

ANNEX 4

MANUAL FOR OCCUPATIONAL
HEALTH AND SAFETY

Union Temporal – IJP

Manual For Occupational Health and Safety

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Safety and Health Program Manual Review & Updates

DATE:

DESCRIPTION: Manual review

SIGNATURE:

DATE:

DESCRIPTION:

UT/IJP Safety and Health Policy Statement

We are dedicated to providing a safe and healthful environment for employees and customers, protecting the public and preserving UT/IJP's assets and property.

At UT/IJP our most valuable resources are the people who work for us. Injuries can be prevented. To achieve this objective, UT/IJP will make all reasonable efforts to comply with all government regulations pertaining to safety and health issues. An effective Safety and Health Program will be carried out throughout our organization.

The Safety and Health Program will assist management and non-supervisory employees in controlling hazards and risks which will minimize employee and customer injuries, damage to customer's property and damage or destruction of UT/IJP property.

All employees will follow this program. This program is designed to encourage all employees to promote the safety of their fellow employees and customers. To accomplish our safety and health goals, all members of management are responsible and accountable for implementing this policy, and to insure it is followed.

UT/IJP is sincerely interested in the employee's safety. The policy of UT/IJP is to provide safe equipment, adequate tools and training, and the necessary protective equipment. It is the employee's responsibility to follow the rules of safety as established for their protection and the protection of others, and to use the protective devices, which UT/IJP provides.

Safety Education and Training Program

UT/IJP is committed to instructing all employees in safe and healthy work practices. UT/IJP will provide training to each employee with regard to general, acceptable, safety procedures and to any hazards or safety procedures that are specific to that employee's work situation.

Purpose of a Hazard Communication Program:

To provide employees with the knowledge and training necessary to understand and protect themselves and others from the chemicals they use. Also, to comply with the OSHA Hazard Communication Standard (1910.1200).

Training Will Occur When:

- Upon Hiring
- UT/IJP believes additional training is warranted
- An employee is given a new job assignment
- New substances, equipment, or new procedures are introduced which represent a new hazard
- UT/IJP is made aware of a new hazard

Training Areas:

Employee training will consist of new employee orientation, periodic group meetings, and one-on-one training. The Safety and Health training provided to employees will include:

- Employee Safety Handbook
- First Aid
- UT/IJP Safety and Health Policy
- UT/IJP Safety and Health Program
- Incident Reporting
- Hazard Communication
- Hazardous Material Spill Response
- Personal Protective Equipment requirements
- Emergency Procedures
- Housekeeping
- Job Specific Hazards

Training Documentation:

Employee Training will be documented using the forms on the next two pages.

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Employee Safety Training Checklist

Employee Name: _____ Hire Date: _____

Position: _____ Trainer: _____

I acknowledge that I have been trained in the SAFETY AND HEALTH areas checked below, and agree to follow all UT/IJP Safety and Health Rules, Policies and Procedures.

_____ Safety and Health Program

- My right to ask questions, or report any safety hazards, either directly or anonymously without any fear of reprisal.
- The location of UT/IJP safety bulletins and required safety postings (i.e., summary of occupational injuries and illnesses, and Safety and Health Protection Poster).
- Disciplinary procedures that may be used to ensure compliance with safe work practices.
- Reporting safety concerns.
- Accessing the department safety committee.

_____ Incident Reporting and Reporting Occupational Injuries and Illnesses.

_____ Hazard Communication

- The potential occupational hazards in the work area associated with my job assignment.
- The safe work practices and personal protective equipment required for my job title.
- The location and availability of MSDS's.
- The hazards of any chemicals to which I may be exposed, and my right to the information contained on Material Safety Data Sheets (MSDS's) for those Chemicals.

_____ Hazardous Material Spill Response

_____ Bloodborne Pathogen Response

_____ Personal Protective Equipment

_____ Employee Safety Manual

_____ Machinery Tag Out Program

_____ Emergency Procedures

I understand the above items and agree to comply with safe work practices in my work area.

Employee Signature

Date

I have trained the above employee in the categories indicated on this form.

Trainer's Signature

Date

Safety Meeting Record

Job: _____

Department or Crew: _____

Date: _____

OUTLINE

Safety Title: _____

Key Points:

Applications to Project:

Safety Reminders:

Employee Safety Recommendations:

Meeting Attended By:

Safety and Health Communication

Communicating With Employees on Safety and Health Issues

Communicating with employees regarding health and safety issues must be a two way street. It must consist of both employer-to-employee **and** employee-to-employer communications. Employees will be trained through the formal Safety and Health Program, new employee orientation, and training specific to new or current job assignments and/or hazards.

Reporting of Safety and Health Hazards:

UT/IJP has a system for the employee to report a hazard or unsafe condition. The form on the next page will be used for reporting and documenting such hazards. The employee should also notify his/her immediate supervisor verbally of such hazard or condition. The "Safety Suggestion Form" will be sent to the employee's supervisor or designated Safety Manager. A prompt and thorough investigation will be conducted of the situation.

Postings:

As a routine part of the Safety and Health Program, postings required by state and federal law (for example, Safety and Health protection on the Job, state OSHA citations and responses, etc.) will be prominently displayed in employee areas.

Training:

UT/IJP has training requirements designed to instruct each employee on general safety procedures as well as safety procedures specific to the employee's job. These training requirements are described in greater detail in the chapter entitled SAFETY AND HEALTH TRAINING.

Employee Safety Handbook:

All employees will be provided with an Employee Safety Handbook before they are to begin work and at the time of orientation. (Management will photocopy pages 17 through 28 of this manual, staple the pages together, and give it to the every new hire). They are to read the handbook and acknowledge its receipt by filling out the second page of the handbook. This page will be removed from the handbook and placed in their personnel record.

Safety Committee

The Safety Committee will be composed of rank and file employees. The President will appoint the Safety Committee Chairperson. The Safety Committee will function as an advisory body to develop and recommend to UT/IJP Management matters of policy and procedure affecting administration of UT/IJP Safety and Health Program.

The Committee will meet at a mutually convenient time, at the request of a member of the Committee, but not less than once every two months. The Committee is responsible for:

- Reviewing statistical data, records, and reports of safety matters to determine the effectiveness of overall accident and loss prevention efforts and to develop recommendations for improvement.
- Reviewing and analyzing accident and property loss investigation reports for:
 - Accuracy and completeness (recommending follow-up investigation if necessary).
 - Provide recommendations for corrective action and provide consistency throughout UT/IJP operations.
 - Identification of accident problem or trend and determination of what order they should be given attention.
- Reviewing safety and property inspection reports, job safety analyses, supervisor's safety observation reports, and employees' suggestions for:
 - Possible changes in work practices or procedures.
 - Need for safety procedures.
 - Need for protective device or equipment.
 - Need for training.
- Developing practical safety and property inspection procedures, and assisting in making inspections when requested by the Safety and Health Manager.
- Keeping Managers informed of the progress of the Safety Program and informed as to the safety records of employees or other segments of UT/IJP.
- Assisting in developing the records and statistical data necessary to provide an accurate picture of UT/IJP safety problems.
- Identify unsafe work practices and conditions and suggest appropriate remedies. Ensure that employees and others (visitors, contractors, etc.) are informed about safety policies, training programs, injury risks and causation, and other health and safety-related matters.

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- Maintain an open channel of communication between employees and management concerning occupational and environmental health and safety matters.
- Provide a means by which employees can utilize their knowledge of workplace operations to advise management in the improvement of policies, condition, and practices.

SAFETY SUGGESTION FORM

NAME: _____ DATE: _____
(OPTIONAL)

DESCRIPTION OF UNSAFE CONDITION OR PRACTICE:

CAUSE OR CONTRIBUTING FACTORS:

SUGGESTION FOR IMPROVING SAFETY:

Draw a picture to describe situation:

Hazard Identification and Communication

The purpose of this notice is to inform you that UT/IJP is complying with the OSHA HAZARD COMMUNICATION STANDARD, TITLE 29 CODE OF FEDERAL REGULATIONS 1910.1200, by using MSDS's, by compiling a Hazards Chemicals List, by insuring that containers are labeled, and by providing each employee with training.

This program applies to all work operations in UT/IJP where the employee may be exposed to hazardous substances under normal working conditions or during emergency situations.

The Safety and Health Manager is the program coordinator, acting as the representative of UT/IJP, who has overall responsibility for the program. The Safety and Health Manager will review and update the program as necessary. Copies of the written program may be obtained from the Safety and Health Manager.

Under this program, each employee will be informed of the contents of the Hazard Communication Standard, the hazardous properties of chemicals which they will use, safe handling procedures, and measures to be taken to protect themselves from these chemicals. Employees will also be informed of the hazards associated with chemicals in unlabeled pipes.

List of Hazardous Chemicals

The Safety and Health Manager will make a list of all hazardous chemicals and related work practices used in UT/IJP and will update the list as necessary. This list of chemicals will be found at all locations UT/IJP conducts business. This list also identifies the corresponding Material Safety Data Sheet (MSDS) for each chemical. Any new hazardous chemicals received by UT/IJP will have an MSDS document available for inspection before any employee uses the chemical. A master list of these chemicals will be maintained by, and is available from the Safety and Health Manager. The **MSDS Master List** form on page 15 will be used.

Material Safety Data Sheets (MSDS's)

MSDS's provide each employee with specific information on the chemicals used. The Safety and Health Manager will maintain a binder with an MSDS on every substance on the list of hazardous chemicals. The MSDS will be a fully completed OSHA Form 174 or equivalent (Page 13 and 14). UT/IJP representative, the Safety and Health Manager, will insure that each site maintains an MSDS for hazardous materials in that area and will be made readily available to any employee at every work site.

