H.E. ORR COMPANY

335 W. Wall Street Paulding, OH 45879 419-388-4866 Revised: 09-09-2020 Last Revision: 01-07-2022

SAFETY PROGRAM

Contents

INTRODUCTION	1
FORWARD	1
SAFETY POLICY	1
AIDS POLICY STATEMENT	2
ALCOHOL AND DRUG POLICY STATEMENT	2
SAFETY GOALS	2
SAFETY DIRECTOR	3
SUPERVISORS/ACTING SUPERVISORS' RESPONSIBILITIES	3
ASSOCIATE RESPONSIBILITIES	3
ACCIDENT INVESTIGATION	4
ACCIDENT RECORDS	4
EVACUATION PROCEDURES	5
SAFETY COMMITTEE	6
PLANT INSPECTION	6
ELECTRICAL	7
EYES	7
HEARING	7
FEET	8
GAS & OXYGEN USE AND STORAGE	8
FORK LIFT TRUCK OPERATION	9
HOIST SAFETY	10
LADDERS	10
PAINT ROOM SAFETY	11
RESPIRATOR SAFETY	11
STORAGE OF HAZARDOUS CHEMICALS	12
PRESSES	13
GUARDING	13
PERSONNEL & TRAINING	13
OPERATION	13
	13
LOCKOUT/TAGOUT PROGRAM	14
Appendix A	23
ENERGY CONTROL PROCEDURE	23
PERMIT REQUIRED CONFINED SPACES PROGRAM	25
Non-Permit Required Confined Spaces	28
Permit-Required Confined Space Entry	29 2
	_

Personnel Duties	31
Confined Spaces at Herbert E. Orr Company:	34
Training	35
Appendix B	36
Entry Permit	36
BLOODBORNE PATHOGENS POLICY	39
Purpose of the Plan	40
General Program Management	41
Availability of the Exposure Control Plan to Employees	42
Review and Update of the Plan	43
Exposure Determination	43
Methods of Compliance	44
Universal Precautions	44
Engineering Controls	45
Work Practice Controls	45
Personal Protective Equipment	46
Housekeeping	48
Vaccination Program	49
Post-Exposure Evaluation & Follow-up	51
Medical Recordkeeping	54
Labels & Signs	54
Information & Training	55
RESPIRATOR POLICY	57
HOT WORK POLICY	59
Procedures	59
Grinder Policy	61
HEARING CONSERVATION POLICY	63
POWERED INDUSTRIAL TRUCKS PROGRAM	65
Responsibilities	65
Training	66
Training Program Content	66
POWERED INDUSTRIAL TRUCKS TRAINING PROCEDURE	73
FIRST AID & ACCIDENT POLICY	77
FIRST AID	77
ACCIDENTS	81
BACK INJURY AVOIDANCE	81
SLIPS, TRIPS AND FALLS	82

ELECTRICAL WORK PRACTICES PROGRAM	83
Responsibilities	83
Definitions	83
Procedure	84
HAZARD COMMUNICATION PROGRAM	93
Responsibilities	93
Definitions	94
Program Application	95
Procedures	95
Training	97
SDS and Chemical Inventory	
CRANES & HOISTS SAFETY PROGRAM	
Responsibilities	
Definitions	101
Procedure	
Crane and Hoist Operation	
EMERGENCY SPILL CLEANUP POLICY	105
Procedure	
Emergency Contacts	
Required Equipment	
Disposal	
HOUSEKEEPING POLICY	
Responsibilities	
Safety Concerns	
Daily Duties	
FIRE PROTECTION POLICY	110
Small Fires	110
Large Fires	110
Evacuation	111
Fire Safety	111
FACILITY MAPS AND EMERGENCY CONTACTS	112

INTRODUCTION

It is the intent of Herbert Orr Company, of Paulding, Ohio:

- To furnish each of our associates with employment and a work place, which is free from recognized hazards that are likely to cause death or serious hazards to our associates.
- To comply with occupational safety and health standards promulgated under the Occupational Safety and Health Act of 1970.

Therefore, we have compiled this manual covering our Safety Program. The manual will be updated as the need arises.

In order to implement an effective Safety Program, each associate shall become familiar with the safety rules and procedures presented in this manual.

Most accidents occur due to carelessness and/or inattentiveness. As an Orr associate, it is your responsibility to exercise extreme caution in performing your job duties and utilize all prescribed safety devices and methods.

FORWARD

It is recognized that industrial accidents can be controlled by:

- Management exercising their authority to institute and maintain methods of procedure;
- Supervisors exercising their responsibility to implement and follow through on training on management's established policies on training and operation;
- Properly trained and supervised associates conducting their operations in accordance with established policies and procedures.
- Assistance from a qualified, experienced safety agency such as our insurance carrier.

SAFETY POLICY

The Company will, at all times, and at every level of management, attempt to provide and maintain a safe working environment for all their associates. In addition, all safety programs will be prevention oriented, in the hope that all preventable accidents, can and will be avoided.

The Company will also make every effort to stimulate associate participation in the safety program. Safety maintenance methods will be formulated on an on-going basis to prevent accidents and to eliminate any possible repetition of an accident.

AIDS POLICY STATEMENT

Orr's commitment to providing a workplace free of handicap discrimination includes AIDS-related discrimination. Associates or applicants who have tested positive for Human Immunodeficiency Virus (HIV) or Acquired Immune Deficiency Syndrome (AIDS) will be treated as any other applicant or associate with an illness or medical condition. Orr will comply with all statutory requirements regarding maintaining the confidentiality of associates' health conditions, obtaining consent to perform HIV testing, educating associates about dangerous communicable diseases, providing training in "universal precautions" and providing protective equipment designed to prevent transmission of dangerous communicable diseases through blood or other body fluids. Failing to use the "universal precautions" will subject an associate to discipline, up to and including dismissal.

ALCOHOL AND DRUG POLICY STATEMENT

Orr's commitment to providing a safe workplace includes alcohol and drugs. At no time will alcohol or illegal drugs be allowed on the company property or in its vehicles. Use of prescription drugs is allowed if they are in the original container and belong to the user.

Anyone who is using or selling illegal drugs, alcohol or prescription drugs not theirs will subject an associate to discipline, up to and including dismissal.

For more information, see Orr's Alcohol and Drug Policy.

SAFETY GOALS

The goals of Orr's safety program are:

- To provide and maintain an injury-free working environment.
- To solve safety problems through prevention.
- To promote safety consciousness of both management and associates.
- To involve both management and associates in safety planning.
- To reduce injury-related absenteeism.
- To use authority to decrease safety violations.

SAFETY DIRECTOR

The Safety Director coordinates the various functions of the Safety Program. The Safety Director is assigned these specific duties:

- Acts as Chairman of the Safety Committee;
- Sees that Injury Forms are properly prepared for every incident reported by an associate requiring medical treatment;
- Follows through on corrective action recommended as a result of each investigation;
- Reviews recommendations submitted as the result of plant safety inspections;
- Follows through on compliance with approved recommendations, keeping plant management advised as to progress and outstanding items;
- Maintains a monthly tabulation of accidents to be submitted to management and members of the Safety Committee;
- Arranges for the posting of safety posters throughout the plant and keep the bulleting boards in attractive condition;
- Maintains at all times, close communication with management on matters of safety requiring management action.

SUPERVISORS/ACTING SUPERVISORS' RESPONSIBILITIES

These responsibilities are:

- To train the new associate in the safe execution of his/her job;
- To retrain the existing associate who is apt to bypass safe practice because of his/her familiarity of the operation;
- To investigate promptly all accidents in his/her department, using the proper forms for personal injuries;
- Daily, while performing his/her normal duties, watch for unsafe practices as well as unsafe conditions.

ASSOCIATE RESPONSIBILITIES

Your safety and health are of 1st importance.

Be alert and make it your personal responsibility to be "safe-minded" and take personal pride in doing your part in our accident prevention program. It is essential to the health and well-being of all of us that we keep the plant as clean and orderly as possible. Your assistance and cooperation are appreciated.

ACCIDENT INVESTIGATION

All accidents must be investigated promptly and recorded by the supervisor on the Accident/Incident Report form. This information should include:

- The basic cause of the accident
- The action taken or recommended to prevent recurrence

Potentially serious accidents, causing little or no personal injury, should receive the same careful investigation as those causing serious injury. This includes "near-misses."

Copies of all investigation reports should be forwarded to the Safety Director.

The Safety Director will review the report immediately for completeness and accuracy and forward copies to the **<u>President</u>**.

ACCIDENT RECORDS

The Accident/Incident Report is to be filled out for each incident reported by an associate and their supervisor.

One copy is maintained by the Safety Director.

The Employer's First Report of Injury, or FROI, form will be completed, if required, for the Ohio Bureau of Workers Compensation by the Safety Director.

A copy of the FROI will be attached to the Accident/Incident Report and kept on file by the Safety Director.

(see examples on next 2 pages)

EVACUATION PROCEDURES

In the event that Herbert Orr Company needs to be evacuated, the following procedure will be followed:

An announcement will be made over the loud speaker system identifying the area(s) to be evacuated. Associates will exit in a quiet and orderly manner using the nearest available exit. If that exit is blocked, use the next available exit. All emergency exits are clearly marked with lighted Exit Signs to direct you to the nearest emergency exit.

After safely exiting the building, all associated will meet at the Designated Assembly area:

- North side of the property to the west of the employee parking area
- If the above location is unavailable, the West side of the property south of the Bakle Building will be used.

All associates are to remain outside of the building until an all clear announcement is made.

In the event that there is a severe weather emergency, the following procedure will be followed:

An announcement will be made over the loud speaker the nature of the emergency and to take shelter immediately. The Severe Weather shelters are:

- The hallway from the front break room to the office area;
- The Packaging Department restrooms

All associates are to remain in the Severe Weather shelters until an all clear announcement is made.

For more information, see the H.E. Orr Tornado Safety Policy and H.E. Orr Fire Protection Policy.

SAFETY COMMITTEE

The Safety Committee will consist of:

- Safety Director
- Seven associates (on a rotating basis)

The duties of the Safety Committee are to meet regularly each month to conduct the following duties:

- Review Accident/Injury Reports
- Review all plant inspection reports to discuss status of recommendations
- Discuss any new ideas or problems having to do with the prevention of accidents

Reports from each monthly meeting shall:

- Be written and posted for all associates to review;
- Have a copy of the meeting notes forwarded to all members of management;
- Have approved recommendations submitted to the proper personnel for action;
- Assign the Safety Director to follow up on all recommendations and report the results to the committee at the next meeting.

PLANT INSPECTION

The purpose of plant inspections is to detect and correct unsafe conditions, unsafe practices and any conditions not in compliance with laws or regulations.

Every department should be inspected at least once a month by the Safety Director.

Written reports on the findings of the inspection will be submitted to the President and the Maintenance Supervisor, who will take the necessary steps to get prompt compliance with all approved recommendations.

ELECTRICAL

- Whenever a buss box is open, it must be tagged with a red "DANGER" tag and then cleared before being closed.
- Flexible cords may not be spliced.
- Flexible cords may not be looped over any metal surface.
- No installation shall be made using other than approved materials, e.g. conduit, conduit fittings, groundings, secure fastenings.
- All maintenance persons must apply their "lock tag" and padlock to any switch box when working on an electrical system. If more than one is working on the system, each maintenance person's lock must be on the switch gear.
- For more information, see Herbert E. Orr Company Lock-Out/Tag-Out Policy and Herbert E. Orr Company Electrical Safety-Related Work Practices.

EYES

- All associates are required to wear safety glasses, supplied according to our industrial eyewear program.
 - For those wearing prescription glasses, Herbert E. Orr Company will pay for one pair of safety glasses every 12 months. Associates must pay for their own eye examination.
- Side shields shall be on all eyewear.
- Arc welding or acetylene welding requires the use of approved goggles or shields.

HEARING

- Herbert E. Orr Company keeps hearing protection on hand for all associates as well as company visitors.
- All visitors must wear hearing protection at all times while in the plant except when in the restrooms, locker rooms, break areas, or office areas.
- All supervisors will be trained in the proper use and care of hearing protection. They, in turn, will ensure that all associates are wearing them.
- Failure to use hearing protection where required will subject an associate to discipline, up to and including dismissal.

FEET

- All associates are required to wear safety shoes.
- All temporary personnel are required to wear safety shoes.
- Safety shoes must have a leather upper and not have urethane soles.
- Maintenance personnel may not wear athletic style safety shoes.
- Shoes may be reordered through Payroll and paid by payroll deduction if ordered through an approved company.

GAS & OXYGEN USE AND STORAGE

- All cylinders when supplied with caps, shall have caps on when not in use.
- All empty cylinders shall have valves closed and packed in the empty storage area.
- All cylinders must have the valve closed before disconnecting from its installation.
- All gas and oxygen cylinder shall be legibly marked for the purpose of identifying the content.
- Cylinders shall be kept away from all sources of heat.
- Valve protection caps shall always be in place, hand-tight, except when in use or connected for use.
- Oxygen cylinders in storage shall be separated from fuel/gas cylinders or combustible materials a minimum of 20 feet.
- Cylinder valves must be closed before moving cylinders at any time.
- Cylinder valves must be closed when not in use, even though in position for work.
- No one shall tamper with safety devices on cylinders or valves.
- A hammer or wrench shall not be used to open cylinder valves.
- An acetylene cylinder valve shall not be opened more than 1 ½ turns of the spindle, and preferably no more than ¾ of a turn.
- Cylinders in storage shall be chained in a rack in an upright position.

FORK LIFT TRUCK OPERATION

- Only licensed and authorized operators are allowed to operate an y fork lift truck for any reason.
- No person is ever allowed to pass under the elevated portion—loaded or unloaded.
- When an operator leaves a fork truck unattended:
 - Forks must be lowered flat to the floor;
 - Controls in neutral;
 - Power shut off;
 - Brakes set;
 - o If parked on an incline, wheels must be chocked.
 - When loading or unloading a trailer, trailer brakes must be set & trailer wheels must be chocked.
- An overhead guard must be in use on all fork lift trucks.
- Spinner knobs are not allowed except on an electrical fork lift.
- Maintain a minimum of 3 truck lengths distance when following another vehicle.
- Drivers must slow down and blow the horn at cross aisles and other locations where vision is obstructed.
- Trucks shall be operated at a speed that will permit it to be brought to a stop in a safe manner.
- Stunt driving or horseplay shall result in revocation of fork lift driver's license as well as disciplinary action as per the bargaining contract.
- Only loads within the rated capacity of the fork lift truck shall be handled.
- All horns must be in operating condition at all times.
- Warning beacons must be in use whenever fork lift power is on.
- Operator must be off of the truck and engine not running whenever refueling.
- All back-up alarms are to be in working order at all times.
- No riders at any time.
- When removing or replacing material in any storage area, or dumping any material, **ALWAYS** make sure the **immediate area (15 feet in any direction)** is clear of **any** people.
 - If there are people within that area, signal them to move. If they refuse, immediately notify the supervisor of that area.
 - Do not attempt to move material while people are the "danger zone."
- Whenever moving any container, empty of full, only one container is to be moved at any time.
- See Fork Lift Training Policy for further safe operating procedures.

HOIST SAFETY

The company sees a hoist as a useful mechanical device which gives one the ability to lift and move heavy objects. It saves time and, if used properly, can save people from back injury. However, as with all mechanical devices, there is danger associated with lifting devices. You must know what you are doing and must be careful.

Because you don't know who use the hoist last (it may have been overloaded, for example), before each use, the hoist must be examined for bent or damaged components. Particular attention should be paid to frayed cables.

Listed below are some safety precautions to be taken:

- Never use chains, cables, or rope slings that are kinked or twisted.
- Loads must be properly rigged with hooks, chains or slings and they must never exceed the hoist's rated capacity.
- When unloading steel rods, care must be taken to ensure you are lifting at the center of gravity.
- Ensure that the area around the hoist is free not only from debris, but most importantly, people. Never, as a hoist operator, allow yourself or an associate to be under a hoisted load.
- Be careful that loose clothing and fingers are kept safe from hoist mechanisms. All guarding devices must be in place.
- A hoist is designed to move product, not people. Never let anyone ride on a hoist or hoisted object.
- The hoist and its lifting devices shall be checked and tested according to the Herbert E. Orr Company Hoist and Sling Policy for its associates' safety.
- If you, as an operator, feel a hoist is unsafe to use, shut it down and get your supervisor.
- For more information, see Herbert E. Orr Company Hoist and Sling Policy.

LADDERS

- All portable ladders must be equipped with safety feet.
- The top ½ of an extension ladder may not be used in combination with its mating part.
- Do not use any ladder that needs repairs of any kind. Tag any defective ladder with a "DANGER" tag and notify the Safety Director.
- Ladders in use must be at such a pitch that the horizontal distance from the top support to the base, will not be greater than ¼ the vertical distance between these two points.

PAINT ROOM SAFETY

Herbert E. Orr Company recognizes that associates who work in the Paint Room do more than just load and unload the paint racks. Herbert E. Orr cannot to begin to emphasize the use of safe procedures for those associates.

Listed below are safety procedures that must be followed:

- 1. Keep work area free of clutter.
- 2. Take care when loading and unloading the paint racks that you don't drop the parts.
- 3. When unloading the parts, lay them in the container. DON'T drop them in as it scratches the paint.
- 4. When adding chemicals, paint, etc., check the SDS for the required safety equipment.
- 5. When cleaning the pre-wash tank, post-rinse tanks, and paint tank, check the **Confined Space Policy** before starting this task.
- 6. All supervisors will be trained in what safety equipment to use and will assist their associates in verifying what equipment to use.
- NOTE: Never do items 4 & 5 without proper safety equipment. Failure to follow this policy will subject an associate to discipline, up to and including dismissal.

