

JOBSITE SAFETY & HEALTH MANUAL

Penn Fencing, Inc.

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INJURY & ILLNESS PREVENTION PROGRAM

Penn Fencing, Inc.

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TAB 1:

SAFETY & HEALTH
RESPONSIBILITIES, POLICIES, &
PROCEDURES

1.1 POLICY STATEMENT

It is Penn Fencing's belief that our employees are our most important asset and the preservation of employee Safety and Health must remain a constant consideration in every phase of our business. We will provide the resources necessary to manage, control, or eliminate all safety and health hazards.

All employees are responsible for working safely and productively, as well as recognizing and being aware of hazards in their work areas. Employees are also responsible for following safe work practices, including the use of Personal Protective Equipment (PPE) where necessary.

It is our belief that any safety and health program must have total employee involvement.

Therefore, this program has management's highest priority, support, and participation.

PRODUCTION IS NOT SO URGENT THAT WE CANNOT TAKE TIME TO PERFORM OUR WORK SAFELY.

Chad Galbreath - President

1.2 EMPLOYEE RESPONSIBILITIES

Although OSHA does not cite employees for violations of their responsibilities, each employee "shall comply with all occupational safety and health standards and all rules, regulations, and orders issued under the OSH Act that are applicable. Employee responsibilities and rights in states with their own occupational safety and health programs are generally the same as for workers in states covered by Federal OSHA. An employee should do the following:

- Read the OSHA Poster at the jobsite.
- Comply with all applicable OSHA standards.
- Follow all lawful employer safety and health rules and regulations, and wear or use prescribed protective equipment while working.
- Report hazardous conditions to the foreman.
- Report any job-related injury or illness to the employer, and seek treatment promptly.
- Exercise rights under the Act in a responsible manner.

I have read and understand my responsibilities under the OSHA standards and Penn Fencing's policies and procedures and agree to abide by them. I have also had the duties of the position which I have accepted explained to me, and I understand the requirements of the position. I understand that any violation of the above policies is reason for disciplinary action up to and including termination.

Employee Name (Print)

Employee Signature

Date

1.3 GOAL

Safety begins at the top and progresses downward throughout the company. The primary goal of Penn Fencing is to continue operating a profitable business while protecting employees from workplace-related injuries, illness or harm. This can be achieved in part by delegating responsibility and accountability to all involved in this company's operation as follows:

- **Responsibility:** Having to answer for activities and results.
- **Accountability:** The actions taken by management to ensure the performance of responsibilities.

In other words, to reach our goal of a safe workplace everyone needs to take responsibility and be held accountable.

Benefits of achieving our goals are:

- Minimizing of injuries and accidents
- Minimizing the loss of property and equipment
- Elimination of potential fatalities
- Elimination of potential permanent disabilities
- Elimination of potential OSHA citations and fines
- Reductions in workers' compensation costs
- Reductions in operating costs
- Having the best Safety and Health conditions possible in the workplace.

1.4 MANAGEMENT COMMITMENT

The management of Penn Fencing is committed to the company's safety policy, and providing direction and motivation by:

- Appointing a Safety Coordinator.
- Establishing company safety goals and objectives.
- Developing and implementing written Safety and Health programs.
- Ensuring total commitment to our Safety and Health programs.
- Facilitating employees' safety training.
- Establishing responsibilities for management and employees to follow.
- Ensuring that management and employees are held accountable for performance of their safety responsibilities.
- Establishing and enforcing disciplinary procedures for employees violating safety rules.
- Reviewing the Safety and Health program annually, and revising or updating as needed.

1.5 ASSIGNMENT OF RESPONSIBILITY

SAFETY COORDINATOR

Penn Fencing has designated: Matt Nebel as Safety Coordinator. The Safety Coordinator's office and cell phone numbers are:

Office: (724) 586-7906

Cell: (724) 612-9374

It is the duty of the Safety Coordinator to assist the foreman and all other levels of Management in the initiation, education, and execution of an effective safety program including the following:

- Introducing the safety program to new employees.
- Following up on recommendations, suggestions, etc., made at safety meetings. All topics of safety concerns must be documented accordingly.
- Assisting personnel in the execution of standard policies.
- Conducting safety inspections on a periodic basis.
- Addressing all hazards or potential hazards as needed.
- Performing accident investigations and preparing accident reports.
- Maintaining adequate stock of first aid supplies and other safety equipment to ensure their immediate availability.
- Making sure there is an adequate number of qualified first aid certified people on the work site.
- Becoming thoroughly familiar with OSHA regulations and local and state safety codes.
- Defining the responsibilities for safety and health of all subordinates and holding each person accountable for their results through the formal appraisal system and where necessary, disciplinary procedures.
- Emphasizing to employees that accidents create unnecessary personal and financial losses.

SUPERVISORS

The supervisors are responsible for establishing an operating atmosphere that ensures that safety and health is managed in the same manner and with the same emphasis as production, cost, and quality control.

- Regularly emphasizing that accident and health hazard exposure prevention are not only moral responsibilities, but also a condition of employment.
- Identifying operational oversights that could contribute to accidents which often result in injuries and property damage.
- Participating in safety and health related activities, including routinely attending safety meetings, reviews of the facility, and correcting employee behavior that can result in accidents and injuries.
- Spending time with each person hired to explain the hazards and safety policies relating to his/her particular work.
- Ensuring that initial orientation of "new hires" is carried out by the Safety Coordinator.

- Making sure that, if a “Competent Person” is required, one is present to oversee operations and instruct employees when necessary.
- Never short-cut safety for expediency, nor allow workers to do so.
- Enforcing safety rules consistently, and following company's discipline and enforcement procedures.
- Conducting a daily, jobsite safety inspection and correcting noted safety violations.

EMPLOYEES

It is the duty of each and every employee to know the safety rules, and conduct his work in compliance with these rules. Disregard of the safety and health rules shall be grounds for disciplinary action up to and including termination. It is also the duty of each employee to make full use of the safeguards provided for their protection. Every employee must receive an orientation when hired and receive a review of the company's Safety and Health Program. Employee responsibilities include the following:

- Reading, understanding and following safety and health rules and procedures.
- Signing the Policies and Procedures Acknowledgement (see form above).
- Wearing Personal Protective Equipment (PPE) at all times when working in areas where there is a possible danger of injury.
- Wearing suitable work clothes as determined by the foreman.
- Performing all tasks safely as directed by their foreman.
- Reporting ALL injuries, no matter how slight to their foreman immediately, and seeking treatment promptly.
- Knowing the location of first aid, firefighting equipment, SDS log, and other safety devices.
- Attending any and all required safety and health meetings.
- Not performing potentially hazardous tasks, or using any hazardous material until properly trained, and following all safety procedures when performing those tasks.
- Stopping and asking questions if ever in doubt about the safety of any operation

COMPETENT PERSON

All jobsites must have a designated Competent Person who is responsible for the implementation and monitoring of the Penn Fencing health and safety plan. The Competent Person must be capable of identifying existing and predictable hazards and have the authority to take prompt corrective measures.

1.6 STOP WORK AUTHORITY

As part of the Penn Fencing health & safety policy, it is the responsibility of every employee performing work for Penn Fencing to exercise this Stop Work Authority Policy whenever any person in the work area is at risk of injury. Penn Fencing strives to provide a culture where this Stop Work Authority program is exercised freely.

Key elements of this program include:

- Employees will receive Stop Work Authority training before initial assignment. Training will be documented including the employee's name, the dates of training, and the subject.
- Employees have the authority and obligation to stop any task or operation where concerns or questions regarding the control of health & safety may exist.
- Employees are responsible to initiate a Stop Work intervention when warranted and management is responsible to create a culture where Stop Work Authority is exercised freely
- Employees will not face any form of retribution or intimidation directed at any individual or company for exercising their right to issue a stop work authority.
- This Stop Work Authority program will be executed in a positive manner.

The following procedure must be initiated whenever an unsafe condition is identified:

- The Stop Work Intervention will be initiated and coordinated through the supervisor
- All affected personnel and supervision will be notified of the Stop Work Issue
- Once work has been stopped, no work may resume until all stop work issues and concerns have been adequately addressed.
- Work may resume only when it has been deemed safe to continue
- After the Stop Work Intervention has been initiated and closed, a follow-up will be completed to assess the effectiveness of the program.

Stop Work Issuance Documentation

- A Stop Work Issuance document will be completed to document the circumstances leading to the Stop Work Intervention.
- Stop Work reports will be reviewed by supervision in order to measure participation, determine quality of interventions and follow-up, trend common issues, identify opportunities for improvement, and facilitate sharing of learning

Stop Work Report

Section 1: Stop Work Issuance			
Location of operation		Date / time	
Supervisor		Phone	
Individual initiating stop work			
Individual performing work			
Work operation or condition (include names of individuals performing work)			
Hazard (as stated by individual initiating stop work)			
Additional observations			
Section 2: Date / Time Informed			
Supervisor		Directorate ESH coordinator	
Building / area manager		Associate laboratory director	
Division / department head		Chief safety officer	
Facility manager			
Section 3: Follow-up Action			
Section 4: Restart Concurrence			
Supervisor		Date	
Owner Client		Date	
Section 5: Restart Authorization			
General		Date	
Section 6: Restart Release			
Owner Client		Date	

1.7 OSHA MULTI-EMPLOYER WORKSITE POLICY

On multi-employer worksites, more than one employer may be citable for a hazardous condition that violates an OSHA standard. The following explains how OSHA views multi-employer worksites.

- **THE CREATING EMPLOYER:** The employer that caused the hazardous condition that violates an OSHA standard. Employers must not create conditions that violate OSHA standards. Any employer that does so is citable, even if the only employees exposed are those of other employers at the site.
- **THE EXPOSING EMPLOYER:** The employer whose own employees are exposed to the hazard. Exposure could be observed by an inspector or unobserved (but determined through witness statements or other evidence). In addition, citations may be issued when the possibility exists that an employee could be exposed to a hazard because of work patterns, past circumstances, or anticipated work requirements.
- **THE CORRECTING EMPLOYER:** An employer who is engaged in a common undertaking as the exposing employer, and is responsible for correcting the hazard. This usually occurs where an employer is given the responsibility of installing and/or maintaining particular safety/health equipment or devices. The correcting employer must exercise reasonable care in preventing and discovering violations and meet its obligations of correcting the hazard.
- **THE CONTROLLING EMPLOYER:** An employer who has general supervisory authority over the worksite, and has the power to correct safety and health violations or require others to correct them. Control can be established by contract or, in the absence of explicit contractual provisions, by the exercise of control in practice. A controlling employer must exercise reasonable care to prevent and detect violations on the site. The extent of the measures that a controlling employer must implement to satisfy this duty of reasonable care is less than what is required of an employer with respect to protecting its own employees. This means that the controlling employer is not normally required to inspect for hazards as frequently or to have the same level of knowledge of the applicable standards or of trade expertise as the employer it has hired.

If the employer falls into one of these categories, they have obligations with respect to OSHA requirements. OSHA inspectors must determine if employer actions are sufficient to meet those obligations. The extent of the actions required of employers varies based on which category applies. Note that the extent of the measures that a controlling employer must take to satisfy its duty to exercise reasonable care to prevent and detect violations is less than what is required of an employer with respect to protecting their own employees.

1.8 SAFETY RULES AND PROCEDURES

The following safety rules & procedures have been set forth by Penn Fencing as minimum guidelines. If a situation arises that there is not a pre-established rule, the employee is expected to take all precautions and measures available to them to act in a safe manner.

