Compressed gas cylinders should be secured at all times.
- Eye protection in the form of suitable goggles or face shields should be provided where needed for welding, cutting or brazing operations.

Management Responsibilities

Management should recognize its responsibility for the safe usage of cutting and welding equipment on its property and:

- Based on fire potentials of the facility, establish areas for cutting and welding, and establish procedures for cutting and welding in other areas.
- Insist that cutters or welders and their supervisors be suitably trained in the safe operation of their equipment and the safe use of the process.

Maintenance Responsibilities:

- Advise all contractors about flammable materials or hazardous conditions of which they may not be aware.
- Authorizing cutting and welding operations in areas not specifically designated for such process.
- Safe handling of the cutting or welding equipment and the safe use of the cutting or welding process.
- Determine the combustible materials and hazardous areas present or likely to be present in the work location.
- Protect combustibles from ignition by the following:
  - ¾ Have the work moved to a location free from dangerous combustibles.
  - ¾ If the work cannot be moved, have the combustibles moved to a safe distance from the work area or have the combustibles properly shielded from ignition.
  - ¾ Insure that cutting and welding are so scheduled that facility operations that might expose combustibles to ignition are not started during cutting or welding.
  - ¾ Require the cutter or welder to secure approval that conditions are safe before going ahead.
  - ¾ Determine that fire protection and extinguishing equipment are properly located at the site.
  - ¾ Where Fire Watches are required, ensure they are available at the site.

Permitting:

All welding, cutting and brazing in the facility should have a Hot Work Permit, see **Appendix B, Hot Work Permit**, completed (this permit or other acceptable permits) prior to beginning work. Copies of permits should be available and retained:

- The employee performing the cutting, welding or brazing operation should carry a copy of the permit.
- The Department Supervisor/Manager should retain the original copy of the permit.
- Permits should be closed at the end of each shift and renewed if the operation extends into a succeeding shift.

Alternatives to Hot Work

If the area cannot be made safe, use an alternative to hot work. Do not perform hot work when:

- Any processes involving flammable liquids or gases cannot be isolated and made safe
- Partitions, walls, ceilings or roofs have combustible coverings (e.g., wood and fabric)

- Piping or other metals can conduct enough heat to ignite nearby combustibles
- Large amounts of combustibles are impractical to move or cover, such as roll paper.

Outside Contractors

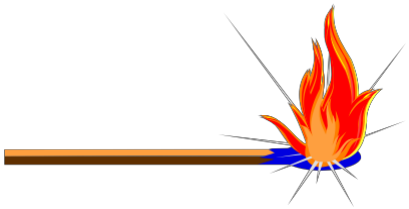
Contractors may not be familiar with our facility and fire hazards. Every contractor, before starting any hot work job, should be screened to ensure they have the experience to perform this work and adhere to our hot work program.

Recordkeeping

The Facilities Department should maintain hot work permits for 1 year after the permit is closed.

FIRE PREVENTION PROGRAM

COVENANT SERVICES has established the following fire prevention plan -as required by federal OSHA.



Elements of the Fire Prevention Program

- A list of the major workplace fire hazards
- Proper handling and storage procedures
- Identification of potential ignition sources (such as welding, smoking, and others) and their control procedures
- Type of fire protection equipment or systems
- Identification of personnel responsible for maintenance
- Identification of personnel responsible for control of fuel source
- Housekeeping

Each location management should designate a Safety Representative to confirm or modify **Appendix A, Workplace Fire Hazards**.

Automatic Sprinkler System

Any facility with an automatic sprinkler system should confirm that the system is being maintained in accordance with recognized standards (NFPA 25) or local ordinances. Fire sprinkler systems are tested and maintained by a licensed sprinkler contractor. Weekly visual inspections and monthly tests should be conducted by the facility management team. Records of all maintenance and inspection should be maintained. All sprinkler control valves should be locked and chained in the open position. Proper clearance should be maintained around all sprinkler control valves.

Ansul Systems

Ansul systems used to protect cooking equipment, fryers, surface burners, vent hoods positioned underneath vent hoods should be serviced by a licensed contractor every 6 months. The inspection tag should be attached to the pull station and extinguishing system tank.

Portable Fire Extinguishers

Monthly visual inspections should be conducted with the results documented on the safety inspection report. The on-site manager or designee should also perform periodic inspections of portable fire extinguishers. Annual inspections are conducted by a licensed fire extinguishing contractor. Damaged or discharged extinguishers should be replaced promptly. Any required testing, recharging and inspection are performed by outside contractors. These contractors should place a service tag on each fire extinguisher indicating the date of service.

All employees should be trained on using portable fire extinguishers. Training should include classification of fire, fire extinguisher types and proper operation of fire extinguishers.

Fire Drills

Fire drills should be conducted to acquaint all employees with emergency procedures and to judge the effectiveness of the plan. Each municipality has their own requirements for the frequency of fire drills and each of our locations should check with local officials to determine the minimum frequency for these drills. As a corporate minimum, each facility is required to perform one fire drill per year.