RESPIRATOR SAFETY

Herbert E. Orr Company keeps respirators on hand to be used at times on specific jobs in the plant.

All supervisors will be trained where the use of the respirator is required. The supervisors will turn in a list to the **Safety Director** on which of their associates that required training in the use of the respirator and where it is to be used. Those associates will then be trained in the proper use of a respirator and where it is required.

All associates are expected to wear a respirator when it is required.

For more information, see the Herbert E. Orr Company **Respirator Policy**. Failure to follow the Respirator Policy will subject an associate to discipline, up to and including dismissal.

STORAGE OF HAZARDOUS CHEMICALS

Effective immediately all containers must be placed with the labels completely visible and readable. Whenever any container is placed into a storage area, it is your responsibility to make sure that the label is exposed and legible. If a label is not legible, notify the **Safety Director** of the container location and contents, and he/she will see that a label is placed on the container.

When a container is emptied, place a large "X" with a marker across the label. This will denote that the container is empty, but will have appropriate information available in regards to any residue still in the container.

All buckets, scoops, jugs, etc., that are used for dispensing must be legibly labeled with the product name that will be placed in it. If the labeling becomes illegible, it must be replaced.

For more information, see Herbert E. Orr Company written Hazard Communication Policy.

PRESSES

A workable program of press safety requires backing of all levels of management. Program objectives must be clearly spelled out and each associate's responsibilities must be clearly defined. Make certain each associate knows, unmistakably, what is expected of him/her and never bypasses or eliminates any safety device or procedure. The effectiveness of the program must be continuing success. The following listed steps are intended as a guide for our operations:

GUARDING

It is the company's responsibility to make certain that point of operation guards and other safety devices are provided for a safe operation. These guards and devices should make it impossible for press operators to place their hands or any part of their bodies under the ream and should be installed and tested before releasing the machine for production.

PERSONNEL & TRAINING

Supervisors, press operators, maintenance persons and die setters should be properly trained and through understand the operation of the press prior to operation.

NOTE: See press manuals for more detail on safety cautions where they apply.

OPERATION

- Safety guards and devices should be checked periodically during production runs to evaluate their effectiveness. Any unsafe practices or conditions should be corrected immediately.
- 2. Personal protective equipment such as safety glasses, safety helmets, tongs, gloves, hand pads and protective sleeves should be provided to suit the operation.
- 3. The work area should be kept clean and uncluttered.
- 4. If a press malfunction is reported, stop the press immediately and correct the problem before resuming production.
- 5. Never overload the press capacity.

MAINTENANCE

A preventive maintenance program with check lists for each press is to be followed. An historical record of all press maintenance work, repairs, and adjustments is to be up-to-date.

Herbert E. Orr Company

LOCKOUT/TAGOUT PROGRAM

Reference Standard

Occupational Safety and Health Administration: The Control of Hazardous Energy (Lockout/Tagout) Subpart J, 29 CFR 1910.147

Purpose

This procedure establishes minimum standards for Lockout/Tagout in our facility. The goal is the prevention of accidents caused by the accidental energization of equipment or release of stored energy.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company. This procedure covers the servicing and maintenance of machines and equipment in which the energization or startup of the machines or equipment, or release of stored energy, could harm employees. This standard establishes minimum performance requirements for the control of such hazardous energy.

Responsibilities

- Management is responsible for developing and periodically reviewing this program;
- Management is also responsible for appropriate employee training;
- Management and supervisors are responsible for enforcement of this program;
- Employees shall comply with all procedures outlined in this policy; and
- Contractors and vendors shall comply with all procedures outlined in this policy.

Definitions

Affected Employee: An employee whose job requires him or her to:

- operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout; or
- work in an area in which such servicing or maintenance is being performed.

Authorized Employee: A person who locks out or tags out machines or equipment in order to perform servicing or maintenance. An affected employee becomes an authorized employee when his or her duties include servicing or performing maintenance covered under this section.

Contractor: A non-company employee being paid to perform work in our facility.

Energy Sources: Mechanical, electrical, hydraulic, pneumatic, chemical, thermal, stored or other energy source.

Lockout: Placing a device on an energy isolating device, in accordance with an established procedure, ensuring that the energy isolating device and the equipment being controlled cannot be operated until the lockout device is removed.

Stored Energy Source: A hidden energy source that is capable of releasing energy suddenly. These energy sources can cause injury or death. Examples include: springs, capacitors, heavy objects held against gravity, and hydraulic or pneumatic cylinders.

Tagout: Placing a device on an energy isolating device, in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Tagout Device: A prominent warning device, such as a tag and a means of attachment, which can be securely fastened to an energy isolating device in accordance with an established procedure, to indicate that the energy isolating device and the equipment being controlled may not be operated until the tagout device is removed.

Program Application

Our facility will always use Locks to achieve control of hazardous energy rather than tags except when an energy control device is not capable of being locked out.

Energy Control Procedures

Our facility will maintain written energy control procedures for all equipment, unless the following elements exist:

- The machine or equipment has no potential for stored or residual energy or reaccumulating of stored energy after shut down which could endanger employees;
- The machine or equipment has a single energy source which can be readily identified and isolated;
- The isolation and locking out of that energy source will completely deenergize and deactivate the machine or equipment;
- The machine or equipment is isolated from that energy source and locked out during servicing or maintenance;
- A single lockout device will achieve a locked-out condition;
- The lockout device is under the exclusive control of the authorized employee performing the servicing or maintenance;
- The servicing or maintenance does not create hazards for other employees; and
- The employer, in utilizing this exception, has had no accidents involving the unexpected activation or re-energization of the machine or equipment during servicing or maintenance.

Written energy control procedures are available from the program administrator. These procedures are always available to authorized employees. (See Appendix A for the Machine Specific Energy Control Procedure)

Energy Control Hardware

• Locks - Each authorized employee will be assigned a sufficient number of locks to lock out the maximum number of energy control devices found on any equipment that he or she services or maintains. All locks used within our facility will have similar design and appearance. Each set of locks assigned to an authorized employee may be keyed alike, but only one key will be assigned for each lock;

- **Tags** Each authorized employee will be assigned a tag for each lock. Additional tags can be obtained from the program administrator. Tags will always be used in conjunction with locks. All tags used in our facility will be the same; and
- **Other Equipment** Hasps, valve and plug covers, chains, cables and other equipment to facilitate lockout is available in the maintenance department.

Preparation for Lockout

Prior to lockout, the authorized employee performing the task will do the following:

- Review the Energy Control Procedure for the piece of equipment s/he will be working on. Be sure that all energy sources have been identified;
- Procure all hardware needed to lockout all energy control devices;
- Complete information on tags; and
- Notify the "owner" of the equipment to be locked out (e.g. departmental supervisor, lead person, operator, etc.).

Lockout Sequence

- Shut down all energy sources using normal stopping/shut down devices (stop buttons, switches, valves, etc.);
- Isolate energy sources by applying a lock and tag to each control device. *Note: devices not capable of being locked will have a tag applied to the device or as close as possible to it;*
- Stored energy must be dissipated or restrained;
- Verify the energy isolation of the equipment by attempting to operate the machine using the normal operating controls *Note: check to be sure that it would be safe if restart actually happened*. Return the operating controls to off or safe; and
- Barricade the work area as necessary and perform the work.

Restoration of Energy

- Inspect the equipment to be sure that all tools and parts have been removed as necessary;
- Replace guards and restore machine controls;
- Notify the equipment "owner(s)" and other employees in the area;
- Remove locks and tags;
- Test operation of the equipment; and
- Release equipment back to the "owner(s)."

Multiple Employee Lockout

When more than one employee is assigned to work on the same piece of equipment, each employee will apply her/his lock and tag to each energy control device. In cases where an energy control device cannot accept multiple locks a hasp or lock box may be used. In the case of a lock box, each energy control device will be secured with one lock but the key will be locked in a box that is capable of accepting the lock of every employee assigned to perform the work. The key cannot be obtained until all assigned employees have removed their locks.

Shift Change or Employee Reassignment

Whenever a job extends from one shift to the next, a change-over period will be established where the two or more employee's may change locks. The off-going employee will remove their locks and the on-coming personnel will apply theirs.

Prior to doing any work, the on-coming employee(s) will verify that all energy sources are safe and locked out. If an authorized employee is not available at shift change, a supervisor may serve as the on-coming shift employee.

Stored Energy

Following the application of lockout or tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained, and otherwise rendered safe. If there is a possibility of re-accumulation of stored energy to a hazardous level, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.

Testing or Positioning of Machines

In situations in which lockout or tagout devices must be temporarily removed from the energy isolating device and the machine or equipment energized to test or position the machine, equipment or component thereof, the following sequence of actions shall be followed:

- Clear the machine or equipment of tools and material;
- Remove employees from the machine or equipment area;
- Remove the lockout or tagout devices;
- Energize and proceed with testing or positioning; and
- De-energize all systems and reapply energy control measures.

Emergency Lock Removal

Whenever Management determines that a lock must be removed the lock owner must be notified. If the lock owner is not in the plant, the following steps must be taken:

- Call the lock owner at home. If an answering machine is in use, leave an appropriate message;
- The supervisor, or another member of Management, will meet the employee at the entrance during the next scheduled shift and advise of the lock removal; and
- The cut off lock will be placed on the owners work bench or tool box along with a note that explains where the lock(s) was removed.

Contractors

Contractors will be required to submit a copy of their Company's Lockout plan to our program administrator. Our facility will also submit a copy of our Lockout program to the contractor. Both the contractor and our program administrator will make their respective employees aware of significant differences in the programs.

We reserve the right to require that contractors use our facility lockout procedures if they are more protective than the contractor's program.

Training

Authorized Employees

Authorized employees will be trained, at the time of hire or at reassignment into an authorized employee position, in the following:

- Recognition of hazardous energy sources;
- Type and magnitude of energy in the facility; and
- Methods and hardware available for energy isolation and control.

Affected Employees

Affected employees and employees who may work in areas where equipment is locked out will be trained to recognize lockout locks and tags at the time of hire or assignment requiring this training. Training will include the purpose and use of the energy control procedure.

Affected employees will also be instructed that under no circumstances is anyone to remove a lock and/or a tag other than the person who applied it.

Authorized and Affected Employees

Retraining will be provided as follows:

- When the periodic inspection reveals a need for retraining;
- When a new hazard is identified;
- When the procedure changes; or
- When the program administrator determines that there is a need for additional training.

Other Employees

All other employees shall be trained on whose work operations are or may be in an area where energy control procedures may be utilized, shall be instructed about the procedure, and about the prohibition relating to attempts to restart or reenergize machines or equipment which are locked out or tagged out.

When tagout systems are used, employees will also be trained in the following limitations of tags:

- Tags are essentially warning devices affixed to energy isolating devices, and do not provide the physical restraint on those devices that is provided by a lock;
- When a tag is attached to an energy isolating means, it is not to be removed without authorization of the authorized person responsible for it, and it is never to be bypassed, ignored, or otherwise defeated;
- Tags must be legible and understandable by all authorized employees, affected employees, and all other employees whose work operations are or may be in the area, in order to be effective;
- Tags and their means of attachment must be made of materials which will withstand the environmental conditions encountered in the workplace;
- Tags may evoke a false sense of security, and their meaning needs to be understood as part of the overall energy control program; and
- Tags must be securely attached to energy isolating devices so that they cannot be inadvertently or accidentally detached during use.

Periodic Inspection

Annually, the program administrator will assign an appropriate authorized employee, other than the one utilizing the procedure under review, to review the following:

- All Energy Control Procedures for accuracy and need for updating;
- Each authorized employee and her/his responsibilities and understanding of the Lockout program (this may be accomplished through group meetings); and
- If any tagout only is utilized in our facility the inspector will also review the employee. responsibilities with all affected employees

The periodic inspection will certify the following:

- The identity of the equipment being utilized;
- Whenever there is a change in their job assignments;
- The inspection date; and
- Employees included in the inspection.

Appendix A ENERGY CONTROL PROCEDURE

	- Hereit and a state of the	and the second second	
Hazardous	Energy	Control	Procedures
A TREAT PLATER	and KY	Contar tor	T LUCCERRY CO

Name of Employee		Clo	ck No.:	
Machine/Equipmer	at on which task is being	performed:		
Hazard to which th	e employee is exposed v	vhen performing th	his task:	
	1) Caught in			
	Crushed by			
	Struck by			
	4) Thrown from			
	5) Contact with			
	6) Other			
Energy source which	ch exposed the employe	e to a hazard:		
	an standar in daar in 1996.	2) Flywhee		
1) Electrical				
3) Thermal		4) Engine	2	
3) Thermal		 Engine Spring 		
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic		4) Engine 6) Spring 8) Counter	Weight	
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical		4) Engine 6) Spring 8) Counter 10) Other	Weight	
		4) Engine 6) Spring 8) Counter 10) Other	Weight	
	nerey source:	4) Engine 6) Spring 8) Counter 10) Other	Weight	
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the c Volts	nergy source: Phase	4) Engine 6) Spring 8) Counter 10) Other Psi	Weight	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the e	nergy source: Phase	4) Engine 6) Spring 8) Counter 10) Other	Weight	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the end Volts	nergy source: Phase	4) Engine 6) Spring 8) Counter 10) Other Psi	Weight	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the c Volts Potential injury ass	nergy source: Phase	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener	Weight Degree F	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the e Volts Potential injury ass 1) Crush	nergy source: Phase	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat	Weight Degree F rgy: ed	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the en Volts Potential injury ass 1) Crush 3) Punctured	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures	Weight Degree F rgy: ed	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the energy	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns	Weight	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the c Volts Potential injury ass 1) Crush 3) Punctured 5) Lacerated 7) Air Pressure	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S	Weight Degree F rgy: ed d Shock	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the en Volts Potential injury ass 1) Crush 3) Punctured 5) Lacerated 7) Air Pressure 9) Death	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other	Weight Degree F rgy: ed d Shock	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical Magnitude of the c Volts Potential injury ass 1) Crush 3) Punctured 5) Lacerated 7) Air Pressure 9) Death	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other	Weight Degree F rgy: ed d Shock	Tons
	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other lvc) :	Weight Degree F rgy: ed d Shock	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the en Volts 1) Crush 1) Crush 3) Punctured 5) Lacerated 7) Air Pressure 9) Death Type of lock mecha	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other lve) :	Weight Degree F rgy: ed d Shock	Tons
1) Electrical 3) Thermal 5) Hydraulic 7) Pneumatic 9) Chemical 9) Chemical Magnitude of the e Volts Potential injury ass 1) Crush 3) Punctured 5) Lacerated 7) Air Pressure 9) Death Type of lock mecha	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other live) :	Weight Degree F rgy: ed d Shock	Tons
	nergy source: Phase ociated with the improp	4) Engine 6) Spring 8) Counter 10) Other Psi er isolation of ener 2) Amputat 4) Fractures 6) Burns 8) Electric S 10) Other live) :	Weight Degree F rgy: ed d Shock	Tons

Herbert E. Orr Company

PERMIT REQUIRED CONFINED SPACES PROGRAM

Reference Standard

Occupational Safety and Health Administration; Permit Required Confined Spaces, Subpart J, 29 CFR 1910.146

Purpose

This procedure establishes minimum procedures to be used for classifying confined spaces and for safe entry into those spaces.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

Responsibilities

- Management is responsible for the development and review of this program. Management is also responsible for appropriate employee training;
- Management and supervisors are responsible for the enforcement of this program;
- Employees must comply with all procedures outlined in this policy; and
- Contractors and vendors must comply with all procedures outlined in this policy.

Definitions

Acceptable Entry Conditions: Conditions that must exist in a permit space to allow entry and to ensure that employees involved with a permit required confined space entry can safely enter and work within the space.

Attendant: An individual stationed outside one or more permit spaces who monitors the authorized entrant(s) and who performs all attendant duties assigned in our program.

Authorized Entrant: An employee who is authorized to enter a permit space.

Blanking or blinding: The absolute closure of a pipe, line, or duct by the fastening of a solid plate (such as a spectacle blind or a skillet blind) that completely covers the bore and that is capable of withstanding the maximum pressure of the pipe, line or duct with no leakage beyond the plate.

Confined Space: A space that:

- Is large enough and is configured in a way that allows an employee to enter and perform assigned work;
- Has limited or restricted means of entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults and pits); and
- Is not designed for human occupancy.

Contractor: A non-company employee being paid to perform work in our facility.

Entry Permit: The written or printed document that is provided to allow and control entry into a permit space and that contains information specified in this written program.

Entry Supervisor: The person (such as the employer, foreman, or crew chief) responsible for determining whether acceptable entry conditions are present at a permit space where entry is planned. The supervisor authorizes entry, oversees entry operations, and terminates entry as required. Entry supervisors can also serve as entrants or attendants.

Hazardous Atmosphere: An atmosphere that may expose employees to the risk of death, incapacitation, impairment of abilities to self-rescue (escape unaided from a permit space), injury or acute illness from one or more of the following:

- Flammable gas, vapor or mist in excess of 10 percent of the Lower Flammable Level (LFL);
- Airborne combustible dust at a concentration that meets or exceeds its LFL (can be approximated where the dust obscures vision at a distance of 5 feet or less);

- Atmospheric oxygen concentration below 19.5 percent or above 23.5 percent;
- Atmospheric concentration of any substance for which a dose or a permissible exposure limit is published in 29 CFR 1910 Subpart G, Occupational Health and Environmental Control or in Subpart Z, Toxic and Hazardous Substances; or
- Any other atmospheric condition that is Immediately Dangerous to Life or Health (IDLH).