- No employee is expected to undertake a job until that person has received adequate training.
- All employees shall be trained on potential hazards that they could be exposed to and how to protect themselves.
- No employee is required to work under conditions which are unsanitary, dangerous or hazardous to their health.
- Only qualified, trained personnel are permitted to operate machinery or equipment.
- All injuries must be reported to your supervisor.
- Manufacturer's specifications /limitations /instructions shall be followed.
- Particular attention should be given to new employees and to employees moving to new jobs or doing non-routine tasks.
- All OSHA posters shall be posted.
- Emergency numbers shall be posted and reviewed with employees
- Employees working in areas where there is a possible danger of head injury, excessive noise exposure, or potential eye and face injury shall be protected by Personal Protection Equipment (PPE).
- All hand and power tools and similar equipment, whether furnished by the employer or the employee, shall be maintained in a safe condition.
- All materials stored in tiers shall be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.
- Electrical equipment must be free from recognized hazards that are likely to cause death or serious physical harm to employees.
- All places of employment shall be kept clean, the floor of every workroom shall be maintained, so far as practicable, in a dry condition; standing water shall be removed. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats or other dry standing places or appropriate waterproof footwear shall be provided.
- To facilitate cleaning, every floor, working place, and passageway shall be kept free from protruding nails, splinters, loose boards, and holes and openings.
- All floor openings, open sided floor and wall openings shall be guarded by standard railings and toe boards or cover.
- The employer shall comply with the manufacturer's specifications and limitations applicable to the operation of any and all cranes and derricks.
- All equipment left unattended at night, adjacent to a highway in normal use, or adjacent to construction areas where work is in progress, shall have appropriate lights or reflectors, or barricades equipped with appropriate lights or reflectors, to identify the location of the equipment.

- No construction loads shall be placed on a concrete structure or portion of a concrete structure unless the employer determines, based on information received from a person who is qualified in structural design, that the structure or portion of the structure is capable of supporting the loads.
- A stairway or ladder shall be provided at all personnel points of access where there is a break in elevation of 19 inches or more, and no ramp, runway, sloped embankment, or personnel hoist is provided.

1.9 DISCIPLINARY POLICY

Penn Fencing's disciplinary policy is comprised of a corrective action process aimed to document and correct undesirable employee behavior, including violations of safety rules. The safety coordinator, supervisors, and management are responsible for enforcement of this disciplinary policy.

Major elements of this policy include:

- Physical inspections by company officials indicating violations showing overall lack of commitment to company safety goals shall be under the same level of disciplinary actions.
- Constructive criticism/instruction by the supervisor to educate and inform employees of appropriate safety performance and behavior.
- Correcting employee's negative behavior to the extent required.
- Informing the employee that continued violation of company safety policies may result in termination.
- Written documentation of disciplinary warnings and corrective action taken.

Safety violations include, but are not limited to:

- Not following safety procedures, guidelines or rules
- Horse play
- Failure to wear selected PPE
- Abuse of selected PPE

Depending on the facts and circumstances involved with each situation, the company may choose any corrective action including immediate termination. However, in most circumstances the following steps will be followed:

1. **Verbal Warning** informally documented (note to project or supervisor file), by a supervisor or safety coordinator for minor infractions of company safety rules. A supervisor or safety coordinator must inform the employee what safety rule or policy was violated and how to correct the problem.
2. **Written Warning**, documented in employee's file. Repeated minor infractions or a more substantial safety infraction requires issuance of a written warning. Every attempt should be made to re-educate the employee on the desired performance. The employee should acknowledge the warning by signing the document before it is placed in their personnel file.
3. **Suspension** for three (3) working days. If employee fails to appropriately respond or management determines the infraction is sufficiently serious.
4. **Termination** for repeated or serious safety infractions.

DISCIPLINARY ACTION FORM

Employee Name: _____

Employee Job Title: _____

Supervisor Name: _____

Today's Date: _____

Date/Time of Incident:	Location:
Description of incident:	
Witnesses if any:	
Policy/Policies violated:	
Disciplinary action to be taken:	
Consequence(s) if employee repeats this offense:	
If the employee has offered an explanation of his/her conduct, detail explanation here:	

I have read the above, and I understand the consequences if I repeat my offense.

Signature of Employee

Date

Signature of Supervisor

Date

1.10 SUBCONTRACTOR MANAGEMENT PLAN

At a minimum, Penn Fencing requires that other employers under their control be pre-qualified. Subcontractors must identify, provide, and/or implement the following for review:

- A health & safety program, including written procedures for controlling job-related hazardous operations such as cranes, scaffolding, trenches, confined space, hot work, explosives, hazardous materials, leading edges, etc.
- A safety coordinator and competent person
- A project safety analysis for the job
- List of work activities requiring planning, design, inspection, or supervision by an engineer, competent person, or other professional
- Documentation for required health & safety training
- Signed independent contractor agreement
- Hazardous chemicals to which jobsite workers may be exposed to while in the workplace along with SDSs, measures to minimize the possibility of exposure, and procedures to follow if workers are exposed
- An emergency response plan
- Other documentation such as permits, hazard reports, inspections, uncorrected hazards, accident/incident/near miss reports, etc.
- Safety statistics

Penn Fencing will utilize the submitted documents to analyze the subcontractor's safety metrics to determine which subcontractors will be utilized. Subcontractors must submit a signed copy of the subcontractor agreement on the following page to document subcontractor responsibility for OSHA compliance.

Subcontractors are expected to participate in pre-job, tailgate, and safety meetings. They will also be included in job safety analyses, hazard assessments, and job safety inspections. Post-job safety performance reviews will be conducted to analyze the performance.

Subcontractor Prequalification Form

Company Information				
Legal Company Name				
Address:				
City, State, Zip				
Federal ID #				
Contact Person				
Telephone				
Fax				
Email				
Safety Performance Statistics				
	<u>Current</u>	<u>Last Year</u>	<u>2 Years</u>	<u>3 Years</u>
Experience Modification Rating (EMR)				
Average number of employees				
Hours worked				
# of Recordable cases				
(G) # of deaths				
(H) # of cases with days away from work				
(I) # cases with job transfer or restriction				
(J) # other recordable cases				
(K) # of days away from work				
(L) # days on job transfer or restriction				
3-year Total Recordable Incidence Rate (TRIR)			$\frac{\text{(Total \# of cases for all 3 years)} \times 200,000}{\text{Total number of employee hours for all 3 years}}$	

Safety Questionnaire	
Does your company have a written safety program? If yes, please attach as PDF or .doc file	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does your company perform safety training for all employees? If yes, is documentation available?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Does your company have a new hire orientation process for all new hires?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Do you hold safety meetings? If yes, how frequently?	<input type="checkbox"/> Yes <input type="checkbox"/> No _____
OSHA Inspections	
Have you had an OSHA inspection in the past 5 years? If yes, were you issued citations?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
Please provide any additional details regarding citations issued:	
Certification	
Name:	
Signature:	
Title	
Date	

Subcontractor Agreement

_____ (Company Name) hereby acknowledges that they are a subcontractor of Penn Fencing, and therefore agrees to comply with all local, state, and federal laws and regulations, along with policies and procedures that have been established by Penn Fencing.

It is further understood that in the event of an OSHA site inspection, as related to the work that is being performed, it is the responsibility of _____ (Company Name) to immediately correct any safety violations and/or pay any fines that may be levied by OSHA for safety violations.

Agreed by (Print): _____

Signature: _____

Date: _____

1.11 SHORT SERVICE EMPLOYEE PROGRAM

This Short Service Employee (SSE) Policy ensures that employees with less than 6 months' experience are identified, adequately supervised, trained, and managed so as to prevent injury to themselves or others, property damage, or environmental harm.

The key elements of this program are as follows:

- Before beginning any work for Penn Fencing, all new employees (including SSE) will receive new hire safety training. Documentation of training can be found at the end of each written safety and health program.
- Prior to the job mobilization, contractors will communicate/notify the project coordinator, contractor contact, or on-site supervisor for all jobs containing SSE personnel. The project coordinator, contractor contact, or on-site supervisor will determine approval status of the crew makeup.
- Contractors shall monitor employees, including SSE personnel, for HES awareness.
 - If, at the end of the six-month time period, the SSE has worked safely, adhered to HES policies and has no recordable incident attributed to him/her, the SSE identifier may be removed at the supervisor's discretion.
 - Any employee that does not complete the designated time period recordable free to get operator approval in writing prior to returning to operator property.
- Each SSE is designated an applicable mentor. The mentor is responsible for providing guidance and development to the SSE. A mentor can only be assigned one SSE per crew and the mentor must be onsite with the SSE to be able to monitor the SSE.
- Non-SSE employees who are new to a location will be considered by the location supervisor for inclusion in the SSE program based on the specifics of their assignment. Factors to consider include significant differences in:
 - job responsibilities/duties from previous assignments,
 - work processes/practices from previous assignments,
 - equipment/tools from previous assignments, and
 - skill level, familiarity with co-workers.
- Subcontractors must adhere to the requirements of the SSE program.

SSE Visibility

SSE personnel shall be visibly identified in the field by wearing:

- High-visibility orange colored hard hats or
- Visible hard hat stickers with the letters "SSE". The sticker shall be of contrasting color to the hardhat and be at least 2" x 3" in size

Mentor Roles and Responsibilities:

- SSE Mentor shall be responsible for overseeing Orientation, Training and Observation of SSE during first six months of employment. Mentor will Coach and supervise work. The SSE's safety will be of highest priority while learning the new job and unfamiliar tasks.
- SSE shall Consult with and listen to Mentor, and will be responsible for performing work as directed, but always has the responsibility to speak up when and if work is deemed unsafe.

Removal from SSE Status

To be removed from SSE status, an employee must exhibit safe behavior for 6 months (e.g. incident free performance, proactive participation in HSE programs such as incident reporting including near misses, BBS, JHA development, safety meetings) and have a general awareness and working knowledge of the Penn Fencing and contractor's HSE policies.

Penn Fencing may recommend a reduction of the 6-month requirement based on the employee's performance and relevant industry experience. This reduction must be approved by the location supervisor. Documentation shall be maintained for a period of 1 year after a contractor employee has been removed from SSE status.

1.12 JOB COMPETENCY

Before an employee is permitted to work independently, a supervisor must verify that the employee is competent to perform their roles and responsibilities. Job specific training must be provided for new or transferred employees. All employees must be trained on the tasks they perform on a regular basis.

The minimum qualifications required for performing each job duty including a combination of education and work experience has been established. Upon hire or job transfer, the employee must provide documentation that they are qualified to perform their job duties. Copies of documentation will be maintained in employee files.

An organizational chart or list of the job titles/ roles in the company has been established and is available to any employee upon request.

1.13 FIT FOR DUTY SCREENING

To ensure that employees are physically capable of performing their job function, pre-employment physicals should be included in the hiring process and also when changing into certain job functions and different environments. As part of the new hire training process, employees will receive training specific to their assigned task. Drug and alcohol testing may be conducted for pre-employment, post-accident, or randomly as prescribed by the DOT or host facility.

Safe work programs and procedures have been implemented including, but not limited to:

- Hazard Communications
- Lockout/Tagout
- Electrical Safety
- Respiratory Protection
- Forklift safety
- Emergency Action Plan
- Fire safety
- Hot Work
- Fall Protection

Employees must report all medications they are taking. Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor. Employee's activities and behaviors will be monitored to determine if employee should be removed from the work site.