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Unusual	Fire	Fighting Procedures

Section V - Reactivity Data

Stability	Unstable		Conditions to Avoid
	Stable		
Incompatibility (<i>Materials to Avoid</i>)			
Hazardous Decomposition or Byproducts			
Hazardous Polymerization	May Occur		Conditions to Avoid
	Will not Occur		

Section VI – Health Hazard Data

Route(s) of Entry: Ingestion?	Inhalation?	Skin?
Health Hazards (Acute and Chronic)		
Carcinogenicity: OSHA Regulated?	NTP?	IARC Monographs?
Signs and Symptoms of Exposure		
Medical Conditions- Generally Aggravated by Exposure		
Emergency and First Aid Procedures		

Section VII - Precautions for Safe Handling and Use

MSDS Responsibility

The Safety and Health Manager is responsible for acquiring and updating MSDS's. The Safety and Health Manager will contact the chemical manufacturer or vendor if additional research is necessary or if an MSDS has not been supplied with an initial shipment. The form on page 13 will be used to request hazardous information.

Labels and Other Forms of Warning

The Safety and Health Manager will insure that all hazardous chemicals in the work place are properly labeled and updated as necessary. Labels should list at least the chemical's identity, appropriate hazard warnings, and the name, and address of the manufacturer, importer, or other responsible party. The Safety and Health Manager will refer to the corresponding MSDS to assist each employee in verifying label information. Labels are required on portable containers.

Non-Routine Tasks

When employees are required to perform hazardous, non-routine tasks (e.g., cleaning tanks, entering confined spaces, etc.), a special training session will be conducted to inform them of any hazards they may encounter, and the precautions to take to reduce and avoid exposure or danger.

Training

Everyone who works with or is potentially exposed to hazardous chemicals will receive initial training on the Hazardous Communication Standard and the safe use of those hazardous chemicals by the Safety and Health Manager. Whenever a new chemical or hazard is introduced, additional training will be conducted to address the new hazard and protective measures to be taken.

The training plan will emphasize these components:

- Summary of the standard and this written program.
- Chemical and physical properties of hazardous materials (e.g., flash point, reactivity, etc.) and methods that can be used to detect the presence or release of chemicals (including chemicals in unlabeled pipes).
- Physical hazards of chemicals (e.g., potential for fire, explosion, etc.), health hazards, including signs and symptoms of exposure, associated with exposure to chemicals and any medical condition known to be aggravated by exposure to the chemical.

The training plan will emphasize these components (continued):

- Procedures to protect against hazards (e.g. personal protective equipment required, proper use and maintenance, work practices, methods to assure the

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proper use and handling techniques, and procedures for emergency response).

- Work procedures to follow to assure protection when cleaning hazardous chemical spills and leaks.
- Where MSDS's are located, how to read and interpret information on both labels and MSDS's and how employees may obtain additional hazard information.

Contractor Employees

The Safety and Health Manager will advise outside contractors in person of any chemical hazards that may be encountered in the normal course of their work on UT/IJP premises, the labeling system in use, the protective measures to be taken, and the safe handling procedures to be used. In addition, these individuals will be notified of the location of all MSDS's. Each contractor that brings chemicals onto UT/IJP premises must provide UT/IJP with the appropriate hazard information on these substances, including the labels used and the precautionary measures to be taken in working with these chemicals.

Identification of Workplace Hazards:

Periodic, scheduled inspections will occur as a routine part of UT/IJP business. The Safety and Health Manager will insure these inspections occur. The Safety Inspection Checklist (a copy of which is on pages 15 through 17) will be used for that purpose.

Employees who wish to remain anonymous may report unsafe conditions or hazards by submitting a Safety Suggestion Form (page 6) to the Safety and Health Manager, or their immediate supervisor, without identifying themselves.

Employees must report immediately any unsafe condition or unsafe practice. No employee will be disciplined or discharged for reporting any workplace hazard or unsafe condition. Failure to report any obvious unsafe situation may result in disciplinary action, up to and including termination.

The Safety and Health Manager will insure that Material Safety Data Sheets (MSDSs) are present, up to date, and accessible at the appropriate locations. In addition, the Safety and Health Manager will assure that employees are trained in the Hazard Communication Program before beginning work or changing job functions, and will continuously monitor the work site to assure employees follow safe work practices.

Material Safety Data Sheet Request Form

Please Print!

Company Name: _____

Date of Request: _____

Phone: _____

Street Address: _____

FAX: _____

City/ State / Zip: _____

Requestor's Name: _____

Product Description:

Full Label Name: _____

Manufacturer: _____

Vendor (if known): _____

Address: _____

_____.

Telephone Number: _____

Container Size: _____

Other:

Safety Inspection Checklist

Inspected By: _____ Date: _____

(Mark N/A as appropriate)

1. WORK SITE INFORMATION:

- a. Posting OSHA and other work site warning posters _____
- b. Are Safety Meetings conducted periodically? _____
When was the last meeting? _____
- c. First aid equipment properly stocked _____
- d. Are work site injury records being kept? _____
- e. Are emergency phone numbers conspicuously posted _____
- f. Is the EMERGENCY INFORMATION form posted? _____

(Page 8)

Describe Violation – Location – Remedy Taken

2. HOUSEKEEPING AND SANITATION :

- a. Are emergency lights fully operational? _____
- b. General neatness of working areas _____
- c. Regular disposal of waste and trash _____
- d. Passageways and walkways clear _____
- e. Waste containers provided and used _____
- f. Sanitary facilities adequate and clean _____
- g. Adequate supply of water _____
 - h. Adequate lighting _____
- j. Are handrails and stair treads in good repair? _____
- k. Is smoking restricted to certain locations? _____
- l. Are electrical cords and plugs in good condition? _____
- m. Is a clearance of 3' maintained around hot water heaters electric breaker panels, heating units, and fire sprinkler riser? _____
- n. Are electric circuit breakers free of obstructions? _____

Describe Violation – Location – Remedy Taken

3. FIRE PREVENTION:

- a. Fire instruction to personnel _____
- b. Fire extinguishers identified, accessible, and fully charged _____
- c. "No Smoking" signs posted and enforced where needed _____
- d. Good housekeeping _____
- e. Storage, use and handling of flammable liquids properly done _____

- f. Fire hazards checked _____
- g. Is gasoline contained only in UL listed containers? _____

Describe Violation – Location – Remedy Taken

4. HANDLING AND STORAGE OF MATERIALS:

- a. Are materials properly stored and stacked? _____
- b. Are passageways clear? _____
- c. Shelves in stockrooms in good repair and properly anchored _____

- d. Stacks on firm footing, not too high _____
- e. Are employees lifting loads correctly? _____
- f. Are materials protected from weather conditions? _____
- g. Flammable liquids not stored in areas used for exits or stairways _____

Describe Violation – Location – Remedy Taken

5. HAND TOOLS:

- a. Proper tool being used for each job _____
- b. Neat storage, safe carrying _____
- c. Inspection and maintenance _____
- d. Electric tools are grounded _____

Describe Violation – Location – Remedy Taken

6. PERSONAL PROTECTIVE EQUIPMENT:

- a. Eye protection _____
- b. Respirators and masks _____
- c. Helmets, hoods, head protection _____
- d. Gloves, aprons, sleeves _____
- e. Hearing protection _____
- f. Safety harnesses and lifelines _____
- g. Shirts are to be worn _____
- h. Back support belts _____

Describe Violation – Location – Remedy Taken

7. HAZARDOUS MATERIALS:

- a. Is a binder containing MSDS for supplies containing hazardous chemicals available to employees before using? _____
- b. Are “Material Safety Data Sheets are Available on Request” signs posted in conspicuous locations? _____
- c. Is the hazardous waste inventory log maintained? _____
- d. Are hazardous waste storage areas inspected weekly? _____
- e. Is the hazardous material dispositioning log maintained? _____
- f. All containers clearly identified _____
- g. Proper storage practices observed _____
- h. Proper storage temperatures and protection _____
- i. Proper type and number of extinguishers nearby _____

Describe Violation – Location – Remedy Taken

Unsafe acts and/or practices observed

EMERGENCY INFORMATION

(To Be Posted)

FIRE:

Telephone Fire Department: _____
Nearest Alarm Box: _____

Crime:

Telephone Police: _____

Injury/Illness:

Avoid infection of minor injuries; always get medical attention or skilled first aid

Employees who are First Aid and/or CPR Certified

Doctor _____

Office _____ Phone _____

Residence _____ Phone _____

Hospital _____

Address _____ Phone _____

Ambulance _____

Address _____ Phone _____

In all cases of Fire, Crime, Accident, or Sickness, promptly notify:

1. Name _____ Office Phone

_____ Home Phone

2. Name _____ Office Phone

_____ Home Phone

Additional Numbers: _____
(Alarm Company., Office Phone, etc.)

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Employee Safety Handbook

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Safety Handbook Acknowledgement

Name

Date of Hire

Signature

Date

(Remove and retain this sheet in the Employee's Personnel File)

Table of Contents

UT/IJP Safety Policy

Safety and Health Requirements

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Fire Safety

Hand Tool Safety

Protective Equipment

Material Handling Safety Rules

Housekeeping

Employee Safety Handbook

At UT/IJP, our most valued resources are our employees, our customers, and the communities we serve. We are dedicated to providing a safe and healthful environment for employees and customers, protecting the public, and preserving UT/IJP properties and assets. Injuries can be prevented. In order to achieve an accident free workplace, an organized and effective Safety Program must be carried out company wide to make this policy work.

The Safety and Health Program will assist management and employees in controlling hazards which will minimize employee and customer injuries, damage to customer's property and damage to UT/IJP property.

All employees will follow this program

Please take the time to study and understand these safety policies and procedures. It is your responsibility (and ours) to make this program work. You are a valued member of the team, and we care about your safety.