Non-Permit Confined Space: A space that does not contain or have the potential to contain any hazard capable of causing death or serious physical harm.

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

- Contains or has the potential to contain a hazardous atmosphere;
- Contains a material that has the potential for engulfing an entrant;
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross section; or
- Contains any other recognized serious safety or health hazard.

Retrieval System: Equipment (including a retrieval line, chest or full-body harness, wristlets, if appropriate, and a lifting device or anchor) used for non-entry rescue of persons from a confined space.

Vendor: A non-company employee being paid to perform a service in our facility.

Procedures:

Space Evaluation

All permit required confined spaces in our facility are identified (see Appendix A). We will continue to evaluate all new equipment and process changes to ensure that no additional permit-required spaces are created.

Space Marking

All permit required confined spaces will be conspicuously marked with a warning sign at each potential entry point. A sign reading "DANGER--PERMIT–REQUIRED CONFINED SPACE, DO NOT ENTER" or using other similar language.

Written Program

We will maintain and update this written program. It is available to all employees and their representatives for review.

Non-Permit Required Confined Spaces

Entry into non-permit required confined spaces is not regulated by this procedure. Employees are always required to evaluate the potential hazards of all jobs prior to beginning work. If any questions or concerns arise during the evaluation, the employee should discuss the issue with his or her supervisor or the program administrator.

Alternate Procedures

Permit required confined spaces can be reclassified as non-permit required spaces as described below:

If the permit space poses no actual or potential atmospheric hazards and if all hazards within the space are eliminated without entry into the space, the permit space may be reclassified as a non-permit space for as long as the non-atmospheric hazards are eliminated.

The program administrator, using properly calibrated direct-reading instrumentation, will test for oxygen content, flammable gases and vapors, and potential toxic air contaminants. Readings will be taken in the order listed in this paragraph. Acceptable readings include:

- Oxygen Content: Between 19.5 and 23.5 percent;
- Flammable Gases/Vapors: Below 10 percent of the lower flammable limit; and
- Toxic Air Contaminant: "Any air conditions defined as a hazardous atmosphere" by this policy.

Testing shall be done from the exterior of the entrance to the space. At no time will any portion of an employee's body break the plane of the entrance to the space to conduct atmospheric testing. If entry into the space is required to conduct testing or eliminate hazards, entry shall be done in accordance with the permit space entry procedures outlined in this policy.

If, after testing is complete, it is determined there are no atmospheric hazards or any other hazards that could potentially cause injury or harm, the space can be reclassified as a non-permit space and eliminated from the permit-space entry procedures. The atmosphere will be monitored continuously during the entry. This reclassification may remain in force as long as atmospheric hazards are not present.

Permit-Required Confined Space Entry

Preparation of the Space

An entry supervisor will be assigned to complete the permit (see Appendix B);

The following steps will be completed and checked off as applicable on the permit:

- All connecting lines, ducts and pipes connected to chemical, gas and utility sources will be broken and capped or blanked;
- Heating devices (e.g. jackets, coils, mantels, etc.) will be rendered safe either through line breaking/blanking or electrical lockout/tagout;
- All mechanical, hydraulic and electrical hazards (e.g. agitators, machine drives, electrical lines, etc.) will be controlled through lockout/tagout;
- The space will be rinsed and/or dried if there is a build-up of hazardous or slippery material on the walls of the space;
- The space will be cooled down to 110 °F or lower;
- Safe access to the space will be provided;
- Any open entrances will be appropriately blocked to prevent accidental entry;
- Adequate lighting will be provided either through low voltage lighting or through 110 Volt plugged into a Ground Fault Circuit Interrupter (GFCI);
- The space will be metered, in the order listed, to determine the following:
- Oxygen content: between 19.5 and 23.5 percent;
- Lower Explosive Limit: up to 10 percent
- All chemical exposures less than the OSHA PEL and/or other exposure guidelines used by our facility; and

• For vertical entries, the retrieval system will be setup at the entry point.

Permit Completion

- The permit will be completed by the entry supervisor (See Appendix B);
- All information requested on the permit will completed by the entry supervisor or "NA" (not applicable) will be written in;
- The time of permit issuance will always be written in. In no case will a permit remain valid for more than eight hours. If the job runs past eight hours, a new permit will be issued; and
- Expired permits will be returned to the program administrator.

Personnel Preparation

- Assign entrants and attendants. All personnel involved with the entry and their representative can observe all aspects of the preparation;
- Rescue Service will be notified when an entry will be taking place;
- Proper personal protective equipment will be selected and obtained for the entrant. Rescue service will also have access to an adequate supply of required PPE for a rescue team and a standby team;
- Select communication methods based on the size, location and characteristics of the space;
- Entry supervisors will brief entrants and attendants on all aspects of the job; and
- Entry supervisors, entrants and attendants can cancel the permit and cause the entry to be either postponed or stopped due to a safety concern.

Entry

- All required equipment for entry, including: communication, lighting, access, safety and rescue as well as the tools needed to accomplish the job will be available at the entrance;
- Continuous space atmosphere monitoring will be established either by the attendant or the entrant;
- The attendant will stay in the immediate area of the entrance to the space and will stay in contact with the entrant;
- The entry supervisor will formally approve the entry to begin. At any time during the job the entry supervisor, entrant or the attendant can cancel the permit and cause the entry to be either postponed or stopped due to safety concerns;
- The attendant will document meter readings at least at one-hour or more frequent intervals decided upon by the entry supervisor. When testing for atmospheric hazards:
 - test first for oxygen;
 - then for combustible gases and vapors; and
 - o finally for toxic gases and vapors; and
- The attendant will immediately communicate to the entrant any exterior condition that could affect the attendant's safety (e.g. fire alarm, severe weather, etc.).

Entry Completion

- The entry permit will be closed out by listing the time of space exit and any other pertinent information;
- Rescue Service will be notified when the entry is complete;
- The entry closure will be replaced;
- Blanked and capped piping, tubing and ducts etc. will be reattached;
- Disconnected hydraulic, mechanical and/or electrical equipment will be reattached;
- Lockout/tagouts will be released;
- Operating personnel for the space will be notified when they can return to production (if applicable);
- All safety and entry equipment will be cleaned and returned to storage locations; and
- Cancelled permits will be returned to the program administrator.

Personnel Duties

Entry Supervisors

All entry supervisors will:

- Know and understand the hazards that exist during entry (including the signs, symptoms and consequences of exposure);
- Before endorsing the permit and allowing entry to begin, verify that:
 - The appropriate notations have been made on the permit;
 - $\circ~$ All tests specified by the permit have been conducted; and
 - All procedures and equipment specified by the permit are in place;
- Terminate the entry and cancel the permit when
 - o Entry operations covered by the permit have been completed; or
 - When an unacceptable condition within the space or outside the space is detected;
- Verify that rescue services are available and that the means of calling the rescue service is operable. The entry supervisor will ensure that the attendant knows how to call for rescue services if rescue is required;
- Remove unauthorized individuals who enter (or attempt to enter) the permit space during entry operations;
- Monitor the conditions present in the permit entry space and determine whether these conditions remain consistently acceptable with the terms required by the entry permit whenever responsibility for a permit space entry operation is transferred and at intervals dictated by the hazards and operations performed within the space.
Entrants

All entrants will know the following:

- Hazards that may be presents during entry (including the mode, signs, symptoms and consequences of exposure);
- Proper use of equipment as required above.
- Means and methods of communication, so the attendant can properly monitor the entrants' and provide warning for evacuation;
- How to alert the attendant whenever:
 - The entrant recognizes warning signs or symptoms of exposure to a dangerous situation; or
 - The entrant detects a condition that would warrant immediate evacuation; and
- How to exit from the permit space as quickly as possible whenever:
- An order to evacuate is given by the attendant or the entry supervisor;
- The entrant recognizes any warning sign or symptom of exposure to a dangerous situation;
 - \circ $\,$ The entrant detects a prohibited condition; or
 - An evacuation alarm is activated.

Attendants

All attendants will:

- Know the hazards that may be present during entry or while in the space (including the mode, signs, symptoms and consequences of exposure to suspected hazards);
- Be aware of the possible behavioral effects of hazard exposure on authorized entrants;
- Continuously maintain an accurate count of authorized entrants in the permit space and ensure that the means used to identify authorized entrants is precise at all times;
- Remain outside the permit space during entry operations until relieved by another authorized attendant(s). *Note: When the employer's permit entry program allows attendant entry for rescue, attendants may enter a permit space to attempt a rescue if they have been trained and equipped for rescue operations;*
- Communicate with authorized entrants as necessary to monitor entrant status and to alert entrants of the need to evacuate the space when conditions warrant an immediate evacuation;

- Monitor activities inside and outside the space to determine if it is safe for entrants to remain in the space; and
- Order authorized entrants to evacuate the permit space immediately if the attendant:
 - Detects a hazardous condition;
 - Notices a change in the behavior of any authorized entrant which would suggest an exposure to a hazard;
 - Identifies a situation outside the space that could endanger the authorized entrants;
 - Cannot effectively and safely perform all the duties required as outlined in this policy; or
 - Summons rescue and other emergency services when the attendant determines that authorized entrants may need assistance to escape from permit space hazards.
- Do the following when an unauthorized individual approaches or enters a permit space while entry is underway:
 - Warn the unauthorized person that he or she must stay away from the permit space;
 - Advise the unauthorized person to exit immediately if they have entered the permit space; and
 - Inform the authorized entrants and the entry supervisor, if the unauthorized person has entered the permit space;
- Perform non-entry rescue (rescue attempts that do not cause the attendant to break the plane of the entry to the space) when it is determined a rescue of entrants is required; and
- Perform no duties that might interfere with the attendant's primary duty to monitor and protect the authorized entrants.

Rescue Service

Our facility has made arrangements with: **Paulding Fire & EMS** to provide entry rescue services.

We will meet with the rescue service provider and review the following:

- Our list of Permit Required Confined Spaces;
- The hazards present in each permit-required confined space;
- Procedures for entry;
- Equipment available on site; and
- Our training program.

Contractors

Any contractor engaged in a permit-required confined space entry must, at a minimum, follow this procedure. Whenever a contractor is involved in a permit-required confined space entry, a written plan for the entry will be submitted to the program administrator, prior to the work being scheduled. The program administrator, or a designated employee who has been trained as an entry supervisor, will approve written contractor plans.

Confined Spaces at Herbert E. Orr Company:

- Paint Room
 - All pre-wash and post-rinse tanks (PPE required eye protection, boots gloves)
 - Paint tank (PPE required eye protection, boots gloves)
 - Oven (PPE: eye protection, gloves, dust mask)
- Waste Water (PPE required eye protection, boots, gloves, bump hats, waterproof pants)
 - Pit (PPE: eye protection, gloves)
 - Clarifier (PPE: eye protection, gloves)
 - All holding tanks (PPE: eye protection, gloves)
 - Sludge tanks (PPE: eye protection, gloves)
- Production Area
 - Pangborne machine (PPE: eye protection, gloves)
- Outside
 - Paint storage tank (PPE: eye protection, gloves)
 - Zinc phosphate storage tank (PPE: eye protection, gloves)
- **NOTE: Any time you use a light in a confined space, you must use a Ground Fault Circuit Interrupter.

Training

Training will be provided for all attendants, entrants and entry supervisors:

- Before assigning duties relating to permit-required confined space entry;
- Before a change in assigned duties relating to permit-required confined space entry;
- Whenever there is a change in operations that presents a hazard for which workers have not been previously trained;
- Whenever there is an indication that the procedures described in this program and not being followed safely; and
- When there are indications that entry practices or knowledge do not meet safety requirements.

All training will be certified in writing with the employee's name, the trainer's signature or initials and the date of training. Participants will receive an outline of the material presented. The certification shall be available for inspection by employees and their authorized representatives.

Appendix B Entry Permit

Date and Time Is	sued:			Date and Time Expires:	
ob site/Space I.D.:				Job Supervisor:	
quipment to be worked	on:			Work to be performed:	
ttendant personnel:			-		
. Atmospheric Checks:	Time	. es		V /10 E 27 E 0()	
	Uxygei	1		70 (19.5 - 23.5 70)	
	Explosi	ve _		% L.F.L. (≤ 10 %)	
	Toxic			PM (less than PEL)	
T					
. rester's signature:					
. Space preparation (bla	nkina	Haz	ard	Preparation/Isolation	
lockout, etc.)	10000 9	1000			
	-				
. Ventilation:	N/A	Yes	No		
Mechanical	0	()	Ω		
Natural Ventilation only	y ()	()	()		
. Atmospheric check aft	er isolati	on an	d vent	on:	
Time:					
Oxygen:	(19.5 - 2	3.5 %)		
Explosive: L.F	.L (≤ 10	0%)			
Toxic:PPI	M AI	lowab	le PEL:		
Time	Te	esters	signat		
. Communication proceed	lures:				
Rescue team contact p	procedure	n			

9. Entrant, attend	lant, an	d supervisor:	Y Y	es	No					
Trained			()	()					
10. Equipment:					1	N/A	Yes	No		
Direct reading	g, calibra	ated meter			(()	()	()		
Ventilation eq	uipmen	t			()	()	()		
Safety harnes	ses and	lifelines for	entry perso	nnel	()	()	()		
Retrieval devi	ice				()	()	()		
Communicatio	ons				()	()	()		
Access equipr	ment				()	()	()		
Protective clo	thing		200 TON 100 March 10	aneco	5)	()	()		
All electric eq	uipment	listed for an	ea classifica	tion	()	()	()		
11. Periodic atmos	pheric t	ests:								
Oxygen _	%	Time	Oxygen	-	_%	Time				
Oxygen _	%	Time	Oxygen		%	Time_				
Explosive _	%	Time	Explosive	_	_%	Time_				
Explosivo	96	Time	Explosive		_%	Time _				
Lypiosive _										
Toxic	%	Time	Toxic		_%	Time				
Toxic	% % the wor	Time Time k authorized reedures hav	Toxic Toxic by this per been rece	mit a	_% _% and th and a	Time Time ne infor	mation erstood	contained he	ere-in. Writt ot be approv	ten ved if
Toxic	% the wor afety pro ked in th	Time Time k authorized cedures hav he "No" colur	Toxic Toxic by this per e been rece mn. This per	mit a ived	_% _% and th and a is not	Time Time ne infor are und valid u	mation erstood inless ai	contained he . Entry cann I appropriate	ere-in. Writt ot be approv e items are	ten ved if
Toxic	% the wor afety pro ked in th y: (Supe	Time Time k authorized cedures hav ne "No" colur ervisor)	Toxic Toxic by this per e been rece nn. This per	mit a ived mit	% % and th and a is not	Time _ Time _ ne infor are und valid u	mation erstood inless al	contained he Entry cann I appropriate	ere-in. Writt ot be approv e items are	en ved if
Toxic Toxic Toxic We have reviewed instructions and sa any items are mar completed. Permit prepared by All entry procedure	% the wor afety pro ked in th y: (Supe	Time Time k authorized cedures hav ne "No" colur ervisor) been followe	Toxic Toxic by this per e been rece mn. This per d:	mit a ived mit	_% _% and th and a is not	Time Time me informane und valid u	mation erstood inless al	contained he . Entry cann I appropriati	ere-in. Writt ot be approv e items are	en ved if
Toxic	% the wor afety pro ked in th γ: (Supe	Time Time k authorized cedures hav he "No" colur ervisor) been followe	Toxic Toxic I by this per e been rece mn. This per d:	mit a ived mit	_% _% and th and a is not	Time Time me infor	mation erstood inless al	contained he . Entry cann I appropriate	ere-in. Writt ot be approv e items are	ten ved if
Toxic	% the wor afety pro ked in th γ: (Supe	Time Time k authorized ocedures hav he "No" colur ervisor) been followe	Toxic Toxic I by this per e been rece mn. This per d:	mit a ived rmit	_% _% and th and a is not	Time Time me infor	mation erstood inless al	contained he Entry cann I appropriate	ere-in. Writt ot be approv e items are	en ved if
Toxic	% the wor afety pro ked in th γ: (Supe ≥s have	Time Time k authorized cedures hav ne "No" colur ervisor) been followe	Toxic Toxic I by this per e been rece nn. This per d:	mit a ived mit	_% _% and th and a is not	Time Time me infor	mation erstood inless al	contained he Entry cann I appropriate	ere-in. Writt ot be approv e items are	en ved if
Toxic	% the wor afety pro ked in th y: (Supe s have s have S have	Time Time k authorized ocedures hav he "No" colur ervisor) been followe been followe CAN BE (, THE ENT CERN.	Toxic Toxic I by this per e been rece mn. This per d: d: CANCELLI	mit a ived mit	_% _% and th and a is not	Time Time are infor are und valid u valid u	mation erstood inless al	contained he Entry cann l appropriate	ere-in. Writt ot be approv e items are items are TRY VENT OF	en ved if
Toxic	% % % % % % % % % % % % % % % % % % %	Time Time k authorized cedures hav ervisor) been followe been followe CAN BE (, THE ENT CERN. t the job site	Toxic Toxic by this per e been rece mn. This per d: d: CANCELLI CANCELLI	mit a ived mit ED A	_% _% and th and a is not is not is not	Time Time are infor are und valid u valid u valid t trent trent bermit t	mation erstood inless al IME B DANT	contained he Entry cann I appropriate Y THE EN IN THE E	ere-in. Writt ot be approv e items are items are TRY VENT OF inistrator at	en ved if the

BLOODBORNE PATHOGENS POLICY

Reference Standard

Occupational Safety and Health Administration; Bloodborne Pathogens Standard; 29 CFR 1910.1030

Purpose

This procedure establishes minimum procedures to be used for classifying confined spaces and for safe entry into those spaces.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

Responsibilities

- Management is responsible for the development and review of this program. Management is also responsible for appropriate employee training;
- Management and supervisors are responsible for the enforcement of this program;
- Employees must comply with all procedures outlined in this policy; and
- Contractors and vendors must comply with all procedures outlined in this policy.