Employees must be responsible for ensuring they are physically and mentally fit to perform their job functions safely. Employees must take responsibility for their own safety as well as not reporting to work in a condition as to endanger the safety of their fellow workers.

1.14 OSHA INSPECTION GUIDELINES

SUPERVISOR

- Ask to see the OSHA inspector(s) official government identification
- Contact the appropriate Company official immediately
- Name of the authorized Company official: _____
- Office phone : _____ Extension: _____
- Cell phone: _____
- Ask the OSHA inspector(s) to wait until the representative above has been reached.

Note: “The inspection shall not be delayed unreasonably to await the arrival of the employer representative. This delay should not exceed one hour.” (*OSHA Field Inspection Reference Manual*, Section 6, Chapter II, A 2.b. (2))

COMPANY REPRESENTATIVE:

- Contact Lancaster Safety Consulting Inc. at (888) 403-6026 if you desire. A Lancaster Safety consultant can speak with the OSHA official(s) by phone for the purpose of providing an overview of your occupational health and safety program.
- After meeting the OSHA official(s), an opening conference (sit-down meeting) shall be held. The OSHA official(s) should explain the basis of the inspection, (Accident investigation, complaint, referral, follow-up, or planned local/national emphasis program). You should be advised if the inspection is partial or complete. The opening conference is an important opportunity for the employer to demonstrate the company’s “Good Faith” efforts to provide a safe workplace. Discuss safety policies and practices with the compliance officer(s). Present the safety manuals. Emphasize the worker training verification logs, and your new hire training procedures. You should also present OSHA 300 logs, safety committee paperwork, and any other written materials that demonstrate your company’s “Good Faith” efforts to comply with the applicable OSHA standards.
- Upon completion of the opening conference, accompany the OSHA inspector(s) on a walk-through inspection of your facility. (Advise the inspector(s) on any areas of your facility that have been predetermined as “trade secret” areas, if applicable). During this walk-through, the inspector(s) will advise you of potential health and safety violations. If possible, take immediate, corrective action to correct hazards while the inspector(s) are present. NOTE: The inspector(s) have the right to interview workers.
- After the walk-through, a closing conference shall be held. The inspector(s) will provide an overview of their findings, and advise you if citations are likely to be issued. (No citations are issued on the same day of an OSHA inspection. OSHA has up to 6-months to issue citations.) The closing conference provides the employer with another opportunity to demonstrate “good faith”. Take notes on the inspector(s) closing comments.
- Contact Lancaster Safety Consulting, Inc. at **(888) 403-6026** upon conclusion of the inspection.

1.15 LONE WORKERS

In order to identify control measures necessary to minimize risk associated with lone workers, Penn Fencing will complete a hazard assessment of the task at hand. Emergency contact names and numbers will be pre-determined.

While working alone, employees must carry a cellular phone or electronic monitoring device at all times along with a back-up form of communication. The individual must make frequent communication with the contact or be monitored at regular intervals via the electronic monitoring device.

In the event that a lone worker has lost communication with his/her contact, a designated company employee will physically check on the lone worker. If the lone worker is more than 10 miles from another employee, or cannot be physically located, the employer must contact local officials to assemble a search.

TAB 2:

INJURY & ILLNESS REPORTING &
PREVENTION

2.1 ACCIDENT INVESTIGATION

Thorough accident investigations will help to determine why accidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing and controlling hazards and potential accidents. All incidents will be investigated to the appropriate level with regards to incident severity using a root cause analysis process or other similar method.

When an incident occurs, the following sequence of reporting events will be followed:

1. If medical attention is required, call 911 or alert the first responder
2. Alert the supervisor on site
3. Alert all personnel necessary to control further loss
4. Report all fatalities to OSHA within 8 hours of the incident.
5. Report all work-related inpatient hospitalizations, amputations, or losses of an eye to OSHA within 24 hours of the incident.
6. If working at another company's location, report all incidents to the owner client within 24 hours of the incident.

After an incident has occurred, proper actions must be taken to prevent further loss. Proper equipment to assist in conducting an incident investigation will be available to persons responsible for conducting the investigation.

Individual responsibilities for incident investigation must be assigned prior to the occurrence of an incident. Personnel are trained in their roles and responsibilities for incident response and investigation techniques. Employees who are assigned the role of first responder must be trained and qualified in first aid techniques to control the degree of loss during the immediate post-incident phase.

SUPERVISORS

- Provide first aid, call for emergency medical care if required.
- If further medical treatment is required, arrange to have an employer representative accompany the injured employee to the medical facility.
- Secure area, equipment and personnel from injury and further damage.
- Contact Safety Coordinator.

SAFETY COORDINATOR

- Investigate, identify, and document all of the evidence involved with the incident. Collect, preserve, and secure all facts, employee and witness statements; take pictures and physical measurements of incident site and equipment involved.
- Complete an incident investigation report form (see following pages), a detailed narrative, and the necessary workers' compensation paperwork within 24 hours whenever possible.
- Ensure that corrective action to prevent a recurrence is taken, assign responsibilities for corrective actions, and track the corrective actions to closure.

- Discuss incident, where appropriate, in safety and other employee meetings with the intent to prevent a recurrence.
- Discuss incident with the supervisor and other management.
- If the injury warrants time away from work, insure that the absence is authorized by a physician and that you maintain contact with your employee while he/she remains off work.
- Monitor status of employee(s) off work, maintain contact with employee and encourage return to work even if restrictions are imposed by the physician.
- When injured employee(s) return to work they should not be allowed to return to work without “return to work” release forms from the physician. Review the release carefully and ensure that you can accommodate the restrictions, and that the employee follows the restrictions indicated by the physician.

Documentation of the incident is an important step in preventing future occurrences. Gathering facts, witness statements, and taking photos and sketches of the accident site provides a solid base to begin the review process. Once all documentation is gathered and the accident report has been written, management will assess the results, and place any necessary changes to processes into effect to prevent a reoccurrence of similar events. Any lessons learned and changes to processes will be communicated to employees.

Accident/Incident Investigation Form

Date/Time of Incident:		Jobsite:		
Injured Person				
Name:		Title:		
Address:		Hire Date:		
		Length of time in current position:		
Phone:		Supervisor:		
Employee Classification: <input type="checkbox"/> Full Time <input type="checkbox"/> Part Time <input type="checkbox"/> Contract <input type="checkbox"/> Temporary				
Description of Injury:				
Nature of Injury/Injured Part of Body:				
<input type="checkbox"/> Bruising <input type="checkbox"/> Dislocation <input type="checkbox"/> Strain/Sprain <input type="checkbox"/> Scratch/Abrasion <input type="checkbox"/> Internal <input type="checkbox"/> Fracture <input type="checkbox"/> Foreign Body <input type="checkbox"/> Laceration/Cut <input type="checkbox"/> Burn/Scald <input type="checkbox"/> Chemical Reaction <input type="checkbox"/> Amputation <input type="checkbox"/> Death <input type="checkbox"/> Other (describe): _____				
Treatment Provided:				
<input type="checkbox"/> First Aid - If First Aid was provided, please indicate the treatment performed: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> <input type="radio"/> non-prescription medications at nonprescription strength <input type="radio"/> tetanus immunizations <input type="radio"/> cleaning, flushing, or soaking wounds on the skin surface <input type="radio"/> wound coverings <input type="radio"/> hot or cold therapy <input type="radio"/> using totally non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. <input type="radio"/> using finger guards; <input type="radio"/> using massages; <input type="radio"/> using eye patches; </td> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> <input type="radio"/> drinking fluids to relieve heat stress drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters; <input type="radio"/> temporary immobilization devices while transporting an accident victim (splints, slings, neck collars, or back boards). <input type="radio"/> simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye; <input type="radio"/> irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas other than the eye; </td> </tr> </table>			<ul style="list-style-type: none"> <input type="radio"/> non-prescription medications at nonprescription strength <input type="radio"/> tetanus immunizations <input type="radio"/> cleaning, flushing, or soaking wounds on the skin surface <input type="radio"/> wound coverings <input type="radio"/> hot or cold therapy <input type="radio"/> using totally non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. <input type="radio"/> using finger guards; <input type="radio"/> using massages; <input type="radio"/> using eye patches; 	<ul style="list-style-type: none"> <input type="radio"/> drinking fluids to relieve heat stress drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters; <input type="radio"/> temporary immobilization devices while transporting an accident victim (splints, slings, neck collars, or back boards). <input type="radio"/> simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye; <input type="radio"/> irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas other than the eye;
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<input type="checkbox"/> Emergency Room <input type="checkbox"/> Physician's Office <input type="checkbox"/> Hospitalization	Treating Physician/Facility:			
	Address			

Description of Incident:

What was the employee doing just before the incident occurred? Describe the activity, as well as the tools, equipment or material the employee was using. Be specific. Examples: "climbing a ladder while carrying roofing materials"; "spraying chlorine from hand sprayer"; "daily computer key-entry."

What happened? Tell how the injury occurred. Examples: "When ladder slipped on wet floor, worker fell 20 feet"; "Worker was sprayed with chlorine when gasket broke during replacement"; "Worker developed soreness in wrist over time."

What object or substance directly harmed the employee? Examples: "concrete floor"; "chlorine"; "radial arm saw." If this question does not apply to the incident, leave it blank.

Other Relevant Information (attach photos, sketch of incident scene, etc.):

Root Cause Analysis (check all that apply)

<p>Conditions:</p> <input type="checkbox"/> Unsafe Conditions <input type="checkbox"/> Poor work area design or layout <input type="checkbox"/> Congested work area <input type="checkbox"/> Hazardous substances <input type="checkbox"/> Fire or explosion hazard <input type="checkbox"/> Inadequate ventilation <input type="checkbox"/> Slippery conditions <input type="checkbox"/> Excessive noise <input type="checkbox"/> Improper material storage <input type="checkbox"/> Improper loading or placement	<p>Work Practices</p> <input type="checkbox"/> Improper work technique <input type="checkbox"/> Improper PPE or PPE not used <input type="checkbox"/> Hazards not identified <input type="checkbox"/> Guards not used <input type="checkbox"/> Improper lifting <input type="checkbox"/> Poor housekeeping <input type="checkbox"/> Servicing machinery in motion <input type="checkbox"/> Inadequate workplace inspection <input type="checkbox"/> Improper tool or equipment <input type="checkbox"/> Improper maintenance <input type="checkbox"/> Defective tools/equipment	<p>Disciplinary Infraction:</p> <input type="checkbox"/> Lack of written procedures or policies <input type="checkbox"/> Operating without authority <input type="checkbox"/> Safety rules not enforced <input type="checkbox"/> Safety rule violation <input type="checkbox"/> Operating at improper speeds <input type="checkbox"/> Horseplay <input type="checkbox"/> Drug or alcohol use <input type="checkbox"/> Unsafe act of others <input type="checkbox"/> By-passing safety devices <input type="checkbox"/> Unsafe Acts
<p>Planning & Training</p> <input type="checkbox"/> PPE unavailable <input type="checkbox"/> Failure to warn or secure <input type="checkbox"/> Inadequate job planning <input type="checkbox"/> Inadequate guarding of hazards <input type="checkbox"/> Inadequate equipment <input type="checkbox"/> Unsafe design or construction <input type="checkbox"/> Insufficient lighting <input type="checkbox"/> Inadequate fall protection	<input type="checkbox"/> Poor process design Insufficient worker training <input type="checkbox"/> Insufficient foreman training <input type="checkbox"/> Insufficient knowledge of job <p style="margin-left: 20px;">Management Deficiencies</p> <input type="checkbox"/> Inadequate supervision <input type="checkbox"/> Inadequate hiring practices <p style="margin-left: 20px;">Unrealistic scheduling</p> <input type="checkbox"/> Unnecessary haste	<p>Other:</p> <input type="checkbox"/> _____ <input type="checkbox"/> _____

Corrective Actions

Contributing Factor	Corrective Action	Responsible Party	Completion Date

Lessons Learned

--	--

Initial Report Completed by:

Printed Name:

Date:

Signature:

Job Title:

Management Review:

Printed Name:

Date:

Signature:

Job Title:

Final Review:

I certify that all Corrective Actions have been completed.