FLAMMABLE/COMBUSTIBLES LIQUID HANDLING

Flammable Liquids (gasoline, solvents, or other materials)

- Flammable liquids can be identified by labeling on the container and from the information on the Material Safety Data Sheets (MSDS).
- Only “safety cans” with spring closing lids and a flash arrestor may be used to store and dispense flammable liquids. Larger containers of liquids (such as 55-gallon drums) should be grounded and bonded prior to dispensing liquids into secondary safety containers.
- Flammable liquids should never be stored near a path to an exit or at an exit.

Combustible Materials (Paper, solvent soaked rags, wood)

- Combustible materials should be stored away from ignition sources and where there is sufficient fire suppression equipment or systems available.
- Combustible materials may not be stored under fire escape stairs or where the accumulation could interfere with a path to an exit or an exit.

Compressed Gases - LP Gas, Butane, Acetylene, Oxygen, Helium

- All compressed gas cylinders (helium, oxygen, etc.) should be stored upright and secured to prevent them from accidentally falling or being knocked over. Cylinders are under extremely high pressure and could rocket through vehicles and building walls if their valve stem was damaged in a fall.
- All cylinders not in use with a regulator attached should have their safety cap secured in place.
- If LP gas is stored, it should be on the exterior of the building in a secure area, away from ignition sources. Containers, full or empty, should be stored with the valve closed
- If Acetylene cylinders are used/stored, they should be stored at least 20 feet away from oxygen cylinders unless a 5-foot high wall with a 30-minute fire rating (i.e., concrete block) separates them. Acetylene cylinders should be secured to prevent falling at all times.
- Oxygen should never be stored near oil.

WORKPLACE FIRE HAZARDS

Appendix A

Fire Hazard	Control Activities
1. Smoking	Restricted to the exterior of the building.
2. Electrical Equipment	Over current protection on electrical circuits Limiting use of extension cords to temporary power needs Semi-annual inspections of work areas Three feet of clearance is maintained around all electrical switch equipment and disconnect boxes.
3. Flammable or Combustible Liquids	If stored, stored in appropriate safety containers
4. Compressed gases	If stored, stored upright and secured
5. Other chemicals	If stored or used, follow Material Safety Data Sheets for use and storage.
6. Cooking equipment	Limited to listed equipment in employee break areas only. Hot plates are not permitted.
7. Heating equipment	Limited to central or space equipment – portable heaters are not permitted. All heating equipment is serviced on a preventative maintenance schedule by outside contractors.
8. Material Storage	Good housekeeping procedures are followed at all facilities and verified during semi-annual inspections.
9. Trespassers	Security procedures are followed to limit visitor access during on and off hours.
10.	
11.	
12.	
13.	
15.	

APPENDIX B

HOT WORK PERMIT

The supervisor, in issuing this permit, certifies that all safety factors have been considered and cared for satisfactorily.

Return this permit upon completion of the job which it is to cover to the authorizing supervisor. The supervisor will write "complete", date and initial across the face of the permit.

AREA OF HOT WORK: _____

WORK TO BE DONE: _____

		YES	NO	N/A
1	Read the Hot Work Permit Procedure			
2	Work area and equipment has been made free of flammable, combustible, and hazardous materials.			
3	Gas Test taken.			
4	Is a fire extinguisher on the job?			
5	Smoke alarms covered?			
6	Lines disconnected and/or blanked?			
7	Is a fire watch provided?			
8	Adjoining equipment and operations considered ok from standpoint of possible effect on the job.			
9	Other necessary precautions SPECIFY			

APPROVAL

I have personally checked the conditions necessary and as specified I authorize this "Hot" work to begin.

APPROVED BY_____**DATE**_____**TIME**_____

HOT WORK PERMIT IS GOOD FOR_____**HOURS ONLY**

THIS PERMIT CAN BE ISSUED FOR ONLY ONE SHIFT. IT BECOMES VOID AT THE END OF WORK SHIFT DAY.

FIRE SAFETY INSPECTION APPENDIX C

QUARTERLY INSPECTION

DATE	QUARTERLY INSPECTION ITEMS	YES	NO	COMMENTS ON DEFICIENCIES
	ALARM DEVICES - SUPERVISION			
	FIRE DEPT. CONNECTIONS			
	VALVES – ALL TYPES			
	ALARM DEVICES			
	• SUPERVISION TEST			
	• FLOW ALARM TEST			
	• TAMPER ALARM TEST			
	MAIN DRAIN TEST			

ANNUAL INSPECTION/TEST

DATE	ANNUAL INSPECTION ITEMS	YES	NO	COMMENTS ON DEFICIENCIES
	PIPING & FITTINGS			
	SPRINKLER HEADS AND SPARE HEADS			

MONTHLY SYSTEM CONTROL VALVE & GAUGE INSPECTION

DATE	VALVE NUMBER	VALVE LOCATION	CONTROL VALVES			
			OPEN	SHUT	SECURED	GAUGE READINGS