Herbert E. Orr Company is committed to providing a safe and healthy workplace for its associates. The purpose of this program is to help associates identify bloodborne pathogen hazards and how to protect themselves by proper work practices and the use of personal protective equipment.

Purpose of the Plan

One of the major goals of the Occupational Safety and Health Administration (OSHA) is to regulate facilities where work is carried out—to promote safe work practices in an effort to minimize the incidence of illness and injury experience by associates. Relative to this goal, OSHA has enacted the Bloodborne Pathogens Standard, 29 CFR 1910.1030. The purpose of the standard is to reduce occupational exposure to Hepatitis B virus (BHV), Human Immunodeficiency Virus (HIV) and other bloodborne pathogens that associates may encounter in the workplace.

Herbert E. Orr Company believes that there are a number of good general practices that should be followed when working with bloodborne pathogens. These include:

- It is prudent to minimize all exposure to bloodborne pathogens.
- Risk of exposure to bloodborne pathogens should never be underestimated.
- Our facility should institute as many work practices and engineering controls as possible to eliminate or minimize associate exposure to bloodborne pathogens.

We have implemented this Exposure Control Plan to meet the letter and intent of the OSHA Bloodborne Pathogens standard. The objective of this plan is twofold:

- To protect our associates from health hazards associated with bloodborne pathogens.
- To provide appropriate treatment and counseling should an associate be exposed to bloodborne pathogens.

General Program Management

Responsible Persons

There are 4 major "Categories of Responsibility" that are central to the effective implementation of our Exposure Control Plan. They are:

- The Exposure Control Officer
- Department Managers and Supervisors
- Education/Training instructors
- Our associates

The following sections define the roles played by each of these groups in carrying out our plant.

Exposure Control Officer

The Exposure Control Officer will be responsible for overall management and support of our facility's Bloodborne Pathogens Compliance Program. Activities which are delegated to the Exposure Control Officer typically include, but are not limited to:

- Overall responsibility for implementing the Exposure Control Plan for the entire facility.
- Working with management and other associates to develop and administer any additional bloodborne pathogens-related policies and practices needed to support the effective implementation of this plan.
- Looking for ways to improve the Exposure Control Plan, as well as to revise and update the plan when necessary.
- Collecting and maintain a suitable reference library on the Bloodborne Pathogens Standard and bloodborne pathogens safety & health information.
- Knowing current legal requirements concerning bloodborne pathogens.
- Acting as facility liaison during OSHA inspections.
- Conducting periodic facility audits to maintain an up-to-date Exposure Control Plan.

The Safety Director has been appointed as the facility's Exposure Control Officer.

Department Managers & Supervisors

Department managers & supervisors are responsible for exposure control in their respective areas. They work directly with the Exposure Control Officer and our associates to ensure that proper exposure control procedures are followed.

Education/Training Coordinator

The Education/Training Coordinator will be responsible for providing information and training to all associates who have the potential for exposure to bloodborne pathogens. Activities falling under the direction of the Coordinator include:

- Maintaining an up-to-date list of facility personnel requiring training (in conjunction with facility management).
- Developing suitable education/training programs.
- Scheduling periodic training seminars for associates.
- Maintaining appropriate training documentation such as sign-in sheets and quizzes.
- Periodically reviewing the training programs with department Managers and Supervisors to include appropriate information.

The Safety Directory has been selected as the facility's Education/Training Coordinator.

Associates

As with all of our facility's activities, our associates have the most important role in our bloodborne pathogens compliance program, for the ultimate execution of much of our Exposure Control Plan rests in their hands. In this role they must do the following:

- Know what tasks they perform that have occupational exposure.
- Attend the bloodborne pathogens training sessions.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Availability of the Exposure Control Plan to Employees

To help them with their efforts, our facility's Exposure Control Plan is available to our associates at any time. Associates are advised of this availability during their education/training sessions. Copies of the Exposure Control Plan are kept in the Safety Director's office.

Review and Update of the Plan

We recognize that it is important to keep our Exposure Control Plan up-to-date. To ensure this, the plan will be reviewed and updated under the following circumstances:

- Annually
- Whenever new or modified tasks & procedures are implemented which affect occupational exposure of our associates.
- Whenever our associates' jobs are revised such that new instances of occupational exposure may occur.
- Whenever we establish new functional positions within our facility that may involve exposure to bloodborne pathogens.

Exposure Determination

One of the keys to implementing a successful Exposure Control Plan is to identify exposure situations that associates may encounter. To facilitate this in our facility, we have prepared the following lists:

- Job classifications in which <u>all</u> associates have occupational exposure to bloodborne pathogens (listed below)
 - Production Worker Production area
 - Paint Room Worker
 Paint Room
 - Packaging Packaging Department
 - Wireform worker Wireform Department
 - Office personnel
 Office area
 - Wastewater Treatment Wastewater area
 - Maintenance Tool Room & general Production area
 - Tool & Die
 Tool Room & general Production area
- Tasks and procedures in which occupational exposure to bloodborne pathogens occur (listed below)
 - Any task performed by above listed job classifications
 - Specifically, first aid responders

Methods of Compliance

We understand that there are a number of areas that must be addressed in order to effectively eliminate or minimize exposure to bloodborne pathogens in our facility. The first five areas we deal with in our plan are:

- 1. Use of universal precautions;
- 2. Establishing appropriate engineering controls;
- 3. Implementing appropriate work practice controls;
- 4. Using necessary personal protective equipment;
- 5. Implementing appropriate housekeeping procedures.

Each of these areas will be reviewed with our associates during their bloodborne pathogens-related training. By rigorously following the requirements of OSHA's Bloodborne Pathogens Standard in these five areas, we feel that we will eliminate or minimize our associate's' occupational exposure to bloodborne pathogens as much as is possible.

Universal Precautions

In our facility, Herbert E. Orr Company began the practice of "universal precautions" on November 10, 1992. As a result, we treat all human blood and bodily fluids such as semen and vaginal secretions as if they are known to be infectious for HBV, HIV, and other bloodborne pathogens.

In some circumstances, where it is difficult or impossible to differentiate between body fluid types, we assume all body fluids to be potentially infectious.

The Safety Director is responsible for overseeing our Universal Precautions Program.

Engineering Controls

One of the key aspects to our Exposure Control Plan is the use of Engineering Controls to eliminate or minimize associate exposure to bloodborne pathogens. As a result, associates use cleaning, maintenance and other equipment that is designed to prevent contact with blood or other potentially infectious materials.

The Herbert E. Orr Safety Director periodically works with department managers and supervisors to review tasks and procedures performed in our facility where engineering controls can be implemented or updated.

Each of these are re-examined during our Annual Exposure Control Plan review, and opportunities for new or improved engineering controls are identified. Any existing engineering control equipment is also reviewed for proper function and needed repair or replacement every 12 months, in conjunction with the department manager or supervisor where equipment is located.

In addition, handwashing facilities (or antiseptic hand cleansers and towels) will be made readily available to all associates who have the potential for exposure.

Work Practice Controls

In addition to engineering controls, our facility uses a number of Work Practice Controls to help eliminate or minimize associate exposure to bloodborne pathogens. Many of these Work Practice Controls have been in effect for quite some time.

The person in our facility who is responsible for overseeing the implementation of these Work Practice Controls is the Safety Director. He/she work in conjunction with department managers, supervisors, and any trainers to affect this implementation.

Our facility has adopted the following Work Practice Controls as part of our Bloodborne Pathogens Compliance Program:

- Associates wash their hands immediately, or as soon as feasible, after removal of potentially contaminated glovers or other personal protective equipment.
- Following any contact of body areas with blood or any other potentially infectious materials, associates wash their hands and any other exposed skin with soap and water as soon as possible. They also flush exposed mucous membranes with water. Universal precautions shall be observed to prevent contact with other person's blood or other potentially infectious materials.
- Equipment which become contaminated is examined prior to servicing or shipping, and decontaminated as necessary. Any appropriate biohazard label is

attached to contaminated equipment, and information regarding the contamination is communicated to all affected associates.

When a new associate comes to our facility, the following process takes place to ensure that they are trained in the appropriate work practice controls:

- The associate's job classification and the tasks and procedures that they will perform are checked against the job classifications and task lists which have been identified in our Exposure Control Plan as those in which occupational exposure may occur.
- The associate is then trained by the facility Training Coordinator or other instructor regarding any work practice controls that the associate is not familiar with.

Personal Protective Equipment

Personal protective equipment is our associates' "last line of defense" against bloodborne pathogens. Because of this, our facility provides the Personal Protective Equipment that they need to protect themselves against such exposure. This equipment includes, but is not limited to:

- Gloves
- Safety glasses
- Goggles
- Face shields
- Respirators

Hypoallergenic gloves, glove liners and similar alternatives are readily available to associates who are allergic to the gloves our facility normally uses.

The Safety Director, working with department managers and supervisors, is responsible for ensuring that all departments and work areas have appropriate personal protective equipment available to all associates.

Our associates are trained regarding the use of the appropriate personal protective equipment for their job classifications and tasks/procedures they perform. Initial training about personal protective equipment is completed during new associate orientation. Additional training is provided, when necessary, if an associate takes a new position or new job functions are added to their current position.

To ensure that personal protective equipment is not contaminated and is in the appropriate condition to protect our associates from potential exposure, our facility adheres to the following practices:

- All personal protective equipment is inspected periodically and repaired/replaced as needed.
- Re-usable personal protective equipment is cleaned, laundered and decontaminated as needed.
- Single-use personal protective equipment is disposed of by forwarding that equipment to the Safety Director.

To make sure that this equipment is used as effectively as possible, our associates adhere to the following practices when using their personal protective equipment:

- Any garments penetrated by blood or other infectious materials are removed immediately, or as soon as feasibly possible.
- All potentially contaminated personal protective equipment is removed prior to leaving a work area.
- Gloves are worn in the following circumstances:
 - Whenever employees anticipate hand contact with potentially infectious materials;
 - When handling or touching contaminated items or surfaces.
- Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an "exposure barrier."
- Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials.
- Protective clothing (such as coats) is worn whenever potential exposure to the body is anticipated.

Housekeeping

Maintaining our facility in a clean and sanitary condition is an important part of our Bloodborne Pathogens Compliance Program. To facilitate this, we have a regular schedule for cleaning and decontamination of the appropriate areas of the facility. The cleaning staff and company associates use a log book for communicating any special needs. The cleaning staff employ the following practices:

- All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious material; immediately when surfaces are overly contaminated or at the end of the shift if the surfaces may have been contaminated during that shift.
- Protective coverings (such as trash bags or wrap, aluminum foil or absorbent paper) are removed or replaced.
- All trash containers, pails, bins, and other receptacles intended for routine use are inspected, cleaned and decontaminated as soon as possible if visibly contaminated.
- Potentially contaminated broken glassware is picked up using mechanical means (such as dustpan and brush, tongs, forceps, etc.)

The Safety Director is responsible for setting up cleaning and decontamination arrangements and ensuring that it is carried out within our facility.

We are also very careful in our facility in handling regulated waste (including used bandages, feminine hygiene products, and other potentially infectious materials). The following procedures are used with all types of waste:

- They are discarded or "bagged" in containers that are closeable, punctureresistant and leak-proof.
- Containers for this regulated waste are placed in appropriate locations in our facility within easy access of our associates and as close as possible to the sources of waste.
- Waste containers are maintained upright, routinely replaced and not allowed to overfill.
- Whenever our associates move containers of regulated waste from one area to another, the containers are immediately closed and placed inside an appropriate secondary container if leakage is possible from the first container.

The cleaning staff for Herbert E. Orr Company is responsible for the collection and handling of our facility's contaminate waste.

Vaccination Program

Everyone in our facility recognizes that even with good adherence to all of our exposure prevention practices, exposure incidents may occur. As a result, we have implemented a Hepatitis B Vaccination Program, as well as set up procedures for post-exposure evaluation and follow-up should exposure to bloodborne pathogens occur.

To protect our associates as much as possible from Hepatitis B infection, our facility has implemented a vaccination program. This program is available at no cost to all associates who feel they need for this program due to occupational exposure.

The vaccination program consists of a series of three inoculations over a six-month period. As part of their bloodborne pathogens training, our associates receive information regarding Hepatitis B vaccination, including its safety & effectiveness.

Herbert E. Orr Company's Safety Director is responsible for setting up and operating our vaccination program. If an associate who is potentially exposed to bloodborne pathogens due to their duty or tasks refuses the vaccination, they must complete a **Vaccination Declination Form** (see next page). These are kept on file as well as any vaccination records of associates.

Vaccinations are performed under the supervision of a licensed physician or healthcare professional. All private, medical information of associates taking part in the vaccination program is kept confidential with all other private, medical information.

To ensure that all associates are aware of our vaccination program, it is thoroughly discussed in our bloodborne pathogens training.



HEPATITIS B VACCINE DELINATION FORM

I, ______, understand that due to my occupational exposure to blood or other potentially infectious materials that I may be at risk of acquiring hepatitis B virus (HBV) infection. I have been given the opportunity to be vaccinated with hepatitis B vaccine, at no charge to myself.

However, I decline the hepatitis B vaccination at this time. I understand that by declining this vaccination, I continue to be at risk of acquiring hepatitis B infection. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee signature

Date

Post-Exposure Evaluation & Follow-up

If one of our associates is involved in an incident where exposure to bloodborne pathogens may have occurred, there are two things that we immediately focus our efforts on:

- Investigating the circumstances surrounding the exposure incident;
- Making sure that our associates receive medical consultation and treatment (if required) as expeditiously as possible.

The Herbert E. Orr Safety Director investigates every exposure incident that occurs in our facility. This investigation is initiated within 24 hours after the incident occurs and involves gathering the following information:

- When the incident occurred (date and time).
- Where the incident occurred (exact location in facility).
- What potentially infectious materials were involved in the incident.
- Source of the potentially infectious material.
- Under what circumstances the incident occurred (type of work being performed).
- Root cause of how the incident occurred.
- Personal protective equipment being used at the time of the incident.
- Actions taken as a result of the incident.
 - Associate decontamination
 - o Clean-up
 - Notifications made

After this information is gathered, it is evaluated, a written summary of the incident and its causes is prepared and recommendations for avoiding similar incidents in the future (use **Exposure Incident Investigation Form**).

In order to make sure that our associates receive the best and most timely treatment if an exposure to bloodborne pathogens occurs, our facility has set up a comprehensive post-exposure evaluation and follow-up process. We use the **Post-Exposure Evaluation and Follow-Up Checklist** at the end of this section to verify that all of the steps in the process have been taken correctly. We recognize that much of this information must remain confidential, and we will do everything possible to protect the privacy of the associates involved. As the first step in this process, we provide the exposed associate(s) with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred;
- Identification of the source individual (unless infeasible or prohibited by law).

Next, if possible, we test the source individual's blood to determine HBV or HIV infectivity. This information will also be made available to the exposed associate, if it is obtained. At that time, the associate will be made aware of any applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.

Finally, we collect and test the blood of the exposed associate for HBV and HIV infectivity status.

Once these procedures have been completed, and appointment is arranged for the exposed associate with a qualified healthcare professional to discuss the associate's medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

To assist the healthcare professional, we forward a number of documents to them, including:

- A copy of the Bloodborne Pathogens Standard;
- A description of the exposure incident;
- The exposed associate's relevant medical records; and
- Other pertinent information.

After the consultation, the healthcare professional provides our facility with a written opinion evaluating the exposed associate's situation. We, in turn, furnish a copy of this opinion to the exposed associate.

In keeping with this process' emphasis on confidentiality, the written opinion will contain only the following information:

- Whether Hepatitis B vaccination is indicated for the associate;
- Whether the associate has received the Hepatitis B vaccination;
- Confirmation that the associate has been informed of the results of the evaluation;
- Confirmation that the associate has been told about any medical conditions resulting from the exposure incident which require further medical treatment.



POST-EXPOSURE EVALUATION AND FOLLOW-UP CHECKLIST

The following steps must be taken, and information transmitted, in the case of an employee's exposure to bloodborne pathogens.

ACTIVITY

- Associate furnished with documentation regarding exposure incident.
- Source individual identified.

Source Individual

Source individual's blood tested and results given to exposed employee.

)

- 4. Exposed associate's blood collected and tested.
- Appointment arranged for exposed associate with healthcare professional.