Printed Name:

Date:

Signature:

Job Title:

2.2 NEAR MISS REPORTING

A near miss is similar to an accident; however, a near miss does not result in an injury or property damage. No matter how trivial they are, near misses should be reported to the supervisor in the same manner as accidents are reported. Reporting near misses in a timely manner can help to determine how to prevent a recurrence that could result in a serious injury.

Nothing is learned from unreported near misses. Hazards, causes and contributing factors are lost if not reported. Employees who do not take the time to report near misses they experience may not learn from them and neither will others who were not involved. The fact that many near misses come within inches of being disabling injury accidents makes failing to report them all the more serious.

Reasons that employees typically do not report near misses:

- Fear of supervisor's disapproval
- Production time
- Desire to not have the near miss documented on the employee's records
- Embarrassment from coworkers' ridicule or sarcasm
- Failure to understand the importance of near miss reporting
- Inability to recognize the damage that could have resulted

Important questions to ask when investigating a near miss include:

- What are the circumstances surrounding the near miss?
- Is there a safety rule covering the situation?
- If so, did the person involved know the rule?
- Were any safety devices or PPE/clothing not used or used incorrectly?
- Have there been other near misses of the same type?
- Was the employee aware of the hazard?
- Did the employee know the safe and proper procedure?

Taking the opportunity to report near misses can mean a much safer and healthier work environment for you and your coworkers and can also mean going home as you came in, in one piece! Employees are required as part of their job duties to report all near misses to their supervisor.

Root Cause Analysis (check all that apply)

<p>Conditions:</p> <input type="checkbox"/> Unsafe Conditions <input type="checkbox"/> Poor work area design or layout <input type="checkbox"/> Congested work area <input type="checkbox"/> Hazardous substances <input type="checkbox"/> Fire or explosion hazard <input type="checkbox"/> Inadequate ventilation <input type="checkbox"/> Slippery conditions <input type="checkbox"/> Excessive noise <input type="checkbox"/> Improper material storage <input type="checkbox"/> Improper loading or placement	<p>Work Practices</p> <input type="checkbox"/> Improper work technique <input type="checkbox"/> Improper PPE or PPE not used <input type="checkbox"/> Hazards not identified <input type="checkbox"/> Guards not used <input type="checkbox"/> Improper lifting <input type="checkbox"/> Poor housekeeping <input type="checkbox"/> Servicing machinery in motion <input type="checkbox"/> Inadequate workplace inspection <input type="checkbox"/> Improper tool or equipment <input type="checkbox"/> Improper maintenance <input type="checkbox"/> Defective tools/equipment	<p>Disciplinary Infraction:</p> <input type="checkbox"/> Lack of written procedures or policies <input type="checkbox"/> Operating without authority <input type="checkbox"/> Safety rules not enforced <input type="checkbox"/> Safety rule violation <input type="checkbox"/> Operating at improper speeds <input type="checkbox"/> Horseplay <input type="checkbox"/> Drug or alcohol use <input type="checkbox"/> Unsafe act of others <input type="checkbox"/> By-passing safety devices <input type="checkbox"/> Unsafe Acts
<p>Planning & Training</p> <input type="checkbox"/> PPE unavailable <input type="checkbox"/> Failure to warn or secure <input type="checkbox"/> Inadequate job planning <input type="checkbox"/> Inadequate guarding of hazards <input type="checkbox"/> Inadequate equipment <input type="checkbox"/> Unsafe design or construction <input type="checkbox"/> Insufficient lighting <input type="checkbox"/> Inadequate fall protection	<input type="checkbox"/> Poor process design Insufficient worker training <input type="checkbox"/> Insufficient foreman training <input type="checkbox"/> Insufficient knowledge of job <input type="checkbox"/> Management Deficiencies <input type="checkbox"/> Inadequate supervision <input type="checkbox"/> Inadequate hiring practices <input type="checkbox"/> Unrealistic scheduling <input type="checkbox"/> Unnecessary haste	<p>Other:</p> <input type="checkbox"/> _____ <input type="checkbox"/> _____

Corrective Actions

Contributing Factor	Corrective Action	Responsible Party	Completion Date

Lessons Learned

--	--

Initial Report Completed by:

Printed Name:

Date:

Signature:

Job Title:

Management Review:

Printed Name:

Date:

Signature:

Job Title:

Final Review:

I certify that all Corrective Actions have been completed.

Printed Name:

Date:

Signature:

Job Title:

2.3 EMPLOYEE ACCESS TO MEDICAL RECORDS

The purpose of this program is to provide employees with information of their right to access relevant exposure records to toxic substances or harmful physical agents in their workplace. Under OSHA's standard, Access to Employee Exposure and Medical Records (1910.1020) all employees have the right to obtain these records to prevent or identify potential occupational illnesses. Employees have the right to obtain exposure records as follows:

- A current or former employee who is or may have been exposed to toxic substances or harmful physical agents.
- An employee who was assigned or transferred to work involving toxic substances or harmful physical agents.
- The legal representative of a deceased or legally incapacitated employee who was or may have been exposed to toxic substances or harmful physical agents.
- Designated employee representatives may access employee medical or exposure records and analyses created from those records only in very specific circumstances. Designated employee representatives include any individual or organization to whom an employee has given written authorization to exercise a right of access

TYPES OF EXPOSURES

- Metals and dusts, such as lead, cadmium, and silica.
- Biological agents, such as bacteria, viruses, and fungi.
- Physical stress, such as noise, heat, cold, vibration, repetitive motion, and ionizing and non-ionizing radiation.

DEFINITIONS

Access - The right and opportunity to examine and copy

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

Employee Exposure Record - May contain any of the following:

- Monitoring results of workplace air or measurements of toxic substances or harmful physical agents in the workplace, including personal, area, grab, wipe, or other forms of sampling results.
- Biological monitoring results, such as blood and urine test results.
- Safety data sheets (SDSs) containing information about a substance's hazards to human health.

Medical Records - Records that concern the health status of an employee, and are made or maintained by a physician, nurse, or other health care personnel, or technician.

Employee Medical Record:

- Medical and employment questionnaires or histories.
- Results of medical examinations and laboratory tests.
- Medical opinions, diagnoses, progress notes, and recommendations.
- Descriptions of treatments and prescriptions.
- Employee medical complaints.

EMPLOYER RESPONSIBILITIES

- Preserve and maintain accurate medical and exposure records for each employee.
- Inform workers of the existence, location, and availability of those medical and exposure records.
- Provide information regarding the standard to all employees and where records are available
- Provide records to employees or designated representatives in a reasonable time, place and manner.
- Inform employees of the provision of recordkeeping upon initial assignment and annually thereafter.
- Provide records to employees at no cost.
- Remove personal identifiers (name, address, social security number, payroll number, etc.) from records before access is granted.
- Maintain employee records for the duration of employment, plus 30 years
- Exemptions from keeping records:
 - Physical specimens, such as blood and urine samples
 - Records concerning health insurance claims if they are (1) maintained separately from your medical program and its records, and (2) not accessible by employee name or other personal identifier (e.g., social security number or home address).
 - Records created only for use in litigation that are privileged from discovery.
 - Records created as part of voluntary employee assistance programs, such as records for alcohol and drug abuse or personal counseling, if they are maintained separately from your medical program and its records.
 - Trade secret information involving manufacturing processes or a percentage of a chemical substance in a mixture, as long as you inform health professionals and employees and their designated representatives that you have deleted that information from medical and exposure records. If the exclusion of the trade secret information substantially impairs the evaluation of when and where the exposure occurred, however, you must provide alternative information to the employee consistent with the requirements of 29 CFR Part 1910.1020.
- If the company ceases to do business, then all records all records subject to this section shall be transferred to the successor employer. If there is no successor employer to receive and maintain the records, or intends to dispose of any records required to be preserved for at least thirty (30) years, the company shall notify affected current employees of their rights of access to records at least three (3) months prior to the cessation of the employer's business.

2.4 BEHAVIOR BASED SAFETY PROGRAM

The goal of the Penn Fencing Behavior Based Safety Program is to reinforce a strong commitment to safety by establishing an unbreakable Safety Culture. With participation from both management and employees, we feel the valued skills and experience from both sides can create a zero injury/illness rate. There are many factors that can contribute to an injury/incident such as faulty equipment, lack of training, pre-existing hazardous conditions, or unsafe behaviors. Implementing a Behavior Based Safety Program is just one way to prevent an accident. The Safety Coordinator will take responsibility for the implementation of the Behavior Based Safety Program; however other members of management and laborers will participate as observers.

PROGRAM ELEMENTS

- Conduct observations of employees working to note employee behaviors on the job
- Engage in conversation with employees
- Do not assign blame, criticize, or reprimand behaviors (the purpose is strictly to observe and note job tasks and actions to complete them)
- Coach by maintaining positive interaction with employees during the observation. This not only can be an opportunity to identify deficiencies, it can also be an opportunity to educate/recommend safer and more efficient ways to do the job by sharing your experiences
- Document observations to help measure the effectiveness of current programs and how to improve them
- All employees can be observed at any time and without notice

OBSERVATIONAL TRAINING

Training on the observation process will include the following:

- How to conduct the observation
- How to complete the observation form
- What the behaviors mean
- Feedback training
- Mentoring and coaching role play

OBSERVATION GUIDELINES

- Ask open ended questions; avoiding negative comments is critical. Start with positive remarks regarding safe behaviors to completing a job task(ie: ergonomic body position, use of PPE or tools)
- If unsafe behaviors are noted, ask why the employee chose to complete the task in that manner rather than reprimand them for violating policies
- Ask the employee for feedback about completing the job task (What improvements can be made? Were they trained to complete the task this way? Do other employees complete the task in the same manner?)
- Discuss possible repercussions of doing the task in unsafe manner(emphasize hazards presented by the action)

- Fill out observations (positive and negative) on the form. Accurately describe the job task, location, and tools and equipment available to complete the task.
- Follow-up - If you are made aware of a new hazard, DON'T IGNORE IT!
- Address how to correct the hazard with upper management
- Upon completion of an observation, the observer is expected to have a discussion with the observed to get feedback. The observer will:
 - Review the observation with observed employee
 - Start with a positive comments
 - Reinforce safe behaviors observed first
 - Describe and discuss unsafe behaviors observed
 - Solicit from observed employee explanation of his/her unsafe behavior with open-ended questions
 - Re-emphasize no consequence to observed employee.

OBSERVATION METRICS AND ACTION PLAN

Individual departments, as well as the company as a whole, will compare data from observation forms and perform a trend analysis. These results will be tracked by an acceptable method so that numerical and statistical comparisons can be made over time.