Safety and Health Requirements

All employees will comply with the provisions of the OSHA Health Act of 1970. Therefore, any employee who, knowingly commits an unsafe act or creates an unsafe condition, disregards the safety policy, or is a repeated safety or health offender, will be discharged. Grounds for immediate discharge are:

- 1) Drinking alcohol, and/or drug abuse prior to or during working hours
- 2) Fighting
- 3) Theft
- 4) Willful damage to property
- 5) Failure to wear eye protection, hearing protection, safety helmets, etc.
- 6) Not using safety harness and lanyards when there is a potential for falling
- 7) Removing and/or making inoperative safety guards on tools and equipment
- 8) Removing barriers and/or guardrails and not replacing them
- 9) Failure to follow recognized industry practices
- 10) Engaging in dangerous horseplay
- 11) Failure to notify UT/IJP of a hazardous situation

The following safety and accident activities will be adhered to:

- 1) Report all injuries immediately to your supervisor
- 2) Notify your supervisor should you become ill while on the job
- 3) Inform you supervisor if you have a disability or physical handicap
- 4) Never move an injured or ill person, unless to prevent further injury

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Minor safety violations will be documented and a copy of the below form will become part of the employee's personnel record:

<u>Safety Hazard Citation</u>	Date: _____
Name of Violator:	_____
Location of Violation:	_____
Type of Violation:	_____ _____ _____
Violator's Signature:	_____

Accident and Incident Reporting

It is important that you report all accidents and incidents that result in injury, illness, or damage (however slight), to your supervisor immediately. UT/IJP can learn how to prevent them from occurring in the future. It is UT/IJP responsibility to investigate each incident, and your responsibility to report them when they occur.

First Aid and Medical Treatment

UT/IJP provides a First Aid Kit on the premises. It is there for your use in the treatment of minor scratches, burns, headaches, nausea, etc. Ask your supervisor to show you its location. Let your supervisor know if you need to use the First Aid Kit.

If you have a work related injury or illnesses that requires professional medical assistance notify your supervisor and let him/her know before you receive this assistance. If you fail to notify your supervisor, you may be ineligible for Worker's Compensation, benefits to pay for doctor's bills, and/or lost wages.

FIRST AID PROCEDURES AND INSTRUCTIONS

In all cases requiring emergency medical treatment, immediately call, or have a co-worker call, to request emergency medical assistance.

EMERGENCY PHONE NUMBERS

Safety and Health Manager: _____ **Poison Control:** _____

First Aid: _____ **Fire Department:** _____

Ambulance: _____ **Police:** _____

Medical Clinic: _____

Clinic Address: _____

MINOR FIRST AID TREATMENT

First aid kits are stored in the _____ . If you sustain an injury or are involved in an accident requiring minor first aid treatment:

- Inform your supervisor.
- Administer first aid treatment to the injury or wound.
- If a first aid kit is used, indicate usage on the accident investigation report.
- Access to a first aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the accident investigation report.

NON-EMERGENCY MEDICAL TREATMENT

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the accident investigation report.

Emergency Medical Treatment

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance from a co-worker.
- Use the emergency telephone numbers and instructions posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
- Provide details for the completion of the accident investigation report.

FIRST AID TRAINING:

Each employee will receive training and instructions from his or her supervisor on our first aid procedures.

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WOUNDS:

Minor: Cuts, lacerations, abrasions, or punctures-

- Wash the wound using soap and water; rinse it well.
- Cover the wound using clean dressing.

Major: Large, deep and bleeding

- Stop the bleeding by pressing directly on the wound, using a bandage or cloth.
- Keep pressure on the wound until medical help arrives.

BROKEN BONES:

- Do not move the victim unless it is absolutely necessary.
- If the victim must be moved, "splint" the injured area. Use a board, cardboard, or rolled newspaper as a splint.

BURNS:

Thermal (Heat)

Rinse the burned area, without scrubbing it, and immerse it in cold water; do not use ice water.

Blot dry the area and cover it using sterile gauze or a clean cloth.

Chemical

Flush the exposed area with cool water immediately for 15 to 20 minutes.

EYE INJURY:

Small particles

Do not rub your eyes.

Use the corner of a soft clean cloth to draw particles out, or hold the eyelids open and flush the eyes continuously with water.

Large or stuck particles

If a particle is stuck in the eye, do not attempt to remove it.

Cover both eyes with bandage.

Chemical

Immediately irrigate the eyes and under the eyelids, with water, for 30 minutes.

NECK AND SPINE INJURY:

If the victim appears to have injured his or her neck or spine, or is unable to move his or her arm or leg, do not attempt to move the victim unless it is absolutely necessary.

HEAT EXHAUSTION:

Loosen the victim's tight clothing.

Give the victim "sips" of cool water.

Make the victim lie down in a cooler place with the feet raised.

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Workers' Compensation

Every state has a Workers' Compensation Law to provide benefits to employees for lost wages and medical bills resulting from a work related injury or illness. You are covered under Workers' Compensation. You may request Workers' Compensation benefits from your supervisor. Qualification for benefits is determined by the state, not UT/IJP. Your responsibilities are to keep appointments, follow all doctors' instructions on and off the job, maintain good communication with your supervisor, and to fully cooperate with all instructions you are given.

Workers' Compensation provides wages at a lower pay scale than what you may earn by working

Doesn't it make sense to be safe so that you don't have to be out on Workers' Compensation?

Your Safety Rights

You have several important rights concerning safety, which are protected by federal, state and local laws that you should be aware of. They are:

- The right to a safe work-place free from recognized hazards
- The right to request information on safety and health hazards in the workplace, precautions that may be taken, and procedures to be followed if an employee is injured or exposed to toxic substances.
- The right to know about the hazards associated with the chemicals you work with, and the safety procedures you need to follow to protect yourself from those hazards.
- The right to question any instruction which requires you to disobey a safety rule, which puts you or someone else in unnecessary danger of serious injury, or requires you to perform a task which you have not been trained to safely perform.
- The right of freedom from retaliation for demanding your safety rights.

Your Safety Responsibilities

You also have some important responsibilities concerning safety. These are:

- The responsibility of reporting all injuries and illnesses to your supervisor, no matter how small.
- The responsibility of always following the safety rules for every task you perform,
- The responsibility of reporting any hazards you see.
- The responsibility of helping your co-workers recognize unsafe actions or conditions they cause.
- The responsibility of asking about the safety rules you are not sure about.

Employee Safety Rules

It is impossible to list or include all safety rules for all the possible tasks you may have to do. But the following rules have been prepared to help you avoid hazards, which may cause injury while doing some of the more common tasks you may be asked to do. You should study and follow the rules provided in this booklet, and to ask your supervisor for additional rules when asked to do a task you are not familiar with, and this booklet does not cover. Failure to follow safety rules and /or safe practices will result in disciplinary action, up to and including termination.

GENERAL SAFETY RULES:

- Read and follow the safety notices and other information that is posted.
- Observe and follow all safety instructions, signs, and operation procedures.
- Help your fellow employees when they ask for assistance or when needed for their safety.
- Never participate in “horseplay”. Horseplay that results in injury is often not covered by Workers’ Compensation.
- Clean up spills immediately.
- Report all unsafe conditions, hazards, or equipment immediately. Make sure other people are warned of the problem so that they may avoid it.
- Wear personal protective equipment as required to reduce injury potential. Use gloves, safety glasses, back support belts, etc., as necessary.
- Never stand on chairs, furniture, or anything other than an approved ladder or step stool.
- Never use intoxicating beverages or controlled drugs before or during work. Prescription medication should only be used at work with your Doctor’s approval.

FIRE SAFETY:

- Report all fire hazards to your supervisor immediately.
- Fire fighting equipment shall be used only for fire fighting purposes.
- Smoking is not permitted at any time in the areas where “No Smoking” signs are posted.
- Do not block off access to fire fighting equipment.
- Keep doors, aisles, fire escapes and stairways completely unobstructed at all times.
- In the case of a fire, your first consideration must be the safety of all persons, then attention should be directed to the protection of property.
- Change clothes immediately if they are soaked with oil, gasoline, paint thinner or any other flammable liquid.
- Know how to report a fire and how to turn on a fire alarm.
- Know the location of all fire extinguishers, and how to use them.
- Know the fire exits to be used in an emergency.

HAND TOOL SAFETY:

- Wear protective equipment necessary for the job you are performing. Discuss any required safety equipment with your supervisor as changes occur.
- Defective tools must not be used.
- Do not carry sharp hand tools in clothing.
- Check all wiring on electric hand tools for proper insulation and 3-prong plug grounding.
- **Hammers:** Use eye protection at all times!

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- **Screwdrivers:** Use the right size and type of screwdriver for the job. Do not use a screwdriver as a chisel.
- **Wrenches:** In using any wrench, it is better to pull than to push. If you have to push, use your open palm. Use the proper wrench for the job.
- **Handsaws:** Saws that are sharp and rust free are less likely to bind or jump. Insure the object being cut is secured tightly to a flat surface.

PROTECTIVE EQUIPMENT:

- Approved eye protection (safety glasses with side shields, goggles, etc.) must be worn at all times when assigned any certain job classifications. It is important to check with your supervisor to assure compliance.
- Moccasins and shoes with open toes or high heels are not permitted.
- Wear protective clothing and equipment as required by your job classification to protect against hazards at hand. These include, but are not limited to, hard hats, steel toed shoes, gloves, fall safety harnesses, ear plugs, etc.

MATERIAL HANDLING SAFETY RULES:

- When lifting, lift properly. Keep the back straight, stand close to the load, and use your leg muscles to do the lifting, keeping the load close to the body. Never twist your upper body while carrying a load.
- When lifting heavy objects, utilize a two-wheeled dolly, or, ask for assistance from another employee.
- Inspect the object you are going to lift for sharp corners, nails, black widow spiders, or other things that may cause injury.
- Use gloves when handling rough or sharp materials.

HOUSEKEEPING:

- Do not place materials in aisles, stairways, or any designated path of travel.
- Stack material at a safe height so that material will not fall if bumped. Insure heavy loads have proper support, and make sure there is no overhanging or irregular stacking of material.
- Place all trash or scrap in places provided. Clean up all spills immediately.
- Report worn or broken flooring, stair treads, handrails, furniture, or other office equipment.
- Smoking is permitted only in designated areas. Use ashtrays for disposing of butts. Do not throw butts on the floor.

Personal Protective Equipment

Purpose:

To establish the policy for employees to wear Personal Protective Equipment.

Policy:

UT/IJP is dedicated to providing a safe and healthy workplace. All employees are expected to do their part to achieve this goal. Employees can do their part by using the proper Personal Protective Equipment (PPE) provided them.