Professional's Name

- 6. Documentation forwarded to healthcare professional: Bloodborne Pathogens Standard
 - ____ Description of exposed associate's duties.
 - ____ Description of exposure incident, including routes of exposure.
 - ____ Result of source individual's blood testing
 - ____Associate's medical records

	COMPLETION DATE
	80-116-55-56-66-665-56-56
	80 110 ST 9014 AUX 10 ST
al:	
es	

Medical Recordkeeping

To make sure that we have as much medical information available to the participating healthcare professional as possible, our facility maintains comprehensive medical records of our associates. Herbert E. Orr HR Manager or Safety Director are responsible for maintaining these records, which include the following information:

- Name of the associate
- Social security number of the associate
- A copy of the associate's Hepatitis B vaccination status
 - Dates of any vaccinations
 - Medical records relative to the associate's ability to receive vaccination
- Copies of the results of examinations, medical testing and follow-up procedures which took place as a result of an associate's exposure to bloodborne pathogens
- A copy of the information provided to the consulting healthcare professional as a result of any exposure to bloodborne pathogens

As with all information in these areas, we recognize that it is important to keep the information in these medical records confidential. We will not disclose or report this information to anyone without our associate's written consent (except as required by law).

Labels & Signs

For our associates, one of the most obvious warnings of possible exposure to bloodborne pathogens are biohazard labels. Because of this, we have implemented a comprehensive biohazard warning label program in our facility using labels of the type seen below, or when appropriate, using red "color-coded" containers. The Safety Director is responsible for setting up and maintaining this program.



Items that should be labeled with biohazard labels are:

- Containers of regulated waste
- Laundry bags and containers
- Contaminated equipment

Information & Training

Having well-informed and educated associates is extremely important when attempting to eliminate or minimize our associates' exposure to bloodborne pathogens. Because of this, all associates who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program and furnished with as much information as possible.

Associates will be trained annually to keep their knowledge current. Additionally, all new associates, as well as associates changing jobs or functions, will be given additional training for their new position.

The Safety Director is responsible for ensuring that all associates who have potential exposure to bloodborne pathogens receive this training. The topics covered in this training include, but not limited to, the following:

- The Bloodborne Pathogens standard;
- The epidemiology and symptoms of bloodborne diseases;
- The modes of transmission of bloodborne pathogens;
- Our facility's Exposure Control Plan;
- Appropriate methods for recognizing tasks and other activities that may involve exposure to blood or other potentially infectious materials;
- A review of the use and limitations of methods that will prevent or reduce exposure, including:
 - Engineering controls
 - Work practice controls
 - Personal protective equipment
- Selection and use of personal protective equipment;
- Visual warnings of biohazards within our facility including labels, signs, and "color-coded" containers;
- Information on the Hepatitis B vaccine;
- Actions to take and persons to contact in an emergency involving blood or other potentially infectious materials;
- The procedures to follow if an exposure incident occurs, including incident reporting;
- Information on the post-exposure evaluation and follow-up, including medical consultation, that our facility will provide.

Our facility's training presentations make use of several techniques including classroom, videotapes/DVD's, online learning, and employee review sessions.

Because we feel that associates need an opportunity to ask questions, time is specifically allotted for these activities in each training session.

To facilitate the training of our associates, as well as to document the training process, we maintain training records containing the following information:

- Dates of all training sessions
- Content/summary of the training sessions
- Names of all instructors
- Names of all associates attending the training sessions

These training records are available for examination and copying for our associates, as well as OSHA and its representatives.

Herbert E. Orr Company

RESPIRATOR POLICY

Herbert E. Orr Company is committed to providing a safe and healthy work place for its associates. The purpose of this policy is to help our associates protect themselves by proper work practices and the use of personal protective equipment.

Respirators are not worn as a standard practice of the Herbert E. Orr Company, but in case of emergency, such as spills, adding chemicals in the Paint Room, waste chemical building, using degreaser in the Maintenance Department, or cleanup, they may be required. Herbert E. Orr Company will supply respirators to all associates who may be required to use one. The respirator will be selected on the basis of the hazard to which the associate is exposed.

- In areas where the use of a respirator may be required, the supervisor will be trained as to when a respirator may be required, its proper use and its limitations.
- All Herbert E. Orr Company associates requiring training must obtain a medical release signed by a physician.
- During training all associates will be fitted with a proper-sized respirator and pass a qualitative smoke test. They will also be trained in the proper cleaning, disinfecting, and storage of their respirator.
- Respirators will be stored in the lab.
- Training records will be kept by the Safety Director.
- Respirators shall be stored to protect against dust, sunlight, heat, extreme cold, excessive moisture, or damaging chemicals.
- Repairs on respirators will be made as needed.
- All respirators shall be inspected after each use by the associate using it and Herbert E. Orr Company shall inspect all respirators on a yearly basis to ensure it is in proper working condition. Respirator inspection will include a check of the tightness of connections and the condition of the facepiece, headbands, valves, connecting tube and canisters. Rubber or elastic parts will be inspected for pliability and signs of deterioration.
- All associates required to use a respirator will be retrained on a yearly basis and obtain a new physician's certificate.

- All new associates who are assigned to an area that requires a respirator will be immediately trained.
- Any associate developing a condition preventing him/her from using a respirator should immediately notify their supervisor of the condition and when they will again be allowed to use a respirator.
- The Safety Director has been designated to be responsible for this policy.

Herbert E. Orr Company

HOT WORK POLICY

Herbert E. Orr Company is committed to providing a safe and healthy work place for it associates. The intent of this policy is to provide our associates with procedures for cutting, grinding, and welding.

This policy will provide all maintenance associates with the following:

- Sufficient training to know and understand hot work procedures;
- Establish a Hot Work Permit System which includes fire safety issues;
- Establish an equipment system.

Procedures

Before cutting, welding, or grinding, the following should be done:

- Shift Supervisor
 - Inspect the area to be welded, cut or ground.
 - Issue Hot Work Permit after inspecting the area.
- Associates
 - Do not perform any welding, cutting, or grinding operations for which they have not been properly trained;
 - Inspect all equipment and work space for safety hazards before performing any task;
 - Store, maintain, and handle equipment according to instructions in this policy;
 - Cut, weld, or grind only after receiving a Hot Work Permit;
 - Do not perform assigned task unless conditions are safe;
 - Do not perform assigned task without required protective clothing;
 - Stop immediately if operations are deemed unsafe.

Before a Hot Work Permit is issued, the following criteria must be met:

- Equipment used is serviceable;
- Flammable or combustible materials are removed from the area (minimum of 35 feet). Should it not be possible to move the material, a fire-resistant shield must be used to shield the combustibles;
- Combustible walls within 35 feet will be shielded;
- A fully charged ABC fire extinguisher will be in the area;
- Floors in the work area will be cleaned;

- Determine that the work area is fire-safe;
- Inspect for adequate ventilation as determined by the task being performed.

Basic protective clothing requirements are:

- Gloves capable of preventing electric shock will be work at all times;
- Appropriate head, face, and eye protections will be worn at all times;
- Leather aprons and leggings must be worn if deemed necessary by associate performing the task;
- Never wear synthetic/polyester clothing during hot work;
- All loose clothing should be tucked in or buttoned (shirt sleeves and collars);
- Cover all open pockets;
- Clothing should be free of grease and oil.

Grinder Policy

The purpose of the policy is to help associates identify grinding hazards and how to protect themselves with proper work practices and the use of personal protective equipment.

Practices to be followed for safe operations are:

- Operators are to wear safety glasses;
- Operators are to wear gloves;
- Plastic shield is to be on grinder and turned down to prevent chips and grit from hitting operator;
- Tool rests are to be adjusted no more than 1/8" from the grinding wheel.
- Tongue guard to be adjusted no more than 1/4" from the grinding wheel.



- All grinding wheels are to be "ring tested" before mounting:
 - Support the wheel by the center hole and tap it gently around the side with a non-metallic instrument, such as a wooden hammer handle.
 - An undamaged wheel should give a clear, metallic tone. If cracked, there will be a dead sound, not a clear ring.
 - If checking an organic-bonded wheel, it does not have a clear ring.
- Dispose of old wheels in the proper container.
- All operators will receive training in practices of safe operation and ring test procedure.
- Supervisors will, throughout their shift, check to assure that safe operating procedures are being followed.

HOT WORK PERMIT

Request for Performing Hazardous Work

WORK TO BE DONE:

NAME OF DEPARTMENT:

PERSON IN CHARGE:

START TIME	DATE	EST. COMPLETION TIME/DATE

Special concerns/precautions-check as appropriate:

Stop work immediately if hazard warning by any person.
Remove or shield combustibles within 35 feet.
Fire extinguisher available and serviceable.
Guard against electrical shock.
Clean equipment, drums, etc. No flammables/explosives.
Welding/cutting/grinding equipment in good repair.
 Post warning signs/barricade area.
Other-explain:

The location of the hazardous work and surrounding area has been inspected by the undersigned. All necessary precautions have been taken. Permission requested to perform this work is hereby granted.

Signature of Supervisor

Work completed (date and time)

Herbert E. Orr Company

HEARING CONSERVATION POLICY

Reference Standard

Occupational Safety and Health Administration; Occupational Noise Exposure Standard; 29 CFR 1910.95

Purpose

This procedure establishes minimum procedures for complying with the Occupational Noise Exposure Standard and to effectively share pertinent data on the protection of our associates' hearing.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

Responsibilities

Herbert E. Orr Company is required to monitor associates' noise exposure to identify any exposure to noise at or above 85 decibels for a period of time of equal to or which exceeds 8-hour time-weighted average. Herbert E. Orr Company will notify all associates exposed to noise at or above 85 decibels.

Audiometric testing will be used to detect any changed in an associate's hearing during their employment with Herbert E. Orr Company. This testing will be at no cost to associates. Audiometric testing will be performed by licensed and certified audiologist, otolaryngologist, or other physician, or by a technician certified by the Council of Accreditation in Occupational Hearing Conservation.

A baseline audiogram will be obtained for comparison with future audiograms. Annually, all associates will be re-tested. This audiogram will be compared to the baseline audiogram to determine if it is valid and identify associates who may have developed a 10-dB change in their hearing. Any associate who develops a change in their hearing will be notified by Herbert E. Orr Company.

Hearing protection will be made available to all associates at no cost to associates. It is to be worn at all times except when in restrooms, locker rooms, break areas, or office areas. All associates will be shown how to use and care for their hearing protection. All associates will be supervised on the job to ensure that they wear them correctly.

All associates will be trained annually on the health effects of noise, the purpose, advantages and disadvantages of various types of hearing protection, fitting and care of hearing protection, and the purpose and procedures for audiometric testing.

Herbert E. Orr Company will keep noise exposure records for at least two (2) years. Associate audiometric test records will be maintained for the duration of their employment with Herbert E. Orr Company. This information is available to associates upon request at any time.

The Safety Director is responsible for compliance with the Occupational Noise Exposure Standard.

Failure to wear hearing protection in required areas will subject an associate to discipline, up to and including dismissal.

POWERED INDUSTRIAL TRUCKS PROGRAM

Reference Standard

Occupational Safety and Health Administration; Powered Industrial Trucks, Subpart N Standard; 29 CFR 1910.178

Purpose

This procedure establishes minimum standards for training powered industrial truck operators and selecting and maintain equipment.

Scope

This guide contains safety requirements relating to fire protection, design, maintenance and use of fork trucks, tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines. This section does not apply to compressed air or non-flammable compressed gas-operated industrial trucks, nor does it apply to farm vehicles, nor to vehicles intended primarily for earth moving or over-the-road hauling.

Responsibilities

- Management is responsible for the development and review of this program; Management is also responsible for appropriate employee training;
- Management and supervisors are responsible for enforcement of this program;
- Employees must comply with all procedures outlined in this policy; and
- Contractors and vendors must comply with all procedures outlined in this policy.

Training

- Only personnel authorized and currently trained will be allowed to operate a powered industrial truck. No one under 18 years of age is allowed to operate a powered industrial truck in this facility.
- Employees authorized and trained to operate powered industrial trucks will be certified. The Safety Director will keep current certification documentation.
- Training will consist of a combination of classroom and hands-on training.
- All hands-on training and practice for operator candidates will be properly supervised and conducted in a remote and safe area of the facility to prevent training accidents.

Training Program Content

The following topics and details should be incorporated into the powered industrial truck training program.

Truck-related topics:

- Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;
- Truck controls and instrumentation; where they are located, what they do, and how they work;
- Engine or motor operation;
- Steering and maneuvering;
- Visibility (including restrictions due to loading);
- Fork and attachment adaptation, operation, and use limitations;
- Vehicle capacity and stability;
- Any vehicle inspection and maintenance that the operator will be required to perform;
- Refueling and/or charging and recharging of batteries;
- Operating limitations; and
- Any other operating instructions, warnings or precautions listed in the operator's manual for the types of vehicles the employee is being trained to operate.

Workplace-related topics:

- Surface conditions where the vehicle will be operated;
- Composition of loads to be carried and how load stability can be maintained;
- Load manipulation, stacking, and un-stacking;
- Pedestrian traffic in areas where the vehicle will be operated;
- Narrow aisles and other restricted places where the vehicle will be operated;
- Hazardous (classified) locations where the vehicle will be operated;
- Ramps and other sloped surfaces where the vehicle will be operated;
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust; and
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation.

Refresher Training and Evaluation:

Refresher training includes a re-evaluation of training effectiveness will be conducted in the following cases:

- The operator has been observed operating in an unsafe manner;
- The operator has been involved in an accident or near miss incident;
- An evaluation has revealed that the operator has not been operating the truck safely;
- The operator has been assigned to operate a different type of truck;
- The condition of the workplace changes in a manner that could affect the operation of the truck; and
- An evaluation of each powered industrial truck operator will be conducted at least every three (3) years.

Truck Selection and Modification

- All new powered industrial trucks used in our facility will meet requirements of ANSI B56.1-1969, American National Standard for Powered Industrial Trucks, Part II.
- Any proposed alteration and/or modification that could affect truck capacity and/or safe operation must be submitted to the truck manufacturer for approval prior to implementation. Any modification affecting safe truck capacity, operation and/or maintenance will be noted on updated instruction plates, tags, and/or decals as necessary.
- All nameplate and markings for the truck and for attachments will be maintained legible and affixed to the vehicle.
• Atmosphere hazards throughout the facility have ben evaluated. Powered industrial trucks are selected based on those hazards and conform to the appropriate standards.

Truck Operation

- You must be trained and authorized to operate each type of powered industrial truck before operation;
- Riders are <u>never</u> allowed;
- Powered Industrial Trucks are different and handle differently than cars. Trucks are much heavier than cars, have poor suspension, have reduced driver visibility, and are rear-steered;
- You are responsible for obeying all safety rules and preventing injuries while operating a truck; and
- You must report any accidents or damage caused by the truck.

Pre-Shift Inspection

- You must complete a pre-shift inspection before operating the vehicle for the first time on each shift. During this inspection you should examine the following:
 - Horn/warning devices
 - o Fluid levels
 - \circ Overhead guard
 - o ID plate
 - o Fuel system
 - Load backrest

- o Brakes
- Wheels/tires
- Proper classification
- Fluid leaks
- Operational test
- If you using the truck after the pre-shift inspection has been completed, you must do a basic inspection to be sure that there are no safety problems;
- Never operate a truck that is damaged or defective! Take the truck out of service and report the situation to your supervisor; and
- Check to be sure that trailers are chocked and that trailer floors are safe before entering. Landing gear/jack stands must be capable of supporting the load plus the truck. Be sure that the truck driver does not drive away until you are out of the trailer.

Operating

- Look in the direction you are traveling, drive for conditions and yield the right of way to pedestrians;
- Keep all body parts within the operating compartment and wear your seat belt;
- Obey all facility, state and local traffic rules and signs;
- Never drive a truck up to a person standing in front of a fixed object;
- Motorized hand trucks must enter elevators and other confined areas with the load engagement end of the truck first;
- While driving, keep in mind:
 - The stability of your load;
 - Your speed (slow down when turning, going up or down ramps, or going over terrain); and
 - Your height from the ground. If the load obstructs your field of vision, you must drive in reverse.
- Do not raise the load while you are moving;
- Know the maximum lifting capacity of your truck and the weight of the material you are lifting—**never exceed the rating!**
- Travel with the load/forks as close to the ground as possible (4 in. maximum);
- Cross railroad tracks diagonally. Never park closer than 8 feet from the center of railroad tracks;
- Sound your horn and slow down or stop at all cross aisles and intersections never proceed until you know it is safe to do so;
- Never reach through or into the mast area;
- Maintain a safe distance from the edge of ramps or platforms;
- When traveling on an incline, always ascend or descend slowly:
 - A loaded truck should always have the load uphill;
 - An unloaded truck should always have the forks downhill
- Always keep at least three (3) truck lengths between trucks.

Lifting and Placing Loads

Only stable and safely arranged loads will be lifted.

To raise a load:

- Always look up before lifting the forks or a load;
- Approach the load square-on with the forks centered;
- Tilt the mast forward and lower the forks to the proper height;
- Drive into the load and square it to the back rest; and
- Lift the forks so that the load clears the ground/rack and tilt the load back to keep it engaged.

Never allow anyone to stand or walk under the forks, either empty or loaded.

To place a load, reverse the above steps:

- Square the truck with the space to be used;
- Raise the load, if necessary, and drive forward into the space;
- Tilt the load forward; and
- Lower the load slowly, disengage the forks and back up

Never tilt the mast forward except to pick up or deposit a load. Apply only enough forward or back tilt to pick up or deposit the load.

Dock Safety

- Truck brakes must be set before driving into or onto trailers with a powered industrial truck;
- Inspect all trailers before driving into or onto them;
- All trailers must be chocked at the rear wheels or have a trailer engagement system (dock lock) attached. Never enter a trailer that is not secure;
- Fixed jacks may be necessary under the fifth wheel unless the trailer is attached to a tractor;
- Prior to entering a trailer, be sure that the truck driver is aware of your actions;
- A secure dock board or bridge plate must be used for accessing trailers and rail cars; and
- Positive protection must be provided to prevent rail cars from being moved during loading/unloading operations.