- Once data is collected from the observation forms, noted hazards are evaluated among upper management and the Safety Coordinator.
- Corrections are posted for employees to view
- Notations taken from observations regarding training are taken to determine the need for re-training and incorporating into new hire training.
- Engineering, Administrative, and Personal Protective Equipment controls are re-evaluated to determine the effectiveness of employee protection.
- Identified hazards abatement will be based on severity, low severity hazards must be abated within 30 days, high hazards must be abated immediately

Once trend analysis is complete, appropriate action plans must be developed to address unsafe behaviors. Action planning will include:

- Evaluate unsafe behaviors from trend analysis and prioritize
- Develop action plan for unsafe behaviors based on comments and feedback from data sheets
- Designate responsible parties and timeframes within the action plan
- Define who is responsible for action planning
- Ensure management support

Behavior Observation Form

Position Observed				Observer			
Date/Time:				Jobsite:			
	Safe	At Risk	Not Observed		Safe	At Risk	Not Observed
PPE				Body Positioning/Awareness			
Head				Head			
Eyes/Face				Eyes/Face			
Hearing				Hearing			
Hands				Hands			
Feet				Feet			
FR/High Visibility				FR/High Visibility			
Fall Protection				Fall Protection			
Respiratory				Respiratory			
				Awaked Positions			
Housekeeping				Tools/Equipment			
Slip/Trip/Fall				Proper Selection			
Clear Exit Routes				Proper Use			
Orderly Areas				In Good Condition			

Comments: _____

Stop Work Authority Initiated? Y / N **If Yes, Identify the reason:**

2.5 OSHA REPORTING & RECORDKEEPING

OSHA EMERGENCY REPORTING

All incidents must be reported to an appointed company official immediately.

Company Official: _____

Office: _____ Cell: _____

Depending on the nature and severity of the incident, the company official will ensure that the necessary actions are taken (outlined below).

Type of Incident	Reporting/Recordkeeping	Time Frame
<ul style="list-style-type: none"> • Fatality (On the job death) 	Report to OSHA @ 1-800-321-OSHA (6742)	Within 8 hours of the incident
<ul style="list-style-type: none"> • Work-related inpatient hospitalization • Amputations • Loss of an eye 	Report to OSHA @ 1-800-321-OSHA (6742)	Within 24 hours of the incident
<ul style="list-style-type: none"> • All incidents 	Conduct an accident investigation	Immediately
<ul style="list-style-type: none"> • OSHA-recordable injuries/illnesses (as outlined below) 	Complete OSHA 301 (or equivalent) Enter a log entry on OSHA Form 300.	Within 7 days of the injury or illness

OSHA RECORDKEEPING

OSHA recordkeeping is required for any employer with 11 or more employees at any time within the year. If an injury or accident should ever occur, it must be reported to the supervisor as soon as possible. An OSHA 300 log entry and summary report (OSHA 301 form or equivalent) must be maintained for every recordable injury and illness. The entry should be completed within 7 days after the injury or illness has occurred.

An OSHA recordable injury or illness is defined as an injury resulting in loss of consciousness, days away from work, days of restricted work, or medical treatment beyond first aid. First Aid includes:

- Tetanus shots
- Applying Band-aids or butterfly bandages
- Cleaning, flushing or soaking wounds
- Applying Ace bandages and wraps
- Taking non-prescription drugs at non-prescription strength (aspirin, Tylenol, etc.)
- Drilling fingernails/toenails
- Eye patches, eye flushing and foreign body removal from eye with Q-tips
- Finger guards
- Hot or cold packs
- Drinking fluids for heat stress
- Removing of a splinter (other than from the eye)

An annual summary of recordable injuries and illnesses (OSHA 300A) must be posted at a conspicuous location in the workplace from February 1 to April 30 and contain the following information: calendar year, company name, establishment name, establishment address, certifying signature of the highest ranking company official, title, and date. If no injury or illness occurred in the year, zeroes must be entered on the total line.

The OSHA logs should be evaluated by the employer to determine trends or patterns in injuries in order to appropriately address hazards and implement prevention strategies. OSHA recordkeeping forms must be maintained for a period of 5 years.

Note: The OSHA 300 and 301 logs must be kept confidential.

TAB 3:

PLANNING

3.1 JOB HAZARD ANALYSIS

Hazards analysis can get pretty sophisticated and go into much detail. Where the potential hazards are significant and the possibility for trouble is quite real, such detail may well be essential. However, for many processes and operations — both real and proposed — a solid look at the operation or plans by a variety of affected people may be sufficient. The easiest and possibly most effective method is using the step-by-step process of the Job Hazard Analysis (JHA), which is sometimes referred to as a Job Safety Analysis (JSA).

Job Hazard Analysis (JHA) is based on the following ideas:

- A specific job or work assignment can be separated into a series of relatively simple steps.
- Hazards associated with each step can be identified.
- Solutions can be developed to control each hazard.

Job Hazard Analysis is a relatively simple process that involves the following four basic steps:

- Select the job to be analyzed. In performing JHA, the term "job" is used to describe a single task or operation workers do as part of their occupation; it is a definite sequence of steps or separate activities that lead to the completion of a work goal.
- Separate the job into its basic steps.
- Identify the hazards associated with each step.
- Control each hazard.

Through this process, responsible officials can determine the safest, most efficient manner of performing a given job. JHA systematically carries out the basic strategy of accident prevention: The recognition, evaluation, and control of hazards.

Once a JHA has been developed, it is prepared in chart form, listing the basic job steps and the corresponding hazards and safe procedures for each step. A completed JHA chart can then be used as a training guide for employees; it provides a logical introduction to the work, its associated hazards, and the proper and safe procedures to be followed.

For experienced workers, a JHA chart is reviewed periodically to maintain safety-awareness on the job and to keep abreast of current safety procedures. Review is also useful for employees who have been assigned new or infrequent tasks.

Job Hazard Analysis Form

Job task: _____ **Date:** _____
Job location: _____ **Prepared by:** _____
Supervisor: _____ **Reviewed by:** _____
Required and/or recommended personal protective equipment: **Approved by:** _____

- Hard hat Safety Glasses Steel toed boots High-vis vest Fall arrest harness
 _____ _____ _____ _____ _____

Sequence of basic job steps <i>Beware of being too detailed. Record only the information needed to describe each job action. Rule of thumb, no more than 10 steps/tasks being evaluated.</i>	Potential accidents or hazards <i>Hazard Classification Categories: struck by/against; caught in/between; slip, trip, or fall; overexertion; ergonomic (awkward Postures, excessive Force, vibration, repetitive motion)</i>	Recommended safe job procedure <i>Hazard Control Categories: Engineer out (new way to do, change physical conditions or work procedures, adjust/modify/replace work station components/tools, decrease performance frequency); personal protective equipment (PPE); training; improve housekeeping</i>

Risk Analysis Form

Project #:	Client Name:	Project Location:
Date of Analysis:	Contractor:	Sub-Contractor:
Date of Work:	Project Name:	

HAZARD RISK RATING

What are the consequences of this hazard occurring? Consider what the most probable consequence is (below) with respect to this work	What is the likelihood (below) of the hazard consequence in Step 1 occurring?	1. Take Step 1 rating and select the correct column. 2. Take Step 2 rating and select the correct line. 3. Use the risk score where the two ratings cross on the matrix below. H = High, S = Serious, M = Medium, L = Low						
Extreme Multiple fatalities or permanent injuries Critical Single fatality or permanent injury Major Medical treatment or lost time injury Minor First aid treatment Insignificant Incident or near miss – no treatment	Almost Certain Is expected to occur in most circumstances Likely Will probably occur at least once Possible Event might occur at some time Unlikely/Rare Event not expected to occur or only in exceptional circumstances	Likelihood		Insignificant	Minor	Major	Critical	Extreme
			Almost Certain	M	S	H	H	H
			Likely	M	M	S	H	H
			Possible	L	M	M	S	S
		Unlikely/ Rare	L	L	M	M	S	

Process/Activity	Job/Task Hazard Sub Category	Hazardous Element (List the hazards relating to the work)	Hazard Risk Rating (prior to control)	Controls (List the controls to manage each of the hazards)	Hazard Risk Rating (After Controls)	Comments and/or Assigned to

3.2 PERMIT TO WORK

A permit to work program is a systematic program which specifies the foreseeable hazards and risk control measures related to specific activities that will be carried out in a workplace. These work activities are not permitted to commence before the necessary control measures, procedures, training and documents have been completed. Activities include new construction, general construction, maintenance, repairs, business operations and activities that pose a hazardous health, safety or environmental risk. An effective permit to work program ensures that all activities in the workplace are accounted for, effectively coordinated and safely managed.

Types of activities that may require a work permit include, but are not limited to:

- Confined space entry
- Hot work
- Working with a crane
- Working on energized systems
- Performing lockout/tagout
- Working near water with a drowning potential
- Working in an environment with the potential for H₂S exposure
- Working with explosives or radioactive material
- Any high hazard or high risk activity

Please refer to Penn Fencing's individual written safety & health programs for topic-specific permits (i.e. confined space, hot work, lockout/tagout). A general work permit is included on the following pages.

General Work Permit

Permit number _____

Work Request

Location of work _____

Contact name _____

Contact phone number _____

Summary of work to be done _____

Safety Procedures to be implemented prior to commencement of work.

1. The following processes are to be suspended during the course of the work

2. The following equipment is to be withdrawn from service during the course of the work

3. All users have been made aware of this suspension/withdrawal Yes No

4. Safety warning notices have been posted where required Yes No

5. The following steps have been taken to eliminate, control or contain hazards in the area

6. The following safety measures are recommended

Approval

I confirm that I have inspected the work area detailed above and declare that to the best of my knowledge and belief the work can be carried out safely and without serious risk of injury to health.

Signed _____ Date _____ Time _____

CONTROL OF RISKS ARISING FROM THE WORK

1. Isolation of services: (please tick as appropriate)

water power fuel lines compressed gases others (specify)

2. Are there safety implications resulting from the isolation? Yes No

3. Lock-off required? Yes No Location: _____

4. Safety signs posted? Yes No

5. Air monitoring required? Yes No

6. Are there hazards associated with the work? Yes No

If yes, what safety precautions are required to control the risks?

Declaration

I understand the precautions to be taken under this permit.

Name (print):	_____	Company/ Department	_____
Signed	_____	Date	_____
			Time _____

Permit validity period

From: Date: ___ / ___ / ___ Time: ___ : ___ **To:** Date ___ / ___ / ___ Time: ___ : ___

If the work is not completed within this timescale a new permit-to-work must be completed.

Completion Of Work

I confirm that the work has been completed in accordance with this permit. Services have been restored and the work area is ready for re-occupation.

Signed	_____	Date	_____	Time	_____
--------	-------	------	-------	------	-------

Reinstatement Of Work Area

I confirm that all equipment has been returned to service, safety signs have been removed and the users informed that work may resume in this area.

Signed	_____	Date	_____	Time	_____
--------	-------	------	-------	------	-------

3.3 FATIGUE MANAGEMENT

In order for employees not only to work safely but also efficiently, it is essential for employees to start their day with a good night's rest. A good night's rest is key to fueling the body to think clearly, improve moods and behaviors, improve quality of work, and most importantly work safely.