Personal Protective Equipment will be provided, used and maintained in a sanitary and reliable condition wherever it is necessary to prevent injury. Personal Protective Equipment requirements include, but are not necessarily limited to the items below:

Protective Headwear:

Where there is the exposure of overhead danger from falling objects or from electric shock or burns, protective headwear must be worn. Protective headwear is an approved hard hat that meets the requirements of the American National Standards Institute (ANSI Z889.1-1969).

Protective headwear will be issued to the required employees. Employees are responsible for using their hard hats while working. Also, employees must notify their supervisor about a damaged or lost hardhat immediately.

Protective Eyewear:

When there is an exposure to the eyes from flying objects, glare or liquids, protective eyewear is required. Protective eyewear is an approved safety eye protector or safety goggle, which meets the standards of the American National Standards Institute (ANSI Z87.1-1968).

Protective eyewear will be issued to the required employees.

Disposable Dust Masks:

When there is the potential of exposure to airborne nuisance dust or particles, disposable dust masks are required.

Protective Gloves:

- When there is an exposure to the hands, protective gloves are required. Protective gloves are construction type work gloves and chemical resistive gloves.
- Construction type work gloves are required for, but not limited to, employees that have an opportunity of cutting, pinching, hitting, or burning their hands.
- Chemical resistive gloves are required for, but not limited to, employees that have an opportunity of spilling hazardous chemicals or corrosive material onto their hands.

Back Supports:

When employees are exposed to heavy lifting or repetitive lifting, back support devices are required.

Machinery Tag Out Program

Purpose:

This policy and procedure establishes the minimum requirements for UT/IJP Machinery Tag Out Program. It governs lock out and/or tag out procedures to be used to verify that equipment or machines are isolated from all potentially hazardous energy. Machinery is to be locked out or tagged out before employees perform any servicing or maintenance activities where the unexpected energizing, start up or release of stored energy could cause injury.

Policy:

Procedures described apply to all electrical equipment and machinery connected to an energy source by either hard wire or other permanent connection (hydraulic lines, electrical, etc.) that is repaired, serviced, or maintained by UT/IJP personnel. The Machinery Tag Out Program applies to all equipment or machinery operated by mechanical, hydraulic, pneumatic, chemical, thermal, or other energy resources where the unexpected energizing could cause injury to employees or customers.

Circuit breakers disconnect switches, and other energy isolating devices used to control the flow of energy to the machine/equipment must be operated in such a manner as to shut off or “isolate” all energy to the machine.

Definitions:

- ❖ **Energy Source-** Any source of electrical, mechanical, hydraulic, chemical, thermal, or any other energy source.
- ❖ **Energized-** Connected to an energy source or containing residual or stored energy.
- ❖ **Energy Isolating Device-** A mechanical device that physically prevents the transmission or release of energy (for example, circuit breaker, disconnect switch, slide gate, line valve, etc.)
- ❖ **Lock out-** Placing a lock out device on an energy isolating device to shut down it's flow of energy.
- ❖ **Lock out device-** A device such as a lock, either combination or key type, to hold an energy isolating device in the “safe” position and prevent energizing of a machine or equipment.

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- ❖ **Tag out-** Placing a tag or sign on an energy isolating device indicating that the
- ❖ equipment shall not be operated until the tag out sign is removed.

- ❖ **Tag out device-** A prominent warning device or sign that can be attached to the
- ❖ energy isolating device. Tags will state the following:
DANGER-DO NOT OPERATE

Initial Training:

Employees involved in the use of this Machinery Tag Out Program must receive training in the requirements of this program upon initial assignment. The Safety and Health Manager is responsible for verifying that training is completed as required by this program.

Authorized employees will be trained in the recognition of hazardous energy sources present at the location they work, the type and magnitude of the energy available in the workplace, and the methods/means needed for energy isolation and control.

Employees must be trained to recognize when the Machinery Tag Out Program is being implemented and understand the purpose of the procedure and the importance of not attempting to start up or use machinery or equipment that has been locked or tagged out.

When tags are used, employees must be specifically instructed in the following limitations of tags:

- Tags are warning devices: they do not provide physical restraint that a lock out does.

- When a tag or lock is attached, it is not to be removed by anyone without authorization from the employee who placed it on the machine or equipment. They are never to be bypassed, ignored, or defaced.

- Tags must be legible and understandable to be effective.

- Tags and locks, and their means of attachment must be made of material that will withstand the working environment where the tags will be used.

- Tags and locks must be attached securely so they cannot inadvertently be detached during use.

- Tags evoke a false sense of security. They are only part of the entire Machinery Tagout Program.

Machinery Tag Out Program Inspection Form

This form will be used when inspecting the Tag Out/ Lock Out Procedure

Inspector's Name _____ Date _____

MACHINERY / EQUIPMENT INSPECTED

COMMENTS

- | | |
|-----------|--------|
| 1. _____ | _____. |
| 2. _____ | _____. |
| 3. _____ | _____. |
| 4. _____ | _____. |
| 5. _____ | _____. |
| 6. _____ | _____. |
| 7. _____ | _____. |
| 8. _____ | _____. |
| 9. _____ | _____. |
| 10. _____ | _____. |

I hereby certify that I have inspected the Lock Out/Tag Out procedure for the above listed equipment, have interviewed operators of such equipment and determined that compliance with UT/IJP Lock Out/Tag Out procedure is satisfactory.

Inspectors Signature

Date

Hazard Prevention and Control

UT/IJP shall undertake efforts as outlined in this section to correct or control potential hazards in a timely manner.

UT/IJP will implement methods to eliminate the hazard, and will implement procedures for safe work. Safe work will be done through training, correction of unsafe performance, and compliance through the disciplinary system.

Identified Safety and Health Concerns:

All identified potential workplace safety and health hazards should be reported to the Safety and Health Manager, or a member of management. Situations that are unsafe, or posing as a safety and health hazard, will be reviewed and reported to management for corrective action.

Newly Identified Safety and Health Concerns:

Anytime a new substance, procedure, equipment, or process is introduced into the workplace, which creates or is reported to create an unsafe condition or situation, the Safety and Health Manager will evaluate the substance, procedure, equipment, or process. Employees will have an opportunity to submit their recommendations and suggestions regarding new workplace hazards at any time.

Hazards Which Create a Risk of Imminent Harm:

When a hazard exists which UT/IJP cannot control or abate immediately without endangering employees and /or property, all exposed personnel will be removed from the immediate area of potential exposure, except those employees that are necessary to correct the hazardous condition. All employees involved in correcting the hazardous situation will receive appropriate training and/or instruction in how to do so. They will also be provided with the appropriate personal protective equipment.

Hazards Which Do Not Create a Risk of Imminent Harm:

Unless there are factors beyond UT/IJP reasonable control, such hazards are to be abated within 5 days or less.

Housekeeping:

Good housekeeping is an integral part of any effective safety program. Keeping work areas neat and clean reduces the potential for accidents and injuries. Each employee is responsible for keeping his or her work area neat, orderly, and free of any hazardous condition.

Property Maintenance

Purpose:

To establish the policy for property maintenance.

Policy:

UT/IJP goal is to provide its customers and employees with a safe facility. The following guidelines will help management determine if needed repairs are necessary.

Guidelines for Property Maintenance and Repair:

Property maintenance and repair will be performed to meet the standards of:

- Safety
- Any applicable codes, including
 - Occupational Safety and Health Administration (OSHA)
 - National Fire Protection Association (NFPA) which include
 - National Electric Code
 - Flammable Liquids Code
 - Life Safety Code
 - National Fuel Gas Code
 - Uniform Fire Code (UFC)
 - Building Officials and Code Administrators International Building Code (BOCA)
 - Americans With Disabilities Act (ADA)
- Continued operation of the business

Management must promptly, as appropriate, fix, repair, train employees, and/or give warnings of safety hazards. Management must promptly fix or repair any item necessary for the continued operation of the business. In the event an accident occurs, the Safety and Health Manager will fill out the **Liability Report Form** on the next page, and maintain a record thereof.

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Liability Report Form

Date: _____

Claimant's Name: _____ Age: _____ Phone: _____

Address: _____

Description of Occurrence: _____

Injuries: _____ Medical Care? YES NO

Ambulance? YES NO Hospital or Doctor: _____

Property Damage? YES NO describe same: _____

Is a Product Involved? YES NO Name and Size: _____

Name and Address of Manufacturer: _____

Did Claimant Slip, Fall, or Trip? _____ Was Area Inspected? YES NO

Foreign Matter or Debris Found on Floor? YES NO Describe: _____

Witnesses: Name: _____ Phone: _____

Address: _____

Name: _____ Phone: _____

Address: _____

Photos Taken? YES NO Additional Remarks: _____

Report Prepared By: _____

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Emergency Action Plan

Purpose:

To establish the policy and procedures regarding management's and employee's response to various emergency situations. Examples of an emergency are fire, tornado, earthquake, and bomb threat.

Overview:

The procedures cover the following topics:

- 1. Fire Reporting and Response**
- 2. Evacuation**
- 3. Bomb Threat**
- 4. First Aid**
- 5. Hazardous Material Spill**
- 6. Earthquake**
- 7. Robbery**

Policy:

UT/IJP has developed plans that address emergency situations that may arise in UT/IJP locations and which may threaten human health and safety, and damages UT/IJP assets. Management is responsible for implementing the Emergency Action Plans. These Emergency Action Plans will meet the following objectives:

1. Provide a means of notifying employees, customers and local authorities of an emergency situation.
2. Provide for a safe and orderly method of evacuation of employees and customers from UT/IJP premises.
3. Account for all employees who occupied UT/IJP premises at the time of evacuation, should one occur.

Emergency Action Plans will:

4. Provide emergency first aid treatment or summon emergency medical assistance for injured individuals.
5. Provide training and needed information to those employees responsible for taking action in the event of an emergency.

Signs as required by ordinance, regulation, or law will identify emergency exits. Employees are required to be familiar with the location(s) of alarm pull stations and emergency exits.

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Training on Emergency Action Plans will take place during new employee orientation, when changes occur in the action plans, and periodically as coordinated by the Safety and Health Manager.