Truck Parking

Anytime that you are 25 feet from the truck or it is out of your view, you must shut it down.

To shut down a truck, do the following:

- Park in a safe area (not blocking exits, aisles, fire extinguishers, emergency equipment or electrical equipment);
- Lower the load/forks to the floor and tilt the mast forward;
- Follow the truck procedure to set the brakes; and
- Turn the vehicle off.

Propane Fueling

- Park the vehicle in a safe location away from ignition sources. Be sure that there are no ignition sources present;
- Never try to refill the propane cylinder while the truck is running;
- Propane is a super cold liquid as it is stored. It will cause immediate frost bite. Wear safety glasses and gloves when refueling;
- Close the fuel valve but let the truck run until it is out of gas;
- Turn off the vehicle;
- Replace the cylinder and open the gas valve;
- Return the empty cylinder to the designated storage area;
- Do not attempt to refuel the vehicle unless you are trained and authorized to do so; and
- Do not attempt to refill cylinders unless you have been trained and authorized to do so.

Gasoline and Diesel Refueling

- Park the vehicle in a safe location away from ignition sources and turn the vehicle off. Be sure that there are no ignition sources present;
- Wear safety glasses while refueling;
- Be sure that you are using the correct fuel;
- Do not overfill the vehicle. Any spilled fuel will be allowed to evaporate or will be wiped up before starting the engine; and
- Do not attempt to refuel the vehicle unless you are trained and authorized to do so.

Battery Maintenance

- Battery acid is corrosive! Wear goggles or a face shield with safety glasses, gloves and an apron when watering the battery;
- Batteries being charged produce flammable hydrogen gas—be sure you charge in a well-ventilated area and keep all ignition sources at least 25 feet away;
- Know the location and operation of the closes eye wash station;
- Neutralize any acid spill immediately and report it to your supervisor; and
- Batteries are extremely heavy and difficult to move. Do not attempt to change a battery unless you have been trained and authorized to do and have the necessary equipment.

STABILITY TRIANGLE



POWERED INDUSTRIAL TRUCKS TRAINING PROCEDURE

CHARACTERISTICS OF OUR LIFT TRUCKS

- Sit-down riders, Class IV Powered Lift Trucks
- Liquified petroleum and battery-powered
- Rear-steered
- Up to 6000-pound capacity
- 170 inches maximum fork lift height or less
- Equipped with lift, tilt, and side shift controls
- Equipped with automatic transmissions

PRINCIPLES OF SAFE OPERATION

- Pre-operational inspection at start of each shift
- Handling of lift truck and traveling through the plant
 - Operate safely for conditions
 - Pedestrians have the right-of-way
 - Operate slowly in narrow aisles
 - Be careful when operating where there are blind spots and use your horn!
 - Load must be carried so the center of gravity is contained within the stability triangle
 - Only trained operators will be allowed to operate company lift trucks
 - Do not overload a lift truck
 - Always drive backwards when carrying a tall load
 - Never use a lift truck to lift another person with a man-lift
 - o Watch overhead clearances

REFUELING LP LIFT TRUCKS

- Turn off valve on LP tank
- Unhook feed hose
- Unclamp tank and place in designated storage rack
- Clamp full tank into place on the lift truck
- Re-hook the feed hose
- Turn on valve, listen and smell for leaks (if leaking, try reconnecting the feed hose and/or replacing the O-ring in the supply tank valve)

CHARGING BATTERY LIFT TRUCKS

- Inspect fluid levels of batteries
- Daily charge batteries

TYPICAL LOADS

- Empty steel tubs
- Full steel tubs
- Empty Gaylord boxes
- Full Gaylord boxes
- Empty raw steel racks
- Full raw steel racks
- Empty barrels

- Full barrels
- Empty scrap tubs
- Full scrap tubs
- Stacks of pallets
- Pallets with boxes of parts
- Bundles of cardboard
- Machines

ACCIDENT REPORTING

- Report all accidents (small or large) to your supervisor
- Fill out an accident report immediately

MAINTENANCE

- Report any maintenance that needs to be done to your supervisor
- Do not operate a lift truck if it is not safe

SPECIAL ATTACHMENTS

- Barrel carrier
- Tipping scrap hoppers
- Man-lift

LOADING AND UNLOADING TRUCKS

- Truck wheels are to be chocked (Lift Truck operator should verify)
- Dock plates are to be used
- Truck door is to be fully open (Lift Truck operator should verify)
- Use Loading Dock light
- If Lift Truck has lights, use them
- Inspect truck floors for holes (do not load or unload without supervisor approval)

PARKING A LIFT TRUCK

- Park away from fire extinguishers
- Never block exits
- Set parking brake
- Forks should be on the floor and tipped forward
- Leave lift tuck out of gear

SAFETY CONCERNS

- Never drive a lift truck with arms or legs hanging out of the side of it
- Never start a lift truck while in gear
- The electrical lift truck is not to be used in the Paint Room
- Always drive up inclines and back down inclines
- Always turn off LP at the end of your shift if no other shift is coming in that day
- Never race lift trucks
- Never take a rider on a lift truck
- Always make sure that your load is safe and secure
- No high speed turns
- When stacking, do it in a safe and efficient manner

FORK LIFT PROGRESSIVE DISCIPLINE

General Conduct

- Operating a forklift without a seatbelt
- Operating a forklift in forward travel with a load that cannot be seen over
- Unsafe operation of a forklift

1 st Offense	Written Warning
2 nd Offense	Written Warning
3 rd Offense	Written Warning
4 th Offense	1 Day Off and Mandatory Training
5 th Offense	3 Days Off
6 th Offense	Discharge

More Serious Violation

- More than one person on the forklift
- Failure to report an accident
- Opening or damaging an overhead door with the forklift
- Causing personal injury unintentionally while operating a forklift
- Loading or unloading trucks without wheels chocked

1 st Offense	1 Day Off and Mandatory Training
2 nd Offense	3 Days Off
3 rd Offense	Discharge

Most Serious Violation

- Causing personal injury thru obvious horseplay
- Operating the forklift under the influence of alcohol and/or drugs
- Deliberate destruction of property thru misuse of forklift
- Repeated violation of forklift safety rules (6) warning slips in (1) year from the date of the 1st warning

1st Offense Discharge

TRAINING AND RE-TRAINING PROCEDURE

- All new operators will be trained and given an examination before they are allowed to operate a lift truck.
- All current operators will be trained on the implementation of this policy.
- New operators will be given a computer-based training course with a quiz, followed by 30 to 60 minutes of hands-on training with an evaluation of their driving skills.
- Only licensed lift truck operators may train new lift truck operators.
- Licensed lift truck operators will be re-trained and evaluated at least once every three (3) years per the OSHA standard.

Herbert E. Orr Company

FIRST AID & ACCIDENT POLICY

Most accidents in the workplace are avoidable, but they can happen. We at Herbert E. Orr Company would like to have our company be 100% accident-free. If there is an accident, we would like to make sure that you know what to do both here and at home.

FIRST AID

Medical emergency numbers shall be posted with other emergency phone numbers.

Minor scrapes, cuts and bruises

- Clean the area
- Apply the band-aid or gauze to keep dirt out Note: If you are helping a fellow associate who is injured, make sure you wear disposable gloves (see Herbert E. Orr Company Bloodborne Pathogens Policy)

Should a medical emergency occur, other than minor scrapes and bruises, and it is serious enough to call for professional medical assistance, you should:

- Remain calm
- Speak clearly and slowly
- Give the exact location
- Describe the situation
- Give the phone number you are calling from
- Do not hang up until told to do so
- Send attendants to the entrances to direct the emergency responders

First aid kits are readily available as well as eye flush stations in the case of the need for them.

Safety Data Sheets are readily available for all chemicals used by Herbert E. Orr Company, as well as the Hazard Communication Plan. It is vital that all associates understand the basics of the Hazard Communication Plan and how it relates to associates' safety. Below are guidelines to be followed in a medical emergency:

- DO stay calm.
- DO check first to make sure the victim has an open airway, is breathing and has a heartbeat (If not, immediate action is necessary by a trained CPR/First Aid responder before taking care of any other injuries).
- DO control bleeding promptly. Wear disposable gloves.
- DO treat the patient gently, reassure him/her that help is coming and keep him/her as quiet as possible.
- DO tell the rescue or ambulance crew as much as you can about what happened, what the patient's condition was when you first saw him/her, and what you did.
- DO let the emergency crew do their job, and help keep other people out of the way.
- DO NOT move the patient unnecessarily.
- DO NOT try to remove an object that is impaled in the body.
- DO NOT give the patient anything to eat or drink.
- DO NOT delay in calling for help.
- DO NOT do anything you are not trained to do, or are not sure is appropriate.

MINOR BURNS

(Redness or blisters in a small area)

- Flush with cold water.
- Apply a sterile dressing.
- DO NOT use butter on any burn.
- DO NOT break open blisters.

MAJOR BURNS

(White or charred skin; blisters and redness over a large area, burns on face, hands, or genital area)

- Cover with a sterile dressing and seek medical attention promptly.
- Call an ambulance if:
 - Burns cover a very large area of the body;
 - Burns are on face or eyes;
 - The patient has difficulty breathing.
- DO NOT apply salves, ointments, or anything else unless ordered by a doctor.
- DO NOT break open blisters.

CHEMICAL BURNS

(Spilled liquid or dry chemical on skin)

- Liquid—flush with large amounts of water immediately (keep water flow gentle).
- Dry—Brush as much off as possible before flushing with water.
- After flushing at least 5 minutes, cover with a sterile dressing.
- Seek medical attention immediately. Send SDS with burn victim.
- DO NOT use anything but water on burned area.
- DO NOT break open blisters.

EYES—FOREIGN OBJECT

(Object visible, feeling of something in eye)

- Have patient pull upper eyelid over lower eyelid.
- Run plain water over eye.
- If object does not wash out, cover <u>both</u> eyes with a gauze dressing.
- Seek medical attention immediately.
- DO NOT rub the eye.

EYE—WOUNDS

(Wound on eyelid or eyeball, pain, history of blow to eye area, discoloration)

- Apply loose sterile dressing over both eyes.
- Seek medical help immediately.
- For bruising or "black eye," cold compress or ice pack may relieve pain and reduce swelling.
- DO NOT try to remove any embedded object.
- DO NOT apply pressure to the eye.

EYE—CHEMICAL BURN

(Chemical splashed or spilled in eye)

- Flush immediately with water over open eye for at least 10 minutes (20 minutes if alkali). It may be necessary to hold patient's eyelid open.
- Cover both eyes with sterile dressing.
- Seek medical help immediately. Send SDS with victim.
- DO NOT put anything but water in eye.

HEAT EXHAUSTION

(Fatigue, weakness, profuse sweating, normal temperature, pale clammy skin, headache, cramps, vomiting, fainting)

- Remove from hot area.
- Have victim lay down and raise feet.
- Apply cool, wet cloths.
- Loosen or remove clothing.
- Allow small sips of water if victim is not vomiting.

HEAT STROKE

(Dizziness, nausea, severe headache, hot dry skin, confusion, collapse, delirium, coma and death)

- Call for immediate medical assistance.
- Remove victim from hot area.
- Remove clothing.
- Have victim lay down.
- Cool the body (shower, cool wet cloths)
- DO NOT give stimulants.

Know where emergency numbers are posted. In the event of an accident or injury other than minor scrapes and bruises, get help immediately.

First Aid kits are located throughout the facility for emergency use. Locations are:

- Packaging Department office
- Tool Room

Eye wash stations are located throughout the facility for emergency use. Locations are as follows:

- Low Bay North wall
- Packaging Department North wall
- Paint Room
- Wire Form department North wall
- Waste Water building

STAY CALM DURING A MEDICAL EMERGENCY.

While it is important to do various things during a medical emergency, it is equally important to not do things during a medical emergency. Specifically, **DO NOT DO ANYTHING THAT YOU ARE NOT TRAINED TO DO AND ARE SURE IS INAPPROPRIATE.**

Remember, heat exhaustion and particularly <u>heat stroke can be very serious and</u> <u>should receive immediate professional medical attention</u>.

ACCIDENTS

In the event of an accident, the following procedure should be followed:

- If the result is a minor injury, such as a small scrape or bruise, first aid should be administered;
- If the result is of a more serious nature, an ambulance should be called and the associate taken to the Paulding Memorial Hospital. Should the accident involve a chemical, the SDS shall be provided to the emergency responder(s);
 - If treated off-site, the associate shall be drug tested to be in compliance with our Drug Free Workplace Program.
- The Herbert E. Orr Safety Director will be notified as soon as possible;
- At the earliest possible time, an accident report shall be prepared and a determination of the cause shall be made. Once the determination is made, at the next Safety Committee meeting, the causes leading up to the accident shall be discussed to prevent any reoccurrences.
- After the victim is taken care, jot down any facts about the incident as soon as possible. The primary purpose of accident investigation is not to find blame, but prevention.

BACK INJURY AVOIDANCE

One generally thinks of back injuries, as they relate to lifting, as being caused by lifting an object that is too heavy or by bending over and putting excess strain on the lower back. While that is sometimes true, back injuries can be caused by twisting motions and by repetitive lifting of relatively light objects.

To avoid back injuries, follow these guidelines:

- Keep objects as close to your body as possible;
- Keep line of sight open so that you can see where you are going;
- Take shorter strides to lessen the strain on your muscles and back;
- Wear proper footwear for maximum traction and be aware of the condition of the surface you are walking on;

Should a back injury occur, particularly as a result of a fall or accident, be aware of these symptoms: pain, tingling, numbness, inability to move one's arms or legs. Should these symptoms occur, call and ambulance immediately and DO NOT MOVE THE VICTIM. If the victim must be moved to avoid a life-threatening situation, keep the head, neck and back together as a unit and avoid twisting the body. Do not let the head fall forward or backward. Remember: Improper movement could injure the spinal cord and cause permanent damage.

SLIPS, TRIPS AND FALLS

Slips, trips and falls are among the most common industrial accidents and they are easily preventable. Below are listed some of the causes of slips, trips and falls:

- Running through the workplace
- Engaging in horseplay
- Working off a ladder that is not firmly positioned
- Carrying a large object that blocks your line of vision
- Shoes that are not laced or tied properly
- Working off a scaffold without safety rails
- Using ladders that have oil or grease on the rungs
- Not using hand rails on steps
- Messing work areas with debris on the floor
- Not paying attention to what you are doing

While accidents do happen, many slips, trips and falls could be avoided by adhering to company safety policies, common sense, and awareness of potential dangers in the workplace.

Slips, trips and falls are not limited to the workplace. In fact, falls at home are the second leading cause of death. Keep this in mind when working at home too.

ELECTRICAL WORK PRACTICES PROGRAM

Reference Standard

Occupational Safety and Health Administration:

29 CFR 1910.332 – Training

29 CFR 1910.333 – Selection and Use of Work Practices

Purpose

This program establishes safe work practices to be used to prevent electrical shock or other injuries resulting from either direct or indirect contacts, when work is performed near or on equipment or circuits which are or may be energized.

Scope

This procedure applies to all company employees, contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company.

Responsibilities

- Management and supervisors are responsible for enforcement of this program;
- Management will ensure that required training is conducted; and
- Employees, Contractors and vendors are required to comply with all procedures outlined in this policy.

Definitions

De-energized: Free from any electrical connection to a source of potential difference and from electrical charge.

Energized: Electrically connected to a source of potential difference.

Insulated: Separated from other conducting surfaces by a dielectric (including air space) offering a high resistance to the passage of current.

Qualified person: One who has received training in and has demonstrated skills and knowledge in the construction and operation of electric equipment and installations and the hazards involved.

Procedure

De-energized parts

Live parts to which an employee may be exposed must be de-energized before the employee works on or near them, unless the employer can demonstrate that deenergizing introduces additional or increased hazards or is infeasible due to equipment design or operational limitations.

Live parts that operate at less than 50 volts to ground need not be de-energized if there will be no increased exposure to electrical burns or to explosion due to electric arcs.

Energized parts

If the exposed live parts are not de-energized (for reasons of increased or additional hazards or infeasibility), other safety-related work practices must be used to protect employees who may be exposed to the electrical hazards involved. Such work practices must protect employees against contact with energized circuit parts directly with any part of their body or indirectly through some other conductive object. The work practices that are used must be suitable for the conditions under which the work is to be performed and for the voltage level of the exposed electric conductors or circuit parts.

Working on or near exposed de-energized parts

This applies to work on exposed de-energized parts or near enough to them to expose the employee to any electrical hazard they present. Conductors and parts of electric equipment that have been de-energized but have not been locked out or tagged must be treated as energized parts.

Lockout and tagging: While any employee is exposed to contact with parts of fixed electric equipment or circuits which have been de-energized, the circuits energizing the parts must be locked out or tagged or both in accordance with the requirements below.