Studies have shown the correlation between fatigue and working hours. Excessively long working hours equates to less rest time between shifts which equates to increased absenteeism, reduced productivity, increased stress, and increased safety risks. Long working hours on the job and lack of rest breaks also play a role in injuries and illnesses. In 2002, the Bureau of Labor Statistics reported that half of lost time injuries occurred within the first 4 hours on the job. Another noticeable cluster of injuries (nearly 1/3) occur between the second half of the work shift. Nearly 40 percent of workers experience fatigue which not only creates personal health problems but becomes costly to employers by reduced productivity and increases injury rates. That is why it is important to recognize symptoms of fatigue and implement programs to reduce or eliminate the hazards associated with fatigue.

The main elements of the fatigue management plan are as follows:

- Initial and annual training will be provided on how to recognize fatigue, how to control fatigue through appropriate work and personal habits, and reporting of fatigue to supervision.
- Work hour limitations will be established and job rotation schedules will be controlled to control fatigue, allow for sufficient sleep, and increase mental fitness in an effort to control employee turnover and absenteeism.
- Ergonomic equipment will be used to improve workstation conditions such as anti-fatigue mats for standing, lift assist devices for repetitive lifting, proper lighting and control of temperature, and other ergonomic devices as deemed appropriate.
- Work tasks to control fatigue must be analyzed and evaluated periodically.
- Chairs will be provided for workers to sit periodically, and will provide periodic rest breaks for personnel
- Employees are responsible for reporting concerns for fatigue to shift supervisors to prevent injury or illness
- Shift Supervisors are responsible for enforcing the program and maintaining a balance between work and rest breaks to prevent fatigue, encourage safety, and prevent loss of productivity
- Employees must not chronically use over-the-counter or prescription drugs to increase mental alertness. Employees are discouraged from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.

TAB 4:

SAFETY & HEALTH PROCEDURES

4.1 HEAT ILLNESS

When the body is unable to cool itself by sweating, several heat-induced illnesses can occur, and can result in death. High temperature and humidity, direct sun or heat, limited air movement, physical exertion, poor physical condition, certain medications, inadequate tolerance for hot workplaces, and insufficient water intake can all lead to heat stress.

Heat stroke is the most serious heat related disorder and occurs when the body's temperature regulation fails and body temperature rises to critical levels. It is a medical emergency that may result in death. If a person shows signs of possible heat stroke, professional medical treatment should be obtained immediately.

The primary signs and symptoms of heat stroke are:

- Dry, hot skin with no sweating.
- Mental confusion or losing consciousness.
- Seizures or convulsions

Heat Exhaustion is a result of the combination of excessive heat and dehydration. Signs and symptoms of heat exhaustion include:

- Headaches, dizziness, lightheadedness or fainting.
- Weakness and moist skin.
- Mood changes such as irritability or confusion.
- Upset stomach or vomiting

Heat Cramps are usually caused by performing hard physical labor in a hot environment

- Thirst cannot be relied on as a guide for the need for water, drink water every 15-20 minutes
- Studies have shown that drinking carbohydrate-electrolyte replacement liquids is effective in recovery

Heat Rashes are the most common problem in hot environments where the skin is persistently wetted by un-evaporated sweat.

- Heat rash looks like a red cluster of bumps or small blisters.
- It is more likely to occur on the neck and upper chest, in the groin, under the breasts, and in elbow creases.
- The best treatment is to provide a cooler, less humid environment and keep the affected area dry.

PREVENTION

Water coolers are provided for drinking water only and shall be periodically cleaned and sanitized to eliminate any build-up, prevent growth of bacteria and keep the water safe to drink. Water coolers shall be periodically cleaned with a simple solution of soap and water. Use a sponge to wash it, getting into all of the crevices. After washing, rinse and dry the cooler.

Do not store sodas, drinking bottles, or anything else in the water cooler. Your hands carry germs and bacteria that will be transferred into the drinking water when retrieving bottles and cans from inside the water cooler.

Caution: Employees under doctor orders limiting their intake of fluids and employees on low-salt diets should consult with their doctor before drinking a sports beverage or taking salt tablets.

Tips for preventing heat illness include:

- Adjust work schedules to provide workers with a rest from the heat
- Postpone nonessential tasks
- Provide cool rest areas as well as shade and water for workers
- Wear proper protective clothing
- Ensure workers are drinking enough water to stay hydrated
- Allow workers time to acclimate to the hot environment
- Educate workers and supervisors to recognize heat illness and how to prevent it
- Know signs/symptoms of heat-related illnesses; monitor yourself and coworkers.
- Allow yourself to become acclimatized to hot weather
- Block out direct sun or other heat sources.
- Use cooling fans/air-conditioning and rest regularly
- Drink lots of water; $\frac{1}{2}$ your body weight in oz (i.e. – if you weigh 150 lbs, drink 75 oz of water.)
- Wear lightweight, light colored, loose-fitting clothes (do not remove your shirt).
- Avoid alcohol, caffeinated drinks, or heavy meals

FIRST AID FOR HEAT ILLNESS:

- Call 911 (or local emergency number) at once.
- While waiting for help to arrive:
 - Move the worker to a cool, shaded area.
 - Loosen or remove heavy clothing.
 - Provide cool drinking water.
 - Fan and mist the person with water.

4.2 DRIVING SAFETY

According to the Bureau of Labor Statistics' *National Census of Fatal Occupational Injuries in 2006*, more than 2,400 deaths a year result from occupational motor vehicle incidents. That number is more than 42 percent of the annual number of fatalities from occupational injuries. While fatal highway incidents remained the most frequent type of fatal work-related event, accounting for nearly one out of four fatal work injuries, the number of highway incidents fell 8 percent in 2006. The following Driving Safety rules and procedures have been established.

SAFETY RULES:

- Only authorized employees may drive a motor vehicle in the course and scope of work or operate a company-owned vehicle.
- Drivers must have a valid and current license to operate the vehicle.
- Operating a vehicle while under the influence of alcohol, illegal drugs, or certain medications that may impair driving skills is prohibited.
- Seatbelts must be worn by all vehicle occupants at all times whenever a vehicle is in motion.
- Authorized drivers must follow safe driving practices including, but not limited to:
 - Practice defensive driving techniques
 - Do not use any electronic equipment that may cause distraction
 - Obey all posted traffic and speed limit signs
 - Maintain a safe distance between vehicles at all times
 - Report all traffic violations and accidents to supervisors
- All collisions and traffic violations that have occurred while driving on company duties must be reported.
- All vehicles used for company business must be fit for purpose and maintained in a safe working order.
- Loads must be secure and shall not exceed the manufacturer's specifications and legal limits for the vehicle.

DEFENSIVE DRIVING TECHNIQUES

Following the rules of the road can help you concentrate on what you should be doing...driving. Stay out of the other vehicle's blind spot and avoid tailgating. Instead, keep a safe distance from other drivers by maintaining a safety cushion of driving space between your vehicle and those around you. As an extra precaution, know the condition of the weather and road and drive only as fast as those conditions allow.

Be cautious by staying alert and expecting the unexpected. Watch out for and anticipate other drivers, pedestrians or children on or near the road. Safe drivers scan constantly for hazards, predicting how they may be affected by a hazard and pre-determining how to avoid or reduce them.

The ever-changing variable of the road and other vehicles can make drivers instantly vulnerable to accidents. If drivers don't practice these safe practices on the road, they might personally discover why vehicle deaths and serious injuries now total more than all the wartime wounded and fatalities since 1776.

Be aware of the following items while driving:

- Know and observe all traffic rules and regulations
- Constantly be alert for the illegal acts and driving errors of other drivers. Make timely adjustments in your own driving so that these illegal acts and errors will not involve you in an accident.
- Know your vehicle and be aware of special hazards presented by abnormal, unusual, or changing conditions.
- Be aware of the rules of right-of-way, and be willing to yield to the right of way of the other driver, when necessary.

The following outlines general principles of defensive driving:

- **See the hazard**—when driving, think about what is going to happen or what might happen as far ahead of encountering a situation as possible. You should never assume everything will be "all right."
- **Understand the defense**—specific situations require specific ways of handling. Become familiar with the unusual conditions which you may face and learn them well so that you can apply them when the need arises.
- **Act in time**—once you've noted a hazard and understand the defense against it, act! Never take a "wait and see" attitude.

Taking these three steps and keeping good driving techniques in mind, you'll learn to "give in" a little; to tailor your driving behavior to the unexpected actions of other drivers and pedestrians; the unpredictable and ever changing factors of light, weather, road, and traffic conditions; and the mechanical condition of your vehicle.

4.3 ELECTRONIC DEVICE USE POLICY

It has become an increasing concern in the workplace to inform and educate employees on the dangers of distracted working and driving. All employees must review the company policies and safe work practices listed below and sign/date at the bottom. If employees have any questions or concerns regarding this policy they can contact their supervisor.

Deadly crashes resulting from distracted driving has become a growing danger on the roads. Numerous studies have demonstrated how the use of hand-held cell phones, music devices, tablets, etc. while driving, pose a significant safety risk to motorists, their passengers, and others on the road.

KEY ASPECTS OF THIS POLICY INCLUDE:

- Ban of answering or making phone calls, engaging in phone conversations, reading or responding to e-mails and text messages.
- All cell phones, music devices, tablets, radios, pagers, etc. are strictly prohibited from being used while operating a company vehicle.
- The use of a company-issued cell phone is also prohibited from being used while operating a company or personal vehicle.
- The use of any electronic device is prohibited while refueling vehicles and unloading/loading operations.
- Hands-free devices are not an alternative.

SAFE WORK PRACTICES TO FOLLOW:

- Before starting the vehicle, turn cell phones on vibrate, silent or off.
- Pull over to a safe place if a call must be made or received while on the road.
- Consider modifying the voicemail greeting to indicate that you are unavailable to answer calls or return text messages while driving.
- Inform clients, associates, and business partners of this policy as an explanation of why calls may not be returned immediately.

Violations of this policy will lead to disciplinary actions that could result in an employee being terminated.

Signature of Employee

Date

4.4 TOOLS AND EQUIPMENT

Hand and power tools are a common part of our everyday lives and are present in nearly every industry. These tools help us to easily perform tasks that otherwise would be difficult or impossible. However, these simple tools can be hazardous and have the potential for causing severe injuries when used or maintained improperly. Special attention toward hand and power tool safety is necessary in order to reduce or eliminate these hazards.

Hand and power tools are addressed in specific standards for the construction industry. General OSHA requirements state that all hand and power tools and similar equipment, whether furnished by the employer or the employee, be maintained in a safe condition. They establish standards for guarding, personal protective equipment, and switches. Specific standards apply to hand tools; power-operated hand tools; abrasive wheels and tools; woodworking tools; jacks; air receivers; and mechanical power-transmission apparatuses. The items below summarize safe practices for use of hand and power tools.

- Maintain all hand tools and equipment in a safe condition and check them regularly for defects. Identify broken or damaged tools and equipment by tagging or locking the controls until they can be repaired or disposed of.
- Follow the manufacturer's requirements for safe use of all tools.
- Use double insulated tools, or ensure that the tools are grounded.
- Equip all power saws (circular, skill, table, etc.) with blade guards.
- Make sure guards are in place before using power saws. Don't use power saws with the guard tied or wedged open.
- Turn off saws before leaving them unattended.
- Raise or lower tools by their handles, not by their cords.
- Don't use wrenches when the jaws are sprung to the point of slippage. Replace them.
- Don't use impact tools with mushroomed heads. Replace them.
- Keep wooden handles free of splinters or cracks and be sure the handles stay tight in the tool.
- Workers using powder-activated tools must receive proper training prior to using the tools.
- Always be sure that hose connections are secure when using pneumatic tools.
- Never leave cartridges for pneumatic or powder-actuated tools unattended. Keep equipment in a safe place, according to the manufacturer's instructions.
- Employees using hand and power tools and exposed to the hazard of falling, flying, abrasive, and splashing objects, or exposed to harmful dust, fumes, mists vapors, or gases will be provided with particular PPE necessary to protect them from the hazard.