Smoking is never allowed anywhere on UT/IJP premises during an emergency

If hazardous materials are involved, disposal must be done in compliance with federal, state, and local environmental laws.

Procedure:

I. Fire Reporting and Procedure:

If a fire alarm or alert is sounded or a fire is reported by an employee, regardless of the reason for the alarm or the severity of the fire, the following action must be taken immediately:

Senior Management

1. Immediately notifies the Fire Department by dialing 911 (where applicable) or the local fire emergency number: _____.
2. Gives UT/IJP name, address, and area where the fire is located.
3. Assigns an employee to wait for the fire department outside UT/IJP and direct them to the fire's location.
4. Announces evacuation instructions over the public address system. "Ladies and Gentlemen. UT/IJP is being temporarily closed. We request that you leave by the nearest exit immediately. Thank you."
5. Once outside UT/IJP, takes a head count of employees to insure all were safely evacuated. Double checks that all individuals are out of UT/IJP premises.

Note: When one or more employees are unaccounted for, employees are not to re-enter the building to conduct a search. Notify the ranking fire or other emergency response official on the scene and their approximate location.

Immediately after the fire, notify the President of UT/IJP and all other management individuals. Coordinate any salvage and repair operations.

Employee

1. If trained in the use of fire extinguishers, may attempt to suppress a small fire, until relieved by the Fire Department or until it becomes apparent that the fire cannot be controlled by fire extinguishers.

Note: Employees should never attempt to control a fire, which endangers their health. They must immediately evacuate the area when it becomes apparent that the fire cannot be controlled or when conditions become more hazardous.

II. Evacuation:

Senior Management 1. Telephones the local emergency agency (for example, fire, police, hazardous materials team, etc.).

2. Makes the following announcement on the public address

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system, "Ladies and Gentlemen. UT/IJP is being temporarily closed. Please leave by the nearest exit immediately. Thank you." Make this announcement twice, and repeats it every minute or more frequently if needed.

3. Checks all areas of their respective departments, restrooms, and public areas to verify that employees and individuals are evacuated.

Senior Management 4. Secures all cash, checks, and charge documents in the safe if time permits.

5. Designates a safe area outside UT/IJP as a gathering point for all employees. Takes a head count of employees to insure all were safely evacuated.

Note: Employees are not to re-enter the building. Management will notify the ranking fire or other emergency response official on the scene of a potentially trapped person and their approximate whereabouts.

6. Dismisses all non-essential employees.

7. Telephones the President of UT/IJP and all other management personnel.

II. Bomb Threat:

When someone calls and says there is a bomb in the building, the following steps will be performed:

Employee

(Receiving Threat)

1. Keeps the caller on the line as long as possible. Asks them to repeat the message. Tries to write down every word spoken by the caller.
2. Asks the caller where the bomb is located and when it will go off.
3. Tells the caller that the building is occupied and detonation of a bomb could result in the death and injury to innocent people.
4. Pays particular attention to background noises, such as music playing, engine noises, etc.
5. Listens to the voice, male, female, voice quality, accent, and speech impediments.

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6. When the caller hangs up, **do not hang up the phone!** Sometimes, phones can be traced back to the source. Immediately notify management and describe the threat.

Senior Management 7. Calls the local Police or Fire Department to report the Incident. Follows all recommendations and instructions provided by either department.

5. If the Police or Fire Department declines to give instructions to evacuate the building, search the premises (if time permits) for any suspicious looking device or package. If one is found, follow the Evacuation Plan. **Do not touch any suspicious device or package.**

III. First Aid:

If an employee / individual is injured, the initial responsibility of management is to provide the needed first aid or arrange for emergency medical response or professional medical care.

- Senior Management
1. Treats the injured individual using the supplies from UT/IJP first aid kit.
 2. In the event an employee is seriously injured and requires professional medical care, drive the employee to a medical provider. If any individual is not mobile or has a life threatening injury or illness, arrange for emergency care and transportation (call 125).

IV. Hazardous Material Spill:

Management will respond to incidental releases of hazardous substances when the substance can be absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate area or by maintenance personnel. If a large spill or fire occurs that is not controllable, Management will contact the appropriate local authorities, such as the Fire Department.

V. Earthquake:

All employees must be aware of the potential for earthquakes and the resulting damage to buildings and facilities.

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A. During an Earthquake:

Employee
entering

1. If indoors, stay indoors; if outdoors, stay outdoors.
In earthquakes, most injuries occur as people are
or leaving buildings.

1.a. If indoors:

- 1) Take cover beneath a desk, table, bench or in doorways, halls or against an interior wall.
- 2) Stay away from glass windows and glass doors, and away from containers having hazardous material stored.

1.b. If outdoors:

- 1) Move away from buildings and all structures, and all overhead electrical wires.
- 2) If operating a vehicle, stop as soon as possible, but stay inside the vehicle.

B. After an Earthquake:

Senior Management

1. Coordinates first aid efforts.
2. Turns on the radio to get emergency information from local authorities.
3. Check natural gas lines for leaks. If a leak is detected, shuts down the system, and notifies the local gas service company.
4. Shuts off the electrical current at the main breaker box if Power has been interrupted.
4. Directs employees and individuals to a safe assembly area outside the building.
5. Takes a head count to insure all employees were safely Evacuated.
6. Does not permit individuals to enter the building again until cleared by authorities.
7. Assigns duties to clean up damage and resume business as soon as possible.

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VI. Robbery:

In the event a robbery occurs, the main objective is to reduce the risk of injury to employees and individuals and to get the robber out of the building as soon as possible.

- | | |
|-------------------|---|
| Employee | <ol style="list-style-type: none">1. Be attentive and calm. Listen to the robber and do exactly what he/she asks you to do.2. Do give up money as demanded.3. Remain alert. Try to remember details of the robber's appearance, clothing, speech, etc.4. If possible, watch the robber's method and direction of escape.5. Expect foul/strong language. Expect to lie on the floor.6. Do not make any sudden movements.7. Don't overreact. Do not grab for the weapon or call for help.8. Do not argue.9. After the robbery, write everything down. |
| Senior Management | <ol style="list-style-type: none">10. Call the Police11. Call the President of UT/IJP12. Have all witnesses write everything they can recall. |

OSHA Inspection

Purpose:

To establish the policy for all managers to follow if an OSHA Compliance inspection will be conducted.

Overview:

The Occupational Safety and Health Administration (OSHA) is authorized to conduct workplace inspections to determine whether employees are complying with standards issued by the agency for safe and healthful workplaces. Many States have their own occupational safety and health programs, and regularly inspect workplaces. Inspections are usually conducted without advance notice and can be conducted for one or more of the following reasons:

- Imminent Danger Situations – Any condition where there is reasonable danger that a situation exists that can be expected to immediately cause death or serious harm.
- Catastrophes and Fatal Accidents – Investigation of fatalities and accidents resulting in the hospitalization of 3 or more employees. Such catastrophes must be reported to OSHA within 8 hours.
- Employee Complaints
- Programmed Inspections – Based on injury rates, previous citation history, and employee exposure to toxic substances or random computerized selection.

This policy details the phases of an OSHA compliance inspection, the response and attitude of management to an inspection and steps to insure completion of the appropriate follow-up corrective action.

Policy:

UT/IJP policy is to demonstrate “**good faith**” effort to comply with all OSHA standards and any health and safety issues raised in an OSHA compliance inspection.

Management is responsible for implementing this policy and correcting all health and safety deficiencies revealed during compliance inspections. The Safety and Health Manager will provide technical assistance and coordination of corrective action, as required.

Admitting an OSHA Compliance Officer:

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If an OSHA compliance inspector requests to conduct an inspection, the senior management member is to ask to see the officer's credentials. An OSHA inspector carries either U.S. or the state's Department of Labor credentials bearing their photograph and a serial number. In every case, verify the authenticity of the compliance inspector's identification by calling the nearest OSHA office.

Note: DO NOT REFUSE THE COMPLIANCE OFFICER ADMITTANCE.

The senior management member is to contact the Safety and Health Manager immediately.

If UT/IJP requires a Search Warrant, inform the OSHA compliance officer before the opening conference begins. UT/IJP rights to challenge a warrant may be lost if it permits the inspection to proceed.

OSHA Facts:

An OSHA Inspection is divided into three parts:

1. The Opening Conference
2. The Walk Around Inspection
3. The Closing Conference

There are no time limits specifying how long an inspector may remain on the premises.

Violations are considered to be "alleged violations" until they become a final order of the Occupational Safety and Health Review Commission.

1. UT/IJP may contest (appeal), in writing any part of the citation within 15 working days after it has received it.
2. The citation must be posted in the work place for three days following its receipt or until the condition creating the alleged violation is corrected.
3. Management will ask for clarification about any point(s) an inspector raises that they don't understand.
4. Management and employees will not admit to violating any safety standard.

If UT/IJP contests (appeals) an alleged violation, copies of the appeal will be posted at the work site.

Opening Conference:

Before inspecting the premises, the OSHA compliance officer will conduct an opening conference at which they will explain:

- The reason for the inspection (for example. employee or individual complaint)
- Purpose of the visit
- Scope of the inspection
- OSHA Standards that apply

The below are listings of all OSHA Standards

OSHA Standards

- 1904, Recording and Reporting Occupational Injuries and Illnesses
 - 1904 Table of Contents/Authority for 1904
 - 1904.1, Purpose and scope.
 - 1904.2, Log and summary of occupational injuries and illnesses.
 - 1904.3, Period covered.
 - 1904.4, Supplementary record.
 - 1904.5, Annual summary.
 - 1904.6, Retention of records.
 - 1904.7, Access to records.
 - 1904.8, Reporting of fatality or multiple hospitalization incidents.
 - 1904.9, Falsification, or failure to keep records or reports.
 - 1904.10, Recordkeeping under approved State plans.
 - 1904.11, Change of ownership.
 - 1904.12, Definitions.
 - 1904.13, Petitions for record keeping exceptions.
 - 1904.14, Employees not in fixed establishments.
 - 1904.15, Small employers.
 - 1904.16, Establishments classified in Standard Industrial Classification Codes (SIC) 52-89, (except 52-54, 70, 75, 76, 79 and 80).
 - 1904.17, Annual OSHA Injury and Illness Survey of Ten or More Employers.
 - 1904.20, Description of statistical program.
 - 1904.21, Duties of employers.
 - 1904.22, Effect of State plans.
 - 1904.30, OMB control numbers under the Paperwork Reduction Act.

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- **Other OSHA Standards with Recordkeeping Requirements**
 - 1910.95, Occupational noise exposure
 - 1910.120, Hazardous waste operations and emergency response
 - 1910.440, Recordkeeping requirements
 - 1910.1000, Toxic & Hazardous Substances
 - 1910.1001, Asbestos
 - 1910.1018, Inorganic arsenic
 - 1910.1025, Lead
 - 1910.1027, Cadmium
 - 1910.1028, Benzene
 - 1910.1029, Coke oven emissions
 - 1910.1030, Bloodborne pathogens
 - 1910.1043, Cotton dust
 - 1910.1044, 1,2-dibromo-3-chloropropane
 - 1910.1045, Acrylonitrile
 - 1910.1047, Ethylene oxide
 - 1910.1048, Formaldehyde
 - 1910.1050, Methylenedianiline
 - 1910.1051, 1.3-Butadiene
 - 1910.1052, Methylene Chloride
 - 1910.1450, Occupational exposure to hazardous chemicals in laboratories
 - 1913.10, Rules of agency practice and procedure concerning OSHA access to employee medical records
 - 1915.7, Competent person
 - 1915.1001, Asbestos
 - 1919.11, Recordkeeping and related procedures concerning records in custody of accredited persons
 - 1919.12, Recordkeeping and related procedures concerning records in custody of the vessel.
 - 1925.3, Records
 - 1926.60, Methylenedianiline
 - 1926.62, Lead
 - 1926.65, Hazardous waste operations and emergency response
 - 1926.800, Underground Construction
 - 1926.1091, Recordkeeping requirements
 - 1926.1101, Asbestos
 - 1926.1127, Cadmium
 - 1960, Federal employees
 - 1960.66, Purpose, scope and general provisions
 - 1960.67, Log of occupational injuries and illnesses
 - 1960.68, Supplementary record of occupational injuries and illnesses
 - 1960.70, Reporting of serious accidents
 - 1960.71, Locations and utilization of records and reports

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- 1960.72, Access to records by Secretary
- 1960.73, Retention of records
- 1960.74, Agency annual reports

- **Preambles to OSHA Standards**
 - Reporting of Fatality or Multiple Hospitalization Incidents.

- **OSHA Directives**
 - CPL 2.80, Handling of Cases To Be Proposed for Violation-By-Violation Penalties, (1990, October 21), 15 pages. Includes procedures for record keeping violations.
 - CPL 2.91, Enhanced Verification of Records, (1990, May 13), 6 pages.
 - CPL 2-2.46, 29 CFR 1913.10(b)(6), Authorization and Procedures for Reviewing Medical Records, (1989, January 5), 5 pages.
 - CPL 2-2.33, 29 CFR 1913.10, Rules of Agency Practice and Procedure Concerning OSHA Access to Employee Medical Records - Procedures Governing Enforcement Activities, (1982, February 8), 12 pages.
 - CPL 2-2.32, 29 CFR 1913.10(b)(6), Authorization of Review of Specific Medical Information, (1981, January 19), 5 pages.
 - CPL 2-2.30, 29 CFR 1913.10(b)(6), Authorization of Review of Medical Opinions, (1980, November 14), 2 pages.
 - CPL 2.113, Fatality Inspection Procedures, (1996, April 1), 5 pages.

- **Review Commission Decisions**
 - 81-2135, (1985, April 17), 5 pages. Failure to make records available during an inspection.
 - 82-630, (1991, February 15), 9 pages. Making medical records available when a Workers Compensation claim is pending.
 - 82-1016, (1987, March 18), 7 pages. Privacy of OSHA 200 and related records.
 - 89-2614, (1993, February 3), 8 pages. Recording of elevated blood lead levels on the OSHA 200.
 - 90-552, (1992, February 21), 2 pages. OSHA 200 must be maintained at each location.
 - 89-433, (1993, April 27), 9 pages.
 - 90-2179, (1993, April 1), 3 pages. Assessing separate penalties for multiple errors on the OSHA 200
 - 87-0922, (1993, February 5), 25 pages.
 - 88-237, (1994, May 23), 6 pages.
 - 91-0110, (1996, January 19), 6 pages.

- **Standard Interpretations and Compliance Letters**

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There are several hundred Standard Interpretations and Compliance Letters relating directly to the topic of Recordkeeping. Please refer to the Search Page on the "http://www.OSHA.gov" web site. From here you can access these documents either by the specific regulation, or by conducting a search. You can also contact OSHA at one of their regional offices. They will provide you with forms and answers to any questions you may have. Don't hesitate to use them as a valuable resource.

Senior Management must arrange for the following to attend the opening conference:

- The President of UT/IJP
- Other Personnel, as directed

Management must request copies of all applicable safety and health standards as well as a copy of any employee complaint.

The Walk Around Inspection:

After the opening conference, the OSHA compliance officer will go through the facility to inspect for safety and health hazards. At a minimum, the OSHA compliance officer will likely ask for documentation of the following:

- Compliance with the hazard communication standard.
- Compliance with the lockout/ tagout standard.
- Record keeping for employee training
- The employee written safety and health management program

When senior management members and other UT/IJP employees accompany an OSHA compliance officer on an inspection, they should be respectful while firmly standing up for UT/IJP rights and viewpoints. The conduct of UT/IJP personnel shall be in accordance with the following guidelines:

- Do not physically interfere with the OSHA compliance officer when they are making the inspection
- Do not give false or misleading information.
- Accompany the OSHA compliance officer at all times during the inspection.
- Answers to an OSHA compliance officer's questions are to be responsive to the question asked. Do not offer any information beyond the scope of the question. Avoid making any statement that could be construed as an admission of a violation of any recognized health standard.
- Do not discuss with the OSHA compliance officer any previous safety inspections.

The conduct of UT/IJP personnel shall be in accordance with the following guidelines (continued):

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- If the OSHA compliance officer wants to take photographs, senior management must request copies of the photographs. Senior management will also take photographs of the area from the same and different angle.
- Watch and take notes regarding all activities of the OSHA compliance officer. Notes should be detailed and should include such pertinent information as to the name(s) of the OSHA compliance officer(s), time of arrival, activities of OSHA compliance officer, amount of time spent at each location, comments about violations and potential citations, who was interviewed, what was said, etc.
- Immediately correct minor but apparent safety problems in order to help establish UT/IJP “**good faith**” effort to comply with all OSHA health and safety standards.
- The OSHA compliance officer cannot and will not act in a consultative capacity. If they see or if UT/IJP personnel points out a violation, the OSHA compliance officer must issue a citation.

Closing Conference:

After the walk around inspection, a closing conference is held with the OSHA compliance officer, senior management, and any employee representative. The OSHA compliance officer will discuss all unsafe and unhealthy situations observed and will identify all applicable sections of the standards which may have been violated. Management will insure that all violations are understood. When appropriate, Management will produce records to show compliance efforts and fully explain any difficulties that will be encountered in the correction of safety hazards. Management and employees will not admit violation or indicate how long it will take to correct a potential violation.

Post Inspection Activities:

Time limits to correct violations generally range from 5 to 30 days, unless an extension is requested. Time limits will be given in person at the closing conference or mailed within 30 days in a written report of the inspection findings. Follow-up action will be documented in writing, by senior management, listing specific action steps, the individual accountable, and the target date for completion. Management is responsible for completing all corrective action.

OSHA inspection reports, UT/IJP response, and all correspondence to and from OSHA will be retained permanently by the Safety and Health Manager.

Questions an OSHA Compliance Officer Might Ask

Administrative Interview

1. Do you have a written Hazard Communication Plan?
29CFR 1910.1200 requires employers to have a written plan which describes how the training, labeling, MSDS management and other requirements of "Right-to-Know" will be met. More citations and fines are given for this than anything else.
2. Do you have a complete written inventory (list) of hazardous materials?
29CFR 1910.1200 requires employers maintain a current list of all hazardous materials used in the workplace. This list must be accessible to employees.
3. Has a specific person been assigned responsibility for your safety program?
29CFR 1910.1200 and other regulations require that you assign responsibility for various aspects of the safety program. Some states specifically require that employers name a person with overall safety responsibility.
4. Do you have a formal disciplinary policy relating to safety?
29CFR 1910. Various sections require employers enforce safety rules. Employees may not decide on their own when to follow the rules.
5. Do employees ever complain of headaches, nausea, dizziness or skin problems?
All OSHA standards require that employers evaluate workplace hazards and determine whether material use or employee complaints mean that there is any over-exposure to unsafe conditions. These are typical symptoms of over-exposure.
- 6a. Do employees wear respirators or dust masks?
- 6b. If "Yes": Do you have written respirator procedures?
29CFR 1910.134 requires that if any employee uses a respirator, including a dust mask, written procedures must cover use, fit testing, cleaning and maintenance of the respirator.
- 6c. Do you have records showing fit testing of respirators and training?
29CFR 1910.134 requires employers to test the fit of each respirator on each employee and train the employee to check and properly use the respirator.
7. Do you have written training records?
29CFR 1910.1200, .1450, .1030 and virtually all other OSHA regulations require written training records which document date, subject, attendees and trainer.
- 8a. Do you have more than 10 employees?
- 8b. If "Yes": Do you have a written Emergency Contingency Plan?
29CFR 1910.38 outlines the requirements for an emergency contingency plan for those who employ more than 10 at any one time during the year.
- 8c. Are your Forms 200, 300, 300A and 301 up-to-date and posted from Feb 1 until April 30?
29CFR 1904 requires that employers of more than 10 at any one time in the year maintain occupational illness and injury reports on Form 300 or equivalent and summarize them on Form 300A which is posted from Feb 1 until April 30.
- 9a. Can you reasonably anticipate that any employees will be exposed to human blood this year because of their jobs?

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- 9b. Have you assigned responsibility for first-aid to an employee?
- 9c. If "Yes": Do you have written Bloodborne Pathogen Exposure Control Plan?
- 9d. Have employees been trained in protective equipment and procedures?
29CFR 1910.1030 requires that employers develop an Exposure Control Plan, train employees, keep records, and offer Hepatitis B vaccinations if it can be reasonably anticipated that one or more employees could be exposed to human blood or blood products as a result of doing their assigned duties. If you have assigned first aid responsibilities to an employee you are required to have a Bloodborne Pathogen Program. Special waste management and use of approved disinfectants are also required. The key is "reasonable anticipation". Good Samaritan acts are not covered.

Janitorial & Chemical Storage Area Overview

10. Is the area neat and clean, without spills on the floor?
29CFR 1910.22 requires that all work places be clean, orderly and sanitary.
11. Are there any containers without legible labels?
12. Do all secondary container labels list the product, the hazards and the manufacturer?
29CFR 1910.1200 requires that all containers of hazardous materials be labeled. The manufacturer's label is fine if legible. If materials are moved from the original to a "secondary" container, it must be labeled. The label must include the name of the material, a description of the hazard and the manufacturer's name. Just the name is not enough.
13. Is there an MSDS on hand for each hazardous material?
14. Are MSDSs accessible to all employees at all times?
15. Pick a product. Ask to see the MSDS. Could an employee have found it in 4-5 minutes?
29CFR 1910.1200 requires that employers have an MSDS for each hazardous material. Employees must have access to MSDS's at all times during the work shift and be able to find a specific one in less that 5 minutes without asking for access to the collection.

General Work Areas Overview

16. Is the fire extinguisher tag marked for monthly inspections and service in the last year?
29CFR 1910.157 requires that all portable fire extinguishers be visually inspected monthly and serviced annually. If the tag isn't marked it is difficult to prove inspections.
17. Is the area clean and uncluttered?
29CFR 1910.22 requires that all work places be clean, orderly and sanitary.
18. Are oily rags kept anywhere but in metal cans with closed lids?
29CFR 1910.38 requires employers to identify and correct fire hazards. Oily rags should be kept in a closed metal container.
19. Are coffee, drinks or food kept near any hazardous materials?
29CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where they could be contaminated with toxic or infectious materials.

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20. Are there any unlabeled containers?
29CFR 1910.1200 requires that all containers of hazardous materials be labeled. The manufacturer's label is fine if legible. If materials are moved from the original to a "secondary" container, it must be labeled. The label must include the name of the material, a description of the hazard and the manufacturer's name. Just the name is not enough.
21. Are any respirators stored which are not in bags or cabinets?
29CFR 1910.134 requires that respirators be stored and maintained in a way that they will be cleaned, protected and ready for use. Respirators left in the open may absorb contaminants and become unusable.
22. Are gloves, goggles or safety glasses clean and in good repair?
29CFR 1910.132 requires that safety equipment be maintained in clean and sanitary condition and that it be used only if in good repair. Broken or dirty equipment raises questions in an inspector's mind and leads to a more intensive inspection.
23. Are there extension cords across aisles or walkways?
29CFR 1910.22 requires that all work place be clean, orderly and sanitary. Cords across aisles present a slip and fall hazard as well as a potential electrical hazard.
24. Look at ladders. Are there broken steps or parts in bad repair?
29 CFR 1910.25 requires employers to "inspect ladders frequently and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use"."
25. Are there any broken or missing electrical switch or outlet covers?
29 CFR 1910.305 requires that pull boxes, junction boxes and fittings have plates or covers. Broken plates and covers do not provide adequate protection.

Employee Area Overview

26. Is the OSHA Poster or state equivalent posted?
27. Are emergency phone numbers posted by telephones?
28. Is an evacuation route map posted?
29 CFR 1910.38.
29. Is there a fully stocked first aid kit?
9 CFR 1910.262 requires that there be a first aid kit stocked with supplies appropriate to the situation. It must be continuously stocked for any emergency.
30. Are lunches, snacks or drinks stored in a cabinet or refrigerator with chemicals?
29 CFR 1910.142 requires that no employee be allowed to have food or beverages in an area where it could be contaminated with toxic or infectious materials.

Employee Interview

OSHA uses "performance based" standards for its enforcement of safety regulations. The best program on paper will mean nothing if your employees cannot do the right thing or do not know where to get information. Whether your employees can answer

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questions correctly (or not) is the test OSHA inspectors use to evaluate your compliance with OSHA rules.

31a. Please show me the MSDS for _____ (name a product) _____.

Did the employee answer -- "What's an MSDS?"

31b. Did the employee know where the MSDS's are kept?

31c. Did it take less than 5 minutes for the employee to find the correct MSDS?

29 CFR 1910.1200 Employees should know what an MSDS is and be able to locate a specific one in less than 5 minutes. MSDS's should be indexed and stored in an organized fashion.

32a. When were you last trained on safety issues?

Did the employee say "I don't remember" or "Never"?

32b. Has training been in the last year?

29 CFR 1910.1200 states that "employers shall provide information and training on hazardous chemicals...at the time of their initial assignment and whenever a new hazard is introduced into their work area." Some states also specifically require annual retraining.

33. If you had to evacuate the building where would you go for a head count?

Did the employee know a pre-determined specific place?

29 CFR 1910.38 requires that emergency contingency plans specify the means of accounting for all employees after an evacuation of the facility.

OSHA Record keeping and Posting Requirements

Purpose:

To establish the policy and procedures regarding UT/IJP requirements for compliance with OSHA record keeping and posting guidelines for occupational injuries and illnesses.

Policy:

All locations are to post the “Job Safety and Health Protection” poster (or state equivalent) in prominent places in the workplace.

OSHA requires that employers maintain a record of certain occupational injuries that occur at each business establishment on the OSHA Form Log 300 and 300A: Log of Work-Related Injuries and Illnesses and Summary of Work-Related Injuries and Illnesses. At the end of each year, OSHA requires the summary section of the OSHA Form Log 300A to be posted at each business establishment no later than February 1 and remain in place until April 30. UT/IJP will comply with this requirement. The Safety and Health Manager is responsible for maintaining the information on the log in a current status and distributing the OSHA Form Logs.

The “Job Safety and Health Protection” poster and the Form Log and Summary of Occupational Injuries and Illnesses can be ordered from OSHA, free of charge, at 303-844-1600

Record Retention:

OSHA Form Log, January – November reports can be discarded upon receipt of the next monthly report.

Year-end OSHA Form Log 200, 300, 300A, and 301, retain for 5 years following the year to which they relate

Common OSHA Violations

1. Failing to provide information about the Hazard Communication standard and the actual hazards of the chemical that are present.
2. Not having a Hazard Communication Program.
3. Not having a written fire prevention program.
4. OSHA Log hasn't been properly maintained or is missing.
5. Not having an MSDS for every hazardous chemical in use.
6. Not properly labeling all containers or groups of containers containing hazardous chemicals.
7. Not marking exits or accesses to exits.
8. Improper building design, construction, maintenance or occupancy of a building or structure containing employees.
9. Fire extinguishers not located or mounted in an accessible and safe location or not provided.
10. Failure to provide fire extinguisher training.
11. Improper wiring is present in one of the following ways:
 - Unused openings and electrical boxes not closed.
 - Conductors entering boxes are not protected from abrasion
12. Improperly using a flexible cord in one of the following ways:
 - Flexible cord smaller than a #12 was spliced
 - Solder used to splice a flexible cord
 - Used as a substitute for fixed wiring
 - Ran through holes in the ceiling and/or walls
 - Ran through doorways and/or windows
13. Exposed or non-current carrying metal surfaces of fixed equipment are not grounded.
14. Failing to provide electrical boxes and fittings with an approved cover, or failing to ground metal covers.
15. Disconnects, circuit breakers, and other over-current devices aren't legibly and permanently labeled.
16. Tongue guard on grinder is more than 1/4" from the edge of the stone.
17. Missing or inadequate machine guarding.
18. Work rest is missing or more than 1/8" from a grinding wheel.
19. Not providing a suitable eyewash or shower.
20. Persons without respirators performing tasks that require respirators.
21. Written standard operating procedures governing the use and selection of respirators shall be established.
22. Employers shall make conveniently available protectors suitable for the task to be performed. Protective eye, head, face, body, feet and hand equipment shall be provided when there is reasonable probability of injury.
23. A Platform four feet or more from the ground is not provided with a standard railing (and toe board) where required.
24. Broken or damaged ladders being used.
25. Furniture, barrels, boxes, or other devices used in lieu of ladders.

Blood Borne Pathogens

It is imperative that management photocopies these four pages and gives them to all employees during a training session. All employees shall be trained on the risk of bloodborne pathogens and the proper handling of blood and other bodily fluids.

- What Everyone Needs to Know

Bloodborne pathogens are microorganisms carried by human blood (and other body fluids) and cannot be seen with the naked eye. They can be spread through contact with infected blood. If they get into the bloodstream, an individual may become infected and sick.

Most personnel cannot reasonably anticipate coming into contact with blood during their day-to-day work duties. That's why it's imperative that all personnel understand the danger of exposure to bloodborne pathogens and ways to minimize their risk.

Bloodborne pathogens may be present in blood and other materials, such as:

- body fluids containing visible blood
- semen and vaginal secretions
- torn or loose skin

Bloodborne pathogens can cause infection by entering the body through:

- open cuts and nicks
- skin abrasions
- dermatitis
- acne
- mucous membranes of the mouth, eyes or nose

Workplace Transmission

The most common bloodborne pathogens are HIV, Hepatitis B, and Hepatitis C:

HIV (AIDS)

HIV, the human immuno-deficiency virus, attacks the body's immune system causing it to weaken and become vulnerable to infections that can lead to a diagnosis of acquired immune deficiency syndrome or AIDS.

HIV is transmitted mainly through sexual contact and sharing contaminated needles, but also may be spread by contact with infected blood and body fluids. HIV is NOT transmitted indirectly by touching or working around people who are HIV-positive.

Employees can prevent getting HIV by stopping the passage of the virus from a person who has HIV to them. In many instances, the employee has control over the activities

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that can transmit HIV. Since HIV is most frequently transmitted by sharing needles or through sexual intercourse, employees can stop transmission by refusing to engage in these behaviors.

Hepatitis B

Hepatitis is a general term used to describe inflammation (swelling) of the liver. Alcohol, certain chemicals or drugs, and viruses such as hepatitis A, B, C, D, E and G may cause hepatitis.

- Hepatitis B is a serious, sometimes fatal disease, caused by a virus that infects and attacks the liver. The virus is transmitted through direct contact with infected blood, semen, or vaginal fluid. It is primarily spread through sexual contact.
- In studies that examine transmission following injections into the skin, HBV is 100 times more contagious than HIV.
- **HBV can also be transmitted indirectly because it can survive on surfaces dried and at room temperature for at least a week!** That's why contaminated surfaces are a major factor in the spread of HBV.
- Each year there are up to 200,000 new infections and 5,000 hepatitis B related deaths in the U.S. (compared to 40,000 new HIV infections per year).
- One in approximately 20 persons now has, or will one day have, hepatitis B
- Transmission of hepatitis B is preventable:
 - Use latex condoms during sex
 - Do not share needles
 - Use universal precautions in the workplace
 - Get the hepatitis B vaccination

Hepatitis C

Hepatitis is a general term used to describe inflammation (swelling) of the liver. Alcohol, certain chemicals or drugs, and viruses such as hepatitis A, B, C, D, E and G may cause hepatitis.

- Hepatitis C is a serious, often fatal disease, caused by a virus that infects and attacks the liver. HCV is more common than hepatitis B and ranks slightly below alcoholism as a cause of liver disease.
- However, HCV is not as infectious as HBV because there are generally lower levels of the hepatitis C virus in the blood than of the hepatitis B virus
- HCV is primarily transmitted through blood-to-blood contact -- most commonly through shared needles. The risk of transmitting HCV through sexual contact appears to be low, but precautions should be taken anyway. HCV cannot be transmitted by casual contact such as shaking hands or sharing bathroom facilities.

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- Up to 180,000 people may become infected with HCV each year in the U.S.
- Transmission of hepatitis C is preventable:
 - Use latex condoms during sex
 - Do not share needles
 - Use universal precautions in the workplace
 - HOWEVER, unlike hepatitis B, currently there is NO VACCINE for hepatitis C. And also unlike HBV, there is no drug to prevent HCV infection after an exposure.

Guidelines for Handling Blood and Other Bodily Fluids

Many personnel are concerned that HIV may be spread through contact with blood and other body fluids when an accident occurs at work.

HIV, as noted earlier, has been found in significant concentrations in blood, semen, vaginal secretions, and breast milk. Other body fluids, such as feces, urine, vomit, nasal secretions, tears, sputum, sweat, and saliva do not transmit HIV unless they contain visible blood. However, these body fluids do contain potentially infectious germs from diseases other than AIDS. **If an individual has contact with any of these body fluids, they are at risk of infection from these germs.** It should be remembered that the risk of transmission of these germs depends on many factors, including the type of fluid contacted, the type of contact made, and the duration of the contact.

Very simply, it is good hygiene policy to treat all spills of body fluids as ***infectious*** in order to protect personnel from becoming infected with any germs and viruses. The procedures outlined below offer protection from all types of infection, and should be followed routinely.

How Should Blood and Body Fluid Spills be Handled?

Whenever possible, employees shall wear disposable, waterproof gloves when they expect to come into direct hand contact with body fluids (when treating bloody noses, handling clothes soiled by incontinence, or cleaning small spills by hand). Gloves used for this purpose shall be put in a plastic bag or lined trash can, secured, and disposed of daily. Hands should always be washed after gloves are removed, even if the gloves appear to be intact.

If an employee has unexpected contact with body fluids or if gloves are not available (for example, applying pressure to a bleeding wound), the employee shall wash their hands and other affected skin for at least 30 seconds with soap and water after the direct contact has ended. This precaution is recommended to prevent exposure to other pathogens, not just HIV. As has been discussed, blood, semen, vaginal secretions, and blood-contaminated body fluids transmit HIV. Wiping a runny nose, saliva, or vomit does not pose a risk for HIV transmission.

- Handwashing

Proper handwashing requires the use of soap and warm water and vigorous washing under a stream of running water for at least 30 seconds. If hands remain visibly soiled, more washing is required. Scrubbing hands with soap will suspend easily removable soil and microorganisms, allowing them to be washed off. Running water is necessary to carry away dirt and debris. Rinse your hands under running water and dry them thoroughly with paper towels or a blow dryer. When hand-washing facilities are not available, use a waterless antiseptic cleanser, following the manufacturer's directions for use.

- Disinfectants

An EPA approved germicide or a solution of 99 parts water to 1 part household bleach (or ¼ cup bleach to one gallon of water) will inactivate HIV, and should be used to clean all body fluid spills. Higher concentrations of bleach can be corrosive, and are unnecessary. Surfaces should be cleaned thoroughly prior to disinfecting.

- Disinfecting Hard Surfaces and Caring for Equipment

Although hard surfaces have not been found to be a means of transmitting HIV, it is good hygiene policy to clean any soiled hard surfaces thoroughly. To do this, scrub the surface to remove any soil and apply a germicide (like the bleach/water solution described above) to the equipment used. Mops should be soaked in this solution after use and rinsed thoroughly with warm water. The solution should be promptly disposed of down a drainpipe. Remove gloves and discard them in appropriate receptacles, and wash hands as described above.

- Laundry Instructions for Clothing Soiled with Body Fluids

It is important to remember that laundry has never been implicated in the transmission of HIV. To ensure safety from transmission of other germs, contaminated clothes must be laundered with soap and water to eliminate potentially infectious agents. The addition of bleach will further reduce the number of potentially infectious agents. Clothing soaked with body fluids may be washed separately from other items. Pre-soaking may be required for heavily soiled clothing. Otherwise, wash and dry as usual, following the directions provided by the manufacturer of the laundry detergent. If the material can be bleached, add ½ cup of household bleach to the wash cycle. If the material is not colorfast, add ½ cup of non-chlorine bleach to the wash cycle.

It is good hygiene to treat all bodily fluids as infectious.

Hazardous Material Spill Response

Purpose:

To establish the policy and procedures regarding Management and employee response and actions to a hazardous material spill or leak.

Policy:

Federal, state, and local environmental laws dictate the specific handling and disposal methods of hazardous materials. Failure to comply with these laws can be very costly as well as environmentally negligent. UT/IJP will fully comply with all laws and regulations pertaining to the handling and disposal methods of hazardous materials. UT/IJP will train all employees in the proper procedures to follow and what to do when they encounter a hazardous spill or leak.

Overview:

There are four classifications of hazardous chemicals that employees will likely come into contact with. These are:

IGNITABLES---TOXICS---CAUSTICS---REACTIVES

IGNITABLES- Ignitable products are either flammable or combustible. A spill of this nature creates two problems: one involving the potential for explosion and/or fire, and the other is the pollution of the environment. Examples are gasoline, paint thinners, petroleum solvents, alcohol, and adhesives.

TOXICS- These products are poisonous to the body and can cause illness or death. Examples are anti-freeze, paint, insecticides, fertilizer, and cleaning fluids.

CAUSTICS- A caustic is anything that burns, strongly irritates, corrodes or simply destroys the skin. Examples are acids and drain cleaners.

REACTIVES- These products react violently when mixed with other products. The most common example is dry or liquid chlorine.

Procedure:

Regardless of the nature of the spill, and before starting any cleanup activities, the employee(s) shall always secure the area around the spill. This is to include asking all other unnecessary employees and customers to move a safe distance away from the spill site. The employee(s) shall also barricade or cordon off access to the site with tape or other visual barriers as needed to keep people from wandering into the spill site.

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Once the area is secure, Management shall be notified of the spill, it's location, and when the area is clean. Management shall also notify public officials as necessary.

Employee(s) that are required and directed to conduct the cleanup shall always check the warning label of an unbroken container or the Material Safety Data Sheet (MSDS) of the product involved in the spill or leak. Either the product label or the MSDS should have cleanup procedures (Section VII of the MSDS form). If not, or if time does not permit, the employee(s) shall consider the product extremely hazardous and use the following cleanup procedure:

1. Immediately shut off or eliminate all possible sources of ignition to include turning off anything that might produce a spark, flame, or friction.
2. A fire extinguisher must accompany all ignitable spill cleanups.
3. Cover the spill or leak with absorbent materials to reduce evaporation.
4. Ventilate the area as well as possible by opening doors and windows.
5. If a spill is large, a fan shall be set up at least ten feet from the person cleaning up the spill. The fan shall be behind the person cleaning up the spill to blow the hazardous vapors away from their breathing area.
6. Wear safety goggles, gloves, disposable overshoes, and respirator (as necessary) prior to cleaning up the substance.
7. Small spills (one pint or less) can be cleaned up with absorbent materials (rags, paper towels, etc.), and placed into a plastic bag. These bags will be labeled as a flammable or combustible. The label on the bag must also have the following information: (1) the name of the product in the bag, (2) the quantity of material in the bag, (3) name of manufacturer, (4) and the date of the spill. The words "Hazardous Waste" must be clearly marked on the bag.
8. After the spill area is thoroughly dry, the spill area shall be scrubbed with a mild detergent using a broom or mop.
9. The bags shall then be placed in properly labeled containers for disposal. UT/IJP can accumulate hazardous waste on site for up to 90 days without a permit. Disposal shall be in accordance to guidelines of local and state regulations.
10. All efforts shall be taken to prevent hazardous material from entering sewage systems. If infiltration occurs, the fire department shall be notified.

Employee(s) in contact with the hazardous material shall be informed to recognize physical symptoms of accidental exposure (found in MSDS Section VI). They shall be told that if they develop a ***skin rash, shortness of breath, asthma or any abnormal condition, they are to see a doctor immediately for an evaluation!***