De-energizing equipment

- Safe procedures for de-energizing circuits and equipment must be determined before circuits or equipment are de-energized.
- The circuits and equipment to be worked on must be disconnected from all electric energy sources. Control circuit devices, such as push buttons, selector switches and interlocks, may not be used as the sole means for de-energizing circuits or equipment. Interlocks for electric equipment may not be used as a substitute for lockout and tagging procedures;
- Stored electric energy which might endanger personnel must be released. Capacitors must be discharged and high capacitance elements must be shortcircuited and grounded, if the stored electric energy might endanger

personnel. Note: If the capacitors or associated equipment are handled in meeting this requirement, they must be treated as energized;

• Stored non-electrical energy in devices that could reenergize electric circuit parts must be blocked or relieved to the extent that the circuit parts could not be accidentally energized by the device;

Application of locks and tags:

- A lock and a tag must be placed on each disconnecting means used to deenergize circuits and equipment on which work is to be performed. The lock must be attached so as to prevent persons from operating the disconnecting means unless they resort to undue force or the use of tools;
- Each tag must contain a statement prohibiting unauthorized operation of the disconnecting means and removal of the tag;
- If a lock cannot be applied, or if the employer can demonstrate that tagging procedures will provide a level of safety equivalent to that obtained by the use of a lock, a tag may be used without a lock;
- If a tag is used without a lock it must be supplemented by at least one additional safety measure that provides a level of safety equivalent to that obtained by use of a lock. Examples of additional safety measures include the removal of an isolating circuit element, blocking of a controlling switch, or opening of an extra disconnecting device; and
- A lock may be placed without a tag only under the following conditions:
 - Only one circuit or piece of equipment is de-energized;
 - The lockout period does not extend beyond the work shift; and
 - Employees exposed to the hazards associated with reenergizing the circuit or equipment are familiar with this procedure.

The requirements of this paragraph must be met before any circuits or equipment can be considered and worked as de-energized.

A qualified person must operate the equipment operating controls or otherwise verify that the equipment cannot be restarted. They also must use test equipment to test the circuit elements and electrical parts of equipment to which employees will be exposed and must verify that the circuit elements and equipment parts are de-energized. The test must also determine if any energized condition exists as a result of inadvertently induced voltage or unrelated voltage backfeed even though specific parts of the circuit have been de-energized and presumed to be safe. If the circuit to be tested is over 600 volts, nominal, the test equipment must be checked for proper operation immediately after this test.

Reenergizing equipment

These requirements must be met, in the order given, before circuits or equipment are reenergized, even temporarily:

- 1. A qualified person must conduct tests and visual inspections, as necessary, to verify that all tools, electrical jumpers, shorts, grounds, and other such devices have been removed, so that the circuits and equipment can be safely energized;
- 2. Employees exposed to the hazards associated with reenergizing the circuit or equipment must be warned to stay clear of circuits and equipment;
- 3. Each lock and tag must be removed by the employee who applied it or under his or her direct supervision. However, if this employee is absent from the workplace, then the lock or tag may be removed by a qualified person designated to perform this task provided that:
 - a. The employer ensures that the employee who applied the lock or tag is not available at the workplace; and
 - b. The employer ensures that the employee is aware that the lock or tag has been removed before he or she resumes work at that workplace;
- 4. There must be a visual determination that all employees are clear of the circuits and equipment.

Working on or near exposed energized parts

This applies to work performed on exposed live parts (involving either direct contact or by means of tools or materials) or near enough to them for employees to be exposed to any hazard they present.

Work on energized equipment

Only qualified persons may work on electric circuit parts or equipment that have not been de-energized under the procedures of the previous section. Such persons must be capable of working safely on energized circuits and must be familiar with the proper use of special precautionary techniques, personal protective equipment, insulating and shielding materials, and insulated tools.

Overhead lines

If work is to be performed near overhead lines, the lines must be de-energized and grounded, or other protective measures must be provided before work is started.

If the lines are to be de-energized, arrangements must be made with the person or organization that operates or controls the electric circuits involved to de-energize and ground them. If protective measures, such as guarding, isolating or insulating, are provided, these precautions must prevent employees from contacting such lines directly with any part of their body or indirectly through conductive materials, tools or equipment.

Unqualified persons

When an unqualified person is working in an elevated position near overhead lines, the location must be such that the person and the longest conductive object he or she may contact cannot come closer to any unguarded, energized overhead line than the following distances:

- For voltages to ground 50kV or below 10 feet (305 cm);
- For voltages to ground over 50kV 10 feet (305 cm) plus 4 inches (10 cm) for every 10kV over 50kV.

When an unqualified person is working on the ground in the vicinity of overhead lines, the person may not bring any conductive object closer to unguarded, energized overhead lines than the distances given in Table 1.

Qualified persons

When a qualified person is working in the vicinity of overhead lines, whether in an elevated position or on the ground, the person may not approach or take any conductive object without an approved insulating handle closer to exposed energized parts than shown in Table 1, unless:

- The person is insulated from the energized part (gloves, with sleeves if necessary, rated for the voltage involved are considered to be insulation of the person from the energized part on which work is performed);
- The energized part is insulated both from all other conductive objects at a different potential and from the person; or
- The person is insulated from all conductive objects at a potential different from that of the energized part.

TABLE 1 - APPROACH DISTANCES FOR QUALIFIED EMPLOYEES - ALTERNATING CURRENT		
Voltage range (phase to phase)	Minimum approach distance	
300V and less	Avoid Contact	
Over 300V, not over 750V	1 ft. 0 in. (30.5 cm)	
Over 750V, not over 2kV	1 ft. 6 in. (46 cm)	
Over 2kV, not over 15kV	2 ft. 0 in. (61 cm)	
Over 15kV, not over 37kV	3 ft. 0 in. (91 cm)	
Over 37kV, not over 87.5kV	3 ft. 6 in. (107 cm)	
Over 87.5kV, not over 121kV	4 ft. 0 in. (122 cm)	
Over 121kV, not over 140kV	4 ft. 6 in. (137 cm)	

Vehicular and mechanical equipment

Any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines must be operated so that a clearance of 10 ft. (305 cm) is maintained. If the voltage is higher than 50kV, the clearance must be increased 4 in. (10 cm) for every 10kV over that voltage. However, under any of the following conditions, the clearance may be reduced:

- If the vehicle is in transit with its structure lowered, the clearance may be reduced to 4 ft. (122 cm). If the voltage is higher than 50kV, the clearance must be increased 4 in. (10 cm) for every 10 kV over that voltage;
- If insulating barriers are installed to prevent contact with the lines, and if the barriers are rated for the voltage of the line being guarded and are not a part of or an attachment to the vehicle or its raised structure, the clearance may be reduced to a distance within the designed working dimensions of the insulating barrier; and
- If the equipment is an aerial lift insulated for the voltage involved, and if the work is performed by a qualified person, the clearance (between the uninsulated portion of the aerial lift and the power line) may be reduced to the distance given in Table 1.

Employees standing on the ground may not contact the vehicle or mechanical equipment or any of its attachments, unless:

- The employee is using protective equipment rated for the voltage; or
- The equipment is located so that no un-insulated part of its structure (that portion of the structure that provides a conductive path to employees on the ground) can come closer to the line than permitted in the opening paragraph of this section;

If any vehicle or mechanical equipment capable of having parts of its structure elevated near energized overhead lines is intentionally grounded, employees working on the ground near the point of grounding may not stand at the grounding location whenever there is a possibility of overhead line contact. Additional precautions, such as the use of barricades or insulation, must be taken to protect employees from hazardous ground potentials, depending on earth resistivity and fault currents, which can develop within the first few feet or more outward from the grounding point.

Illumination

Employees may not enter spaces containing exposed energized parts, unless illumination is provided that enables the employees to perform the work safely.

Where lack of illumination or an obstruction affects clear visibility of the work to be performed, employees may not perform tasks near exposed energized parts. Employees may not reach blindly into areas which may contain energized parts.

Confined or enclosed work spaces

When an employee works in a confined or enclosed space (such as a manhole or vault) that contains exposed energized parts, the employer must provide, and the employee must use, protective shields, protective barriers or insulating materials as necessary to avoid inadvertent contact with these parts. Doors, hinged panels and the like must be secured to prevent their swinging into an employee and causing the employee to contact exposed energized parts.

Conductive materials and equipment

Conductive materials and equipment that are in contact with any part of an employee's body must be handled in a manner that will prevent them from contacting exposed energized conductors or circuit parts. If an employee must handle long dimensional conductive objects (such as ducts and pipes) in areas with exposed live parts, the employer must institute work practices (such as the use of insulation, guarding and material handling techniques), which will minimize the hazard.

Portable ladders

Portable ladders must have nonconductive side rails if they are used where the employee or the ladder could contact exposed energized parts.

Conductive apparel

Conductive articles of jewelry and clothing (such a watch bands, bracelets, rings, key chains, necklaces, metalized aprons, cloth with conductive thread or metal headgear) may not be worn if they might contact exposed energized parts. However, such articles may be worn if they are rendered nonconductive by covering, wrapping or other insulating means.

Housekeeping duties

Where live parts present an electrical contact hazard, employees may not perform housekeeping duties at such close distances to the parts that there is a possibility of contact, unless adequate safeguards (such as insulating equipment or barriers) are provided. Electrically conductive cleaning materials (including conductive solids such as steel wool, metalized cloth and silicon carbide, as well as conductive liquid solutions) may not be used in proximity to energized parts unless procedures are followed which will prevent electrical contact.

Training

Employees will be trained in and familiar with the safety-related work practices required by this program that pertain to their respective job assignments.

Qualified persons (i.e. those permitted to work on or near exposed energized parts) must, at a minimum, be trained in and familiar with the following:

- The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment;
- The skills and techniques necessary to determine the nominal voltage of exposed live parts; and
- The clearance distances specified in Table 1 and the corresponding voltages to which the qualified person will be exposed.

Training can be either classroom or on-the-job, or a mixture of both.

In summary, follow these safe practices:

- Follow Herbert E. Orr Company Lock-out/Tag-out Policy when working on any electrical device;
- Never work around an open electrical cabinet;
- Work on energized equipment shall be done only by qualified associates associates working on energized equipment involving direct contact or contact with tools must have appropriate training;
- If work is to be performed near overhead lines, they must be de-energized;
- Associates may not enter spaces containing energized parts unless they are illuminated to provide the associate with proper illumination to perform work safely;
- Doors and hinged panels shall be secured open to prevent swinging into the associate and causing contact with exposed energized parts;
- Conductive materials or equipment that are in contact with associate's body shall be handled in a manner to prevent contact with exposed energized parts;
- Portable ladders shall have non-conductive siderails if they are to be used where an associate or ladder could contact exposed energized parts.
- Never wear conductive articles of jewelry or clothing;
- When electrical work is being performed, other associates may not work within five (5) feet of the device;
- Only qualified maintenance associates shall be allowed to defeat a safety interlock—this may be done temporarily while the equipment is being repaired. The interlock must be returned to its operable condition before production is resumed;
- Portable electric equipment shall be handled in a manner as to not cause damage. Electric cords shall never be used to pick up or lower electrical equipment;
- Before plugging in an electrical cord, each associate should verify there is no damage to the cord in any way. If damaged, it must be replaced before use. It cannot be taped or spliced together;
- All cords with a 3-prong plug must be plugged into an appropriate outlet. Do not remove the ground prong. If an appropriate plug is unavailable, a 3-prong adapter may be used except in highly conductive work locations;
- Associates should always make sure their hands are not wet when plugging in an electrical device;
- Locking type connectors are to be secured after connection;
- Load-rated switches, circuit breakers, and other devices specifically designed as disconnects shall be used for opening, closing, or reversing circuits under load. Do not use cable connectors, fuses, or terminal lugs for such purposes;

- Only qualified maintenance personnel may use test instruments when performing test work on electrical circuits or equipment;
- All protective equipment shall be maintained in a safe and reliable condition. Protective devices and equipment shall be stored in a clean, dry compartment or box that will protect such equipment from punctures, snags, or moisture. The protective equipment shall be periodically inspected or tested. Unsafe equipment must be removed from use immediately;
- Insulated tools must be used when performing electrical work;
- Fuse-handling tools are to be used for the removal and replacement of fuses;
- Safety signs and tags are to be used to inform all associates of electrical hazards;
- All associates working on an electrical device shall use caution as to not endanger themselves or fellow associates;
- Plugs, plug-ins, and cords shall be checked on a regular basis throughout the facility for damage, missing prongs, frayed cords, etc. Replacement is to be immediate before the device is allowed back in use. Permanent fixtures to which the lamp socket and plugs are attached shall be the type approved for that location.
- Read and heed all data stickers on electric switches.
- It shall be the responsibility of the associate to comply with OSHA and NEC standards.

HAZARD COMMUNICATION PROGRAM

Reference Standard

Occupational Safety and Health Administration: 29 CFR 1910.1200, Subpart Z - Hazard Communication

Purpose

This procedure establishes minimum requirements for the following:

- Identification and labeling of hazardous chemicals.
- Employee access to hazardous chemical information.
- Training required to prevent injury or illness due to hazardous chemical exposure.

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, as well as all other individuals who are visiting or have business with our company.

Responsibilities

- Management is responsible for identifying hazardous substances and for maintaining this program. Management will review this procedure at least annually and when new hazardous substances are introduced.
- Management and supervisors are responsible for the implementation and enforcement of this program.
- Employees must comply with all procedures outlined in this policy.
- Contractors and vendors shall comply with all procedures outlined in this policy.

Definitions

Article: A manufactured item other than a fluid or particle:

- Which is formed to a specific shape or design during manufacture;
- Which has end use function(s) dependent in whole or in part upon its shape or design during end use; and
- Which under normal conditions of use does not release more than very small quantities (for example: minute trace amounts of a hazardous chemical and does not pose a physical or health risk to employees).

Chemical: any element, chemical compound or mixture of elements and/or compounds.

Container: any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. Pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Contractor: A non-company employee being paid to perform work in our facility.

Hazardous Chemical: a chemical that is a physical or a health hazard.

Health Hazard: A chemical that is carcinogenic, toxic, a reproductive hazard, an irritant, a corrosive, a sensitizer, or damages anybody system or part.

Safety Data Sheet (SDS): An SDS is a written document prepared by the chemical manufacturer or supplier that details the contents, hazards, proper use directives and emergency response protocol for a hazardous chemical.

Physical Hazard: A chemical which is a combustible liquid, a compressed gas, explosive, flammable, organic peroxide, oxidizer, pyrophoric, unstable, or water reactive.

Vendor: A non-company employee performing a service in our facility.

Program Application

This program will be applicable to all chemicals that exhibit or could exhibit health hazards or physical hazards under normal operating conditions or during emergencies. However, the following materials are exempt from this program:

- Consumer products when used in the workplace in a duration and frequency that is not greater than that experienced by a regular consumer;
- Articles (see Definition above);
- Any drug, as that term is defined in the Federal Food, Drug, and Cosmetic Act, when it is in solid, final form for direct administration to the patient (for example, tablets or pills); drugs which are packaged by the chemical manufacturer for sale to consumers in a retail establishment (such as overthe-counter drugs); and drugs intended for personal consumption by employees while in the workplace (for example, first aid supplies);
- Cosmetics which are packaged for sale to consumers in a retail establishment, and cosmetics intended for personal consumption by employees while in the workplace;
- Wood or wood products that will not be processed (wood treated with hazardous chemicals, or that will be processed generating dust are not exempt);
- Food and alcoholic beverages in retail establishments and food that will be consumed in the workplace; and
- Tobacco and tobacco products.

Procedures

Material Ordering and Hazard Determination

Any employee wishing to introduce a new chemical into the facility must obtain an SDS and submit the SDS to the program administrator prior to ordering the chemical. The program administrator will evaluate all new or replacement chemicals to determine if the chemical presents health hazards for our employees or to our facility.

If the program administrator determines that the new chemical cannot be handled safely, the chemical will not be ordered. Information on new chemicals, or new information pertaining to chemicals that are currently used will be communicated to affected employees by the program administrator. Every effort will be made to select chemicals that are not hazardous or that present the minimum degree of hazard commensurate with necessary chemical capability.

Hazardous Chemical List

A list of hazardous chemicals currently used within the facility will be maintained by the program administrator (see Appendix A for the Hazardous Chemical Inventory). As new chemicals are purchased, the necessary information will be added to the Inventory. Obsolete chemicals will be removed from the List.

Safety Data Sheets

An SDS will be maintained for all hazardous chemicals, including those purchased at retail locations. The SDS will be available to all employees on all shifts. If our plant decides to use electronic means to maintain the SDS file, employee availability will be assured including at all times including during power failures.

The program administrator will contact the chemical supplier or manufacturer and request an SDS for chemicals held in quarantine or refused by receiving.

The SDS file and Hazardous Chemical List will be maintained in the following location:

Environmental/IT Manager's office

Obsolete SDS will be removed from the active file and will be maintained in a separate file by the program administrator for 30 years.

Labels and Other Hazard Warnings

All containers containing hazardous chemicals will be labeled with the following information:

- The identity of the hazardous chemical; and
- The appropriate hazard warnings alerting employees of the health and physical hazards presented by the chemical.
- Solid metal, wood and plastic not exempted as articles, as well as grain will not be labeled but will have label information available within the SDS.
- All incoming hazardous chemicals containers will be inspected by receiving personnel. Containers that are not properly labeled will be labeled by the receiving personnel. Containers with hazardous contents that are not listed on the Hazardous Chemical List will be refused or will be placed in quarantine and the program administrator notified immediately.
- The program administrator must approve all labels used within our facility. Each departmental supervisor is responsible for insuring that all hazardous chemical containers, including containers that are refillable from bulk containers, are labeled properly and that the label is visible. Stationary tanks, reservoirs and sumps containing hazardous chemicals will also be labeled.
- Labels will not be removed or covered over.

Training

Training as outlined below will be provided at the following times:

- At time of initial assignment;
- Whenever a new hazardous chemical is introduced, or when the hazard information regarding a currently used chemical changes or when the program elements change; and
- Whenever the program administrator or other management members determine through observation that retraining would be beneficial.

Training will consist of a(n):

- Overview of this program;
- Review of operations where hazardous chemicals are present;
- Location of the written hazard communication program, hazardous chemical list and SDS file;
- Methods and observations used to detect the presence or release of hazardous chemicals;
- Physical and health hazards of chemicals in the work area (Note: we will present categories of hazards and advise employees to review labels and SDS for chemical specific information);
- Measures that employees are required to take to protect themselves from hazards including: procedures, work practices, emergency procedures and personal protective equipment requirements; and
- Explanation of the labeling system and how to read an SDS so that this information can be used appropriately by all personnel.

Non-Routine Tasks

Whenever a non-routine job involving work with hazardous chemicals is required, special training will be provided for all affected employees prior to the job. The training will include:

- Hazardous chemicals to be used in the non-routine task;
- Protective measure required to perform the work safely;
- Emergency procedures; and
- An opportunity to ask questions or ask for additional information

Contractors

Contractors who will bring hazardous chemicals into our facility must:

- Provide the program administrator with a list and an SDS for each hazardous chemical that will be used in our facility;
- Maintain a copy of the SDS for each approved chemical on site;
- Not bring chemicals into our facility unless approved by the program administrator; and
- Comply with all provisions of the Hazard Communication Standard that is applicable to their company.

Our Company reserves the right to refuse the use of chemicals based upon our evaluation. We also reserve the right to terminate the use of chemicals at any time based upon variable conditions within our facility.

Contractors will be provided the following information whenever their work location could bring them into contact with our hazardous chemicals.

The hazardous chemicals that they may be exposed to while performing the specified work and how to obtain a copy of appropriate SDS

Necessary job precautions to work safely within the proximity of the chemicals involved.

SDS and Chemical Inventory

This same information can be found on a Safety Data Sheet, referred to as an SDS. All hazardous chemicals entering our plant are either accompanied by or preceded by an SDS. Within our plant there are notebooks containing all SDS's. They are located in the **Environmental/IT Manager's office**.

These books list all of our hazardous materials, their manufacturers, and in what area they may be found. The name of each material is highlighted on each SDS.

When working in an area, every associate should be aware of what hazardous materials are in that area and any and all precautions that should be taken. This includes any special protective equipment that may be necessary. Your supervisor can tell you what protective equipment is required and how to obtain it.

For more information, see Herbert Orr Company Emergency Spill Cleanup Policy and Herbert Orr Company Hazard Communication Policy.

Throughout the plant are eye wash and drenching stations for emergency use. Some are located:

- North wall in Low Bay
- Waste Water building
- Paint Room
- East wall of High Bay
- East wall of Packaging Department
- East wall of Wireform Department

In any case, any and all accidents, spills, leaks should be reported immediately to your supervisor, Safety Director, or any other member of management.

CRANES & HOISTS SAFETY PROGRAM

Reference Standard

Occupational Safety and Health Administration Material Handling and Storage, Subpart N including: 29 CFR 1910.179

Purpose

This procedure establishes minimum criteria for the maintenance and use of overhead and gantry cranes

Scope

This procedure applies to all of our company employees, all contractors and vendors performing work on company property, and all other individuals who are visiting or have business with our company. *All cranes, including jibs, in our facility will comply with this procedure.*

Responsibilities

- Management is responsible for development and review of this program:
 - Have the hoist OSHA-inspected once per year;
 - Have monthly preventative maintenance completed at the beginning of a shift. The upper limit of each hoist shall be tested with no load;
 - Have daily preventative maintenance completed;
- Management is also responsible for appropriate employee training.
- Management and supervisors are responsible for enforcement of this program.
- Employees shall comply with all procedures outlined in this policy:
 - Examine the cables for kinks, frays, or being off of the drum;
 - Examine all hoist components for damage;
 - Examine all lifting, chains, slings, cables for kinks, twists and/or stretched areas;
 - Examine all lifting pins and shackles for wear and cracks;
 - Make sure that all guards are in place.

Definitions

Bridge: The part of the crane that carries the trolley and that is supported on both ends by a runway

Contractor: A non-company employee being paid to perform work in our facility.

Crane: A machine for lifting and lowering a load and moving it horizontally, with an integral hoisting mechanism.

Gantry crane: A crane, similar to an overhead crane except that the bridge for carrying the trolley is rigidly supported by two or more legs on fixed rails or the runway.

Hoist: The device that lifts and lowers a load.

Load block: The assembly that is used as the attachment point for the load to be lifted.

Overhead crane: A crane with a moveable bridge carrying a movable or fixed hoisting mechanism and traveling overhead on a fixed runway structure, commonly called a bridge crane.

Runway: Rails or other framework on which the crane or trolley travels.

Trolley: The part of the crane that carries the hoist.

Vendor: A non-company employee being paid to perform a service in our facility.

Procedure

General Requirements

Crane and hoist modifications will only be made as follows:

- Using components supplied by or approved by the manufacturer;
- By a qualified engineer or the manufacturer;
- Modified cranes and hoists will be tested prior to being returned to service;
- All cranes and hoists will be marked with their rated load. Cranes will be marked on each side. The markings must be legible from the ground or floor;
- Each hoisting unit or load block must be marked with its rated load. The marking must be legible from the ground or floor;
- Only trained and authorized personnel are allowed to operate cranes and hoists;
- Crane operational areas will be located or marked so that no pedestrian or vehicle traffic routinely travels below the operational zone;
- All cranes with a power traveling mechanism that are not floor operated will be equipped with an automatic warning device to warn of bridge or trolley travel;
- Load hooks equipped with a safety catch will have the safety catch maintained and used at all times;
- Any crane or hoist that is found to be defective, damaged or not operating properly will be immediately removed from service; and
- At no time will the maximum rated load of a crane or hoist be exceeded.

Inspections

Before Use Inspection

Prior to each use the crane operator will:

- Visually examine the crane and/or hoist to check for damage or missing parts including:
- Hooks;
- Chains and wire rope;
- Hydraulic and/or pneumatic components, if present;
- Test all functional mechanisms for improper adjustment; and
- Test the function of the upper load limit switch;

Frequent Inspection

On a *daily* or *monthly* basis, a written inspection (see appendix A) will be conducted on:

- Hooks;
- Hoist chains and wire rope;
- Functional operation of all controls including limit switch; and
- Hydraulic and/or pneumatic components if present.

Periodic Inspection

On an *annual* basis a written inspection (see appendix B) will be conducted by a qualified contractor or an employee qualified by training and/or experience, and consisting of:

- All elements listed under Frequent Inspection;
- Deformed, cracked or corroded parts;
- Loose bolts or rivets;
- Cracked or worn sheaves or drums;
- Excessive wear on brake system parts;
- Load, wind and other indicators over their entire functional range;
- Power plants including conformance to safety standards;
- Excessive wear of chain drive sprockets;
- Excessive chain stretch;
- Electrical components;
- Control components; and
- All additional inspection elements as required by the manufacturer.

New or Altered Cranes

Prior to use new or modified cranes or hoists will be tested as follows:

- Hoisting and lowering;
- Trolley travel;
- Bridge travel;
- Limit switches, locking and safety devices;
- The trip setting of the limit switches will be set to prevent contact of the of the hook or block with any part of the trolley; and
- Rated load test with a known weight load not to exceed 125% of the rated load unless recommended by the manufacturer.

Cranes Not in Regular Service

- Cranes that are idle for more than one month but less than six months will receive a Frequent Inspection as detailed above; and
- Cranes that are idle for longer than 6 months will receive Periodic Inspection, as detailed above
Crane and Hoist Operation

General Safety Requirements

- Read the manufacturer operator manual;
- Perform a visual inspection prior to each use;
- Only trained and authorized personnel can operate cranes and hoists;
- The operator is responsible for the safety of other personnel and material in the area;
- The operator must communicate crane and hoist movement to others in the area who may be affected. Sound the warning signal when approaching personnel;
- Cranes must not be used to lift personnel unless the crane is approved for that service and an approved personnel cage or basket is used;
- The maximum load rating must never be exceeded;
- Operators must check the path of their lift and set down point for obstructions and ensure the path is clear.

Operation

- The hoist chain or rope will be maintained free of kinks and knots and will not be wrapped around a load;
- Use only approved slings and lifting devices that have been inspected prior to use;
- The load must be attached by means of slings, chains or other lifting devices specifically designed for this purpose;
- The load must be secure and balanced with the hook at or near the balance point of the load;
- The sling, chains and other lifting devices must not be twisted upon themselves and/or with the hoist chain/rope;
- The operator must not place any body part under a suspended load;
- A suspended load must never be lifted over people;
- Loads will be moved with fluid motions avoiding sudden starts or stops;
- Side pulls are not allowed;
- Do not use limit switches to stop crane or hoist motion: use the controls;
- Test hoist breaks whenever lifting a load approaching maximum capacity: lift the load a few inches and stop motion with the brakes;
- If a load starts to slip or fall do not try to stop it: get to a safety area away from the drop zone;
- When two or more cranes are used in one lift a qualified person must be in charge of the operation;
- A load will not remain suspended without the crane operator being at the controls.

EMERGENCY SPILL CLEANUP POLICY

Herbert E. Orr Company is committed to providing a safe and healthy workplace for its associates. With this in mind, an Emergency Spill Policy is in place to help associates identify the hazards and how to protect themselves by proper work practice. A safety and health training program will be provided to the associates to ensure compliance with regulations.

Procedure

In case of a spill, the following procedure will be followed:

- Get out of the way of the spill.
- Seal off the area and alert others.
- Identify what you saw.
- Get your supervisor.

After you and your supervisor return to the area, the following procedure shall be followed:

- Identify and evaluate the hazard;
- Prepare a plan of action to control, remove, and clean the site;
- Notify those required if applicable;
- Get the proper equipment and materials (check SDS's);
- Contain the spill;
- Spills shall be cleaned up promptly (use required PPE;
- Dispose of the cleaned-up materials. Combustible waste material and residue shall be kept to a minimum, stored in a closed, metal waste can, and disposed of daily;
- Complete Emergency Spill Report and give to the Safety Director.
- Initiate the appropriate medical surveillance with associates, if necessary.

Emergency Contacts

In case of a spill, notifications are as follows:

- Petroleum products
 - Under one gallon, clean up;
 - Over one gallon, clean up and complete Emergency Spill Report.
- Hazardous materials
 - Any spill, complete Emergency Spill Report
- Any spill which goes into the sewer system:
 - Sheriff Department (419-399-3791)
 - Safety Director (260-715-5990)

Required Equipment

- Floor Dry
- Absorbent snakes or oil pads
- Brooms and shovels
- Gloves (appropriate for the task and chemical)
- Throw-away coveralls
- Boots
- Respirators
- Face Shields
- Hazardous material tags

Disposal

Non-hazardous materials:

These materials can be placed in the 1 yard dump hopper. If hopper is full, it can be dumped into the smaller roll-off's.

Hazardous materials:

These materials are to be placed in a 55-gallon barrel. The barrel is to be sealed, tagged with the appropriate tag, and placed in the chemical and hazardous waste storage area.

Note: Only lift truck drivers with hazardous material training are allowed to transport the 55-gallon barrel.

	SPILL RESPONSE
Date of Drill:	
Spill Substance: 🗌 Oil 🔲 Pa	aint 🗌 Chemical Other:
Spill simulated or actual? 🛛 Sir	mulated 🗌 Actual
1. Were there any barriers, issues, problem	ns, concerns with:
Alerting/notifying people affected b If yes, explain.	by the spill? 🗌 Yes 🗌 No 🗌 N/A
Using SDS sheets effectively? If yes, explain.	Yes No N/A
Selecting and using spill controls ma If yes, explain.	aterials? 🗌 Yes 🗌 No 🗌 N/A
Using emergency phone #'s, eyewa If yes, explain.	ish stations or first aid? 🗌 Yes 🗌 No 🗌 N/A
Ventilating the area of the spill? If yes, explain.	Yes No N/A
Using the appropriate personal pro If yes, explain.	tective equipment? 🗌 Yes 🗌 No 🗌 N/A
Equipment shut-off procedures? If yes, explain.	Ves No N/A
 Lessons learned and/or areas for improv 	vement:
3. People involved: Print Name	Sign Name

Herbert E. Orr Company

HOUSEKEEPING POLICY

Herbert E. Orr Company feels that it is the responsibility of all associates and management to keep our facility and grounds clean and safe. We have customers who visit our facility to inspect our work. When our facility looks good, it also reflects on our product. A company that takes pride in having a clean facility and well-kept grounds will also take pride in its work.

Responsibilities

Management Responsibilities

- Supply the necessary tools and equipment to maintain a clean facility;
- Keep the building and its grounds clean and looking nice;
- Supply the necessary bins, barrels, etc. for the proper disposal of trash, hazardous materials, reject parts, etc. Receptacles are to be kept clean and maintained in a sanitary condition;
- Maintain the facility to prevent the entrance of harborage of rodents, insects and other vermin.

Associate Responsibilities

- Keep your work area picked up and swept daily;
- Keep the aisles in your work area picked up and clean;
- Keep the lunchroom, break rooms, and restrooms picked up. Throw away your trash when you leave.

Everyone's Responsibilities

- When you are walking from one place to another in the facility, pick up anything you see on the ground and dispose of it properly;
- Associates who smoke shall dispose of their butts in a proper container;
- Associates who chew tobacco shall not spit on the floor or in parts containers.

Safety Concerns

- Cardboard is a slipping hazard and must be picked up and disposed properly;
- Hot metal must be picked up immediately if dropped;
- Broken skids are to be removed from service and place in the proper area for disposal;
- Spills are to be cleaned up immediately. The floor of every workroom shall be maintained in a dry condition. Note: Check with your supervisor on the proper method of cleanup and disposal;
- All containers shall be properly labeled;
- All offices, storerooms and work areas shall be kept clean and orderly;

Daily Duties

- Place beverage cans in the proper containers;
- Place cigarettes in proper container, not on the floor or ground;
- Check with your supervisor on how to tag and store re-work parts;
- Check with your supervisor on how to dispose of unusable parts and purchased supplies;
- All scrap must be weighed and the weight given to your supervisor before it can be disposed of.
- All sweepings, solid or liquid wastes, refuse and garbage shall be removed in such a manner as to avoid creating a menace to health and to keep the facility in a sanitary condition.

Herbert E. Orr Company

FIRE PROTECTION POLICY

Herbert E. Orr Company hopes that this policy never needs to be used, but in case of fire, we want to ensure that no one is injured. The purpose of this policy is to let all associates what to do in case of fire. Each associate should familiarize themselves with this policy. A sufficient number of associates will be trained in order to assist in the safe and orderly emergency evacuation.

Small Fires

- Know where the nearest fire extinguisher is located where you are working;
- To use a fire extinguisher, use the P-A-S-S method:
 - Pull out the pin
 - Aim at the base of the fire
 - Squeeze the handle
 - Spray back and forth at the base of the fire
- Call your supervisor;
- The fire department should be called to:
 - o Ensure the small fire does not spread
 - o To ensure the fire is totally out
 - \circ $\;$ Determine the cause of the fire to prevent reoccurrence.

Large Fires

- Call the 9-1-1 immediately!
- Notify your supervisor;
- Evacuate the building if supervisor deems it necessary;
- Turn off gas to the building.

Evacuation

- Supervisor will make announcement over the loud speaker. There may also be a loud alarm;
- Shut your machine down;
- Leave by the nearest safe exit;
- Assemble in the designated assembly area:
 - North of the building by the flagpole. If that is unavailable, meet at:
 - o Northwest of the building near the Bakle building
- Supervisors will ensure that everybody is accounted for by taking roll call;
- Close all doors when exiting the building;
- DO NOT ENTER AN AREA THAT HAS BEEN EVACUATED!
- NO ONE RE-ENTERS THE BUILDING UNTIL ALL CLEAR IS GIVEN.

Fire Safety

- In case of fire, stay calm;
- Keep potential fire hazards cleaned up, such as oily rages, cardboard, etc.
- Report all fire hazards to your supervisor;
- If a fire extinguisher is used, give it to your supervisor to be re-charged;
- All fire extinguishers will be mounted, located and identified for easy accessibility;
- All fire extinguishers will be inspected monthly. An annual inspection shall be done by our fire extinguisher vendor;
- All exits will be clearly marked.
- All emergency exits will have a four (4) foot aisle leading to the door;
- Never smoke when operating a lift truck;
- Never smoke when replacing a lift truck fuel cylinder;
- When welding or using a torch, care must be taken that there are no combustibles in the area;
- Combustible liquids and trash must be segregated and stored away from ignition sources;
- Maintenance will regularly and properly maintain the furnace equipment to prevent accidental ignition of combustible materials;
- All associates will be trained in regard to this policy.

REMEMBER: PEOPLE ARE MORE IMPORTANT THAN BUILDINGS AND EQUIPMENT. IF A FIRE CANNOT BE CONTROLLED, ALERT OTHERS AND EVACUATE IMMEDIATELY! REMAIN CALM DURING EMERGENCY SITUATION.

Herbert E. Orr Company

FACILITY MAPS AND EMERGENCY CONTACTS

Figure 1-Fire Extinguisher, Eye Wash & Spill Kit Locations	. 113
Figure 2-Emergency Exit Locations	. 114
Figure 3-Emergency Contact List	. 115



Figure 1-Fire Extinguisher, Eye Wash & Spill