HAND TOOLS

Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance.

Some examples of misused hand tools:

- Using a screwdriver as a chisel may cause the tip of the screwdriver to break and fly, hitting the user or other employees.
- If a wooden handle on a tool such as a hammer or an axe is loose, splintered, or cracked, the head of the tool may fly off and strike the user or another worker.
- A wrench must not be used if its jaws are sprung, because it might slip.
- Impact tools such as chisels, wedges, or drift pins are unsafe if they have mushroomed heads. The heads might shatter on impact, sending sharp fragments flying.

Saw blades, knives, or other tools are to be directed away from walkways, aisles, and other employees working in close proximity. Knives and scissors must be kept sharp to reduce the need to use excessive force and the potential for slippage.

Around flammable substances, sparks produced by iron and steel hand tools can be a dangerous ignition source. Where this hazard exists, spark-resistant tools made from brass, plastic, aluminum, or wood will be provided for safety.

PNEUMATIC POWER TOOLS

Pneumatic tools are powered by compressed air; they include chippers, drills, hammers, and sanders. There are several dangers encountered in the use of pneumatic tools. The main hazard is the danger of getting hit by one of the tool's attachments, or some kind of fastener the worker is using with the tool. Noise is another hazard associated with pneumatic tools. Refer to the Penn Fencing Hearing Conservation Program for more information regarding hearing protection.

Pneumatic tools that shoot nails, rivets, or staples, and operate at more than 100 pounds per square inch (psi), must be equipped with a special device to keep fasteners from being ejected unless the muzzle is pressed against the work surface. Eye protection is required and face protection is recommended for employees working with pneumatic tools. Noise is another hazard. Working with noisy tools such as jackhammers requires proper, effective use of ear protection.

When using pneumatic tools, employees must check to see that they are fastened securely to the hose by a positive means to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard.

Airless spray guns which atomize paints and fluids at high pressures (1,000 psi or more) must be equipped with automatic or visual manual safety devices which will prevent pulling the trigger until the safety device is manually released.

If an air hose is more than one-half inch in diameter, a safety excess flow valve must be installed at the source of the air supply to shut off the air automatically in case the hose breaks. In general, the same precautions should be taken with an air hose that are recommended for electric cords, since the hose is subject to the same kind of damage or accidental striking and presents tripping hazards. The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings shall not be exceeded. In addition, the use of hoses for hoisting or lowering is not permitted.

A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel. Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.

Compressed air guns should never be pointed toward anyone. The user should never "dead-end" it against him or herself or anyone else. Compressed air shall not be used to blow dirt, debris, or similar material off of your clothing, unless reduced to less than 30 psi. If using less than 30 psi for cleaning purposes, effective chip guarding and personal protective equipment meeting the requirements of 29 CFR 1926, Subpart E must be used.

Heavy jackhammers can cause fatigue and strains; heavy rubber grips reduce these effects by providing a secure handhold. Workers operating a jackhammer must wear safety glasses and safety shoes, which protect against injury if the hammer slips or falls. A face shield should also be used.

ELECTRIC TOOLS

Employees using electric tools must be aware of several dangers; the most serious is the possibility of electrocution. Among the chief hazards of electric-powered tools are burns and slight shocks which can lead to injuries or even heart failure. Under certain conditions, even a small amount of current can result in fibrillation of the heart and eventual death. A shock may cause the user to fall off a ladder or other elevated work surface.

To protect the user from shock, tools must either have a three-wire cord and be grounded, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool's metal housing. The other end is grounded through a prong on the plug. Anytime an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.

Double insulation is more convenient. The user and the tools are protected in two ways: by normal insulation on the wires inside, and by a housing that cannot conduct electricity to the operator in the event of a malfunction.

The following general practices should be followed when using electric tools:

- Electric tools should be operated within their design limitations.
- Gloves and safety footwear are recommended during use of electric tools.
- When not in use tools should be stored in a dry place.

- Electric tools should not be used in damp or wet locations.
- Work areas should have adequate lighting.

POWDER-ACTUATED TOOLS

Powder-actuated tools used for fastening operate and can injure and kill much like a loaded gun and should be treated with the same respect and precautions. In fact, they are so dangerous, that they must be operated only by specially trained employees. For these reasons, OSHA regulates powder-actuated tools under 29 CFR 1926.302(e).

The following requirements are to be followed when using powder-actuated tools:

- The tool must be tested each day before loading according to the manufacturer's recommended procedure.
- If a defect develops during use, the tool must be removed from service until properly repaired.
- Employees using powder-actuated tools must wear proper personal protective equipment.
- Tools must not be loaded until just prior to the intended firing time. People and hands must be kept clear of the open barrel end.
- Loaded tools must not be left unattended.
- Fasteners must not be driven into very hard or brittle materials.
- Driving into easily penetrable materials must be avoided unless these materials are backed by an impenetrable substance.
- No fastener shall be driven into a spalled area caused by an unsatisfactory fastening.
- Powder-actuated tools shall not be used in an explosive or flammable atmosphere.
- Powder-actuated tools must be used with correct shield, guard, or attachment recommended by the manufacturer.
- Powder-actuated tools must meet ANSI A10.3-1970, Safety Requirements for Explosive-Actuated Fastening Tools.

TRAINING

- Only employees who have been trained in the operation of a particular tool in use may be allowed to operate a powder-actuated tool.
- Employees must be trained to recognize and avoid unsafe conditions and the regulations applicable to their work environment to control or eliminate the hazards.
- Protection limitations and precautions must be provided to users of eye protection equipment necessary for powder-actuated tool use.

GUARDING

Hazardous moving parts of a power tool need to be safeguarded. For example, belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating, or moving parts of equipment must be guarded if such parts are exposed to contact by employees.

Guards, as necessary, should be provided to protect the operator and others from the following:

- Point of operation
- In-running nip points
- Rotating parts, and
- Flying chips and sparks.

Safety guards must never be removed when a tool is being used. For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it makes contact with the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

When power tools are designed to accommodate guards, they will be equipped with such guards at all times when in use. All power saws (circular, skill, table, etc.) will be equipped with blade guards. Ensure that guards are in place before using a piece of equipment that is equipped with guards. Do not use power saws with the guard tied or wedged open.

Portable grinding tools need to be equipped with safety guards to protect workers, not only from the moving wheel surface, but also from flying fragments in case of breakage.

Guarding shall meet the requirements set forth in ANSI B15.1. Guards may not be manipulated in such a way that will compromise its integrity or the protection intended.

4.5 GOOD HOUSEKEEPING POLICY

There are good safety reasons for OSHA's concern about housekeeping. A messy workplace is not only annoying and inefficient; it creates a number of potential safety hazards:

- Tripping and falling over equipment that doesn't belong on the floor, such as machines, tools, cords, hoses, scrap, and boxes.
- Getting hit by or bumping into objects: For instance, tools left perched on the edge of a roof, shelf or table, or a drawer that's left open.
- Punctures and splinters from sharp tools left lying around, or from rough pieces of wood or other sharp objects.
- Serious electrical hazards such as cords left near heat or water.
- Fire hazards, including flammable liquids or scrap left near ignition sources; dust or lint on machinery; or materials blocking fire exits or equipment.
- Chemical exposure or spills when chemical containers are left open.
- Chemical reactions from open chemical container contents exposed to other chemicals, water, or air.
- Potential fatalities if obstacles inhibit an emergency evacuation
- Potential injuries from falling objects.

The best way to prevent these dangers is to follow this simple and old-fashioned rule: Assign a specific storage place for each item, and then insist that every item be kept in its assigned place whenever it is not in use.

Yes, that's easier said than done. But the first step is to say it—repeatedly—and then insist that it be done right then and there. If necessary, take the time to reorganize or rearrange the work area to provide an assigned place for all items. You may also want to obtain extra boxes, bins, etc., for storage.

Be sure workers understand that the maintenance department or cleaning staff can't be expected to handle internal housekeeping. Workers don't know where tools and supplies are supposed to be kept and, in many cases, are prohibited from handling various tools, machines, or chemical containers. In addition, the maintenance personnel are not standing around waiting to clean up a spill or throw away trash. It only takes a second to put, or throw, things away—NOW.

Remember that a neat workplace is more than "nice to have." With persistence, neatness will eventually become a habit. People are even likely to discover that they can do their jobs a lot faster and easier in a neat work area.

Good housekeeping in the workplace is more than an attempt to keep things looking presentable. It's also an important safety issue. OSHA requires general housekeeping for all jobsites during the course of construction, alteration, or repairs. Refer to 29 CFR 1926.25 of the OSHA standards for specific language and details.

4.6 VEHICLES AND MOBILE EQUIPMENT

If vehicle safety practices are not observed, employees risk being pinned between vehicles and walls, struck by swinging backhoes, crushed beneath overturned vehicles, or other similar accidents. In addition, work near public roadways present the risk of being struck by trucks or cars.

Provided below are suggested practices for operations involving vehicles and mobile equipment. For further details, refer to the OSHA standards covering motor vehicles and mechanized equipment.

- Only authorized employees are allowed to operate mobile equipment.
- Employees must be instructed to stay clear of backing and turning vehicles and equipment with rotating cabs.
- All off-road equipment used on site must be equipped with rollover protection (ROPS).
- Back-up alarms for equipment with limited rear view must be maintained, or use someone to help guide them back.
- Conduct pre-shift inspections on the assigned equipment to verify that the equipment is in working order.
- Be sure that all vehicles have fully operational braking systems, brake lights, and a working backup alarm.
- Use seat belts when transporting workers in motor and construction vehicles.
- Maintain at least a 10-foot clearance from overhead power lines when operating equipment.
- Block up the raised bed when inspecting or repairing dump trucks.
- Know the rated capacity of the crane and use accordingly.
- Ensure the stability of the crane.
- Use a tag line to control materials moved by a crane.
- Verify experience or provide training to crane and heavy equipment operators.
- Passengers are not permitted to ride on equipment unless it is equipped to accommodate passengers.
- The equipment operator shall use access provided to get on and off equipment.
- If the mobile equipment does not have an enclosed cab, eye protection must be used when in operation.
- Vehicles and mobile equipment must only be used in the manner in which it was designed and intended for.
- Before fueling, the operator of a gasoline or diesel vehicle must shut off the engine and shall see that the nozzle of the filling hose makes contact with the filling neck of the tank. No one shall be on the vehicle during fueling operations, except as specifically required by design. There shall be no smoking or open flames in the immediate area during fueling operation.

TAB 5:

TRAINING & EDUCATION

5.1 SAFETY MEETINGS

Safety meetings are an important part of jobsite safety. They are an opportunity for employees and their supervisor to discuss specific hazards encountered at the jobsite and how best to address them.

Meetings will focus on situations faced by the workers in the current work environment. Prior to each shift, supervisors should address the hazards that will face the workers on the particular jobsite. Individual workers should be encouraged to provide input on their observations of hazards that exist or will be encountered during the shift that is about to begin.

Effective safety meetings should incorporate the following:

- Discuss safety policies and procedures with management and make recommendations for improvements.
- Review accident investigation reports on all accidents and “near-misses”.
- Identify unsafe conditions and work practices and make recommendations for corrections.
- Discuss problems that have arisen or that are anticipated along with any other safety and health topics.

The meeting should be a valuable educational experience by:

- Keep the discussion flowing and on-topic
- Start and stop the meetings on time
- Use illustrated material and demonstrations to make the point
- Discuss each topic thoroughly
- Review accidents, injuries, property losses, and near misses
- Evaluate accidents, injuries, property losses, and near misses for trends and similar causes to initiate corrective actions.

Safety meetings may also incorporate various training topics in the form of toolbox talks which are brief discussions regarding areas of safety applicable to a particular task or jobsite. Tool box talks that include subject matter applicable to construction are included in the training section of this document.

Each safety meeting will be documented on the form on the following page.

SAFETY MEETING MINUTES

Jobsite: _____ Date: _____

Supervisor: _____

Topics Discussed:

Action Items:

Meeting Attended by (print name):

Signature:

5.2 TRAINING & EDUCATION

Training is an essential component of an effective safety and health program addressing the responsibilities of both management and employees at the site. Training is most effective when incorporated into other education on performance requirements and job practices.

Training programs should be provided as follows:

- Initially when the safety and health plan is developed
- For all new employees before beginning work
- When new equipment, materials, or processes are introduced
- When procedures have been updated or revised
- When experiences/operations show that employee performance must be improved
- At least annually

Besides the standard training, employees should also be trained in the recognition of hazards – be able to look at an operation and identify unsafe acts and conditions. A list of typical hazards employees should be able to recognize may include:

- **Fall Hazards** - Falls from- Floors, Roofs and roof openings, Ladders (Straight and Step), Scaffolds, Wall openings, Tripping, Trenches, Steel Erection, Stairs, Chairs
- **Electrical Hazards** - Appliances, Damaged cords, Outlets, Overloads, Overhead High Voltage, Extension cords, Portable Tools (broken casing or damaged wiring), Grounding, Metal Boxes, Switches, Ground fault circuit interrupters(GFCI)
- **Caught Between** – Cave-Ins, Unguarded Machinery, Equipment, Confined Spaces
- **Struck By** – Vehicles, Machinery, Flying/Falling Objects, Concrete/Masonry Walls
- **Housekeeping Issues** - Exits, Walkways, Floors, Trash, Storage of Materials (Hazardous and Non-Hazardous), Protruding Nails, Exits (blocked), Trips/Slips, Stairs, Un-even flooring, Electrical cords, icy walkways, etc.
- **Fire Hazards** - Oily-Dirty Rags, Combustibles, Fuel Gas Cylinders, Exits (blocked)
- **Health Hazards** - Silicosis, Asbestos, Loss of hearing, Eye injury due to flying objects, Chemical exposures, Poison Ivy, Stagnant water

Employees trained in the recognition and reporting of hazards and supervisors trained in the correction of hazards will substantially reduce the likelihood of a serious injury.

Annual safety training is conducted by Lancaster Safety Consulting, Inc. The annual training session lasts approximately four hours. Additional training may be conducted throughout the year by authorized in-house trainers. Training topics for all employees include, but are not limited to:

- Hazard communication & labeling
- Personal Protective Equipment & Hazard assessment review
- Respiratory & Dust Mask Safety
- Fire, flammables & fire extinguishers

- Bloodborne Pathogens
- Fall Protection: slips/trips/falls, fall arrest training, & walkways/stairs

Training methods and media may include, but not be limited to PowerPoint based training, videos, quizzes, scenarios, and group discussions. Alternative training methods are not utilized at this time.

Penn Fencing measures training comprehension based on verbal discussions, group activities, or quizzes administered throughout the training class and through on the job monitoring. Training documentation and training programs are maintained at the main office and are available for review, upon request. Training records are kept in accordance with established procedures and are maintained for a minimum of five years.

Penn Fencing conducts audits of the safety program on an annual basis, at minimum. Factors addressed in the annual audit include, but are not limited to the following.

- Hazard Assessment review
- Personal Protective Equipment analysis
- Written safety program review
- The need for medical clearances or evaluations
- Renewal of training and professional certifications, if applicable

5.3 NEW HIRE ORIENTATION

Whenever a new employee comes on board, there is a period of training and learning in which the new employee learns about the company's safety and health programs, emergency action plans, fire protection policy, and any other safety-related issues that the employee must know.

This is also an opportunity to influence the new employee on the safety culture of the company, and positively influence that employee to keep safety always in mind.

The employee orientation will be started during the employee's first day on his or her new job. A qualified company representative will conduct the new hire orientation. The entire orientation program may be broken up over a period of a few days, but when it is complete, employees should know the following safety information:

- The organization's safety objectives and goals.
- The function of the corporate safety committee.
- What employees should do if they are injured on the job.
- The procedures for reporting accidents, near-miss incidents, hazards, injuries, and illness.
- What to do in case of an emergency.
- The facility's use of warning signs and tags.
- OSHA's recordkeeping requirements and employee access to exposure and medical records.
- The safety rules and safe procedures that apply to their jobs (especially for tasks with OSHA-required training).

As part of the new hire orientation process, the following topics, at minimum, will be covered:

- Personal Protective Equipment
- Hazard Communication
- Emergency Evacuation & Fire Safety
- Bloodborne Pathogens

Depending on the job classification, the following training may also be provided at the company's discretion:

- OSHA 10 Hour training
- OSHA 30 Hour training
- First Aid, CPR, and AED training

5.4 MISCELLANEOUS TRAINING LOGS

OSHA'S EMPLOYEE RESPONSIBILITIES

- Read the OSHA Poster at the jobsite.
 - Comply with all applicable OSHA standards.
 - Follow all lawful employer safety and health rules and regulations
 - Wear or use prescribed protective equipment while working.
 - Report hazardous conditions to the supervisor.
 - Report any job-related injury or illness to the employer and seek treatment promptly.
 - Exercise rights under the OSH Act in a responsible manner.
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TAB 6: FORMS DIRECTORY

Lockout/Tagout Forms			
Name	Location	Responsibility	Occurrence
Outside Personnel/Contractor Certification	Control of Hazardous Energy (Lockout/Tagout)	Management and Outside Personnel	As needed
New Equipment	Control of Hazardous Energy (Lockout/Tagout)	Management or Authorized Personnel	When new equipment is purchased
Periodic Inspection form	Control of Hazardous Energy (Lockout/Tagout)	Management or Authorized Personnel	Annually
Periodic Inspection Corrective Action Form	Control of Hazardous Energy (Lockout/Tagout)	Management or Authorized Personnel	When authorized personnel are observed incorrectly performing LOTO

Personal Protective Equipment Forms			
Name	Location	Responsibility	Occurrence
Personal Protective Equipment Checklist	Personal Protective Equipment	Affected Employee	Initial Assignment

Respiratory Protection Forms			
Name	Location	Responsibility	Occurrence
Personnel in Respiratory Program	Respiratory Protection Program	Employer/Employee	Initial assignment
Medical Release Form	Respiratory Protection Program	Employees required to wear a respirator	Before an employee can wear a respirator
Voluntary Dust Mask Use Acknowledgement	Respiratory Protection Program	Employees who voluntarily wear a respirator	When an employee decides to voluntarily wear a dust mask
Respirator Fit Test Log	Respiratory Protection Program	Employees who wear respirators	When an employee is fit tested for a respirator
Respirator Fit Test Form	Respiratory Protection Program	Employees who wear respirators	Before an employee can be fit tested
Respirator Inspection Checklist	Respiratory Protection Program	Employees who wear respirators	Pre use of the respirator

Forklift Forms			
Name	Location	Responsibility	Occurrence
Forklift Inspection Checklist	Safety Program for Forklifts & Other Industrial Trucks	Forklift Operator	Daily/Before use

Emergency Action and Fire Safety Forms

Name	Location	Responsibility	Occurrence
Emergency Evacuation Drill Attendance Log & Completion Form	Emergency Action and Fire Safety	Personnel in charge of head count	Annually
General Fire Prevention Checklist	Emergency Action Plan & Fire Safety Program	Management or designated employee	Monthly
Exit Checklist	Emergency Action Plan & Fire Safety Program	Management or designated employee	Monthly
Flammable & Combustible Materials Checklist	Emergency Action Plan & Fire Safety Program	Management or designated employee	Monthly
Fire Extinguisher Inspection Checklist	Emergency Action Plan & Fire Safety Program	Management or designated employee	Monthly
Hot Work Permit	Emergency Action Plan & Fire Safety Program	Supervisor	Before completing hot work; Only valid for 24 hours

Bloodborne Pathogens Forms			
Name	Location	Responsibility	Occurrence
Hepatitis B Vaccine Declination Form	Bloodborne Pathogens Exposure Control Plan	Management/Employee	Once employees are exposed to bloodborne pathogens, they must be offered the Hep. B Vaccination. If they decline, a declination form will need to be reviewed & signed.
Sharps Injury Form	Bloodborne Pathogens Exposure Control Plan	Management and affected employee	Following exposure to bloodborne pathogens
Bloodborne Pathogens Exposure Report Form	Bloodborne Pathogens Exposure Control Plan	Management and affected employee	Following exposure to bloodborne pathogens

Fall Forms			
Name	Form	Form	Form
Walking-Working Surfaces Inspection Checklist	Fall Protection Program	Supervisor	As needed (weekly, monthly, quarterly, etc.)
Fall Arrest Harness Inspection Report	Fall Protection Program	Employee wearing the PPE	Pre/post use
Fall Protection Safety Inspection Report	Fall Protection Program (1926 only)	Supervisor	Before use
Fall Protection Safety Audit Checklist	Fall Protection Program	Supervisor	As needed
Fall Protection Accident Investigation Report	Fall Protection Program	Management and affected employee	Following an accident involving fall protection
Fall Protection Safety Meeting Report	Fall Protection Program	Supervisor with employees	To be completed during/following any safety meetings regarding fall protection
Site Specific Fall Protection Plan	Fall Protection Program (1926 only)	Jobsite supervisor	Before starting work on a new jobsite

Injury Illness Prevention Program Forms

Name	Location	Responsibility	Occurrence
Stop Work Report	Injury Illness Prevention Program	Any employee	When necessary
Disciplinary Action Form	Injury Illness Prevention Program	Management with employee(s) involved	Following any violations
Subcontractor Prequal Form	Injury Illness Prevention Program	Subcontractors	Before working with subcontractors
Accident Investigation Report	Injury Illness Prevention Program	Management with employee(s) involved	Following any accident. Complete right away.
Near Miss Reporting	Injury Illness Prevention Program	Management with employee(s) involved	Following any near misses
Job Hazard Analysis Form	Injury Illness Prevention Program	Management or designated employee	Encouraged to be completed for all job tasks
Risk Analysis Form	Injury Illness Prevention Program	Management or designated employee	Encouraged to be completed for all job tasks
General Work Permit	Injury Illness Prevention Program	Management or designated employee	Refer to Section 3.2 for a list of tasks that require a work permit
Safety Meeting Minutes	Injury Illness Prevention Program	Management or designated employee	Following safety committee meetings, if applicable.

Jobsite Safety Manual Forms

Name	Location	Responsibility	Occurrence
Emergency Information	Jobsite Safety and Health Manual	Management or designated employee	Prior to the start of each job
Stop Work Report	Jobsite Safety and Health Manual	Supervisor	Any time a person in the work area is at risk of injury
Jobsite Inspection Checklist	Jobsite Safety and Health Manual	Safety Coordinator	Prior to the start of each job

TAB 7:

TAB 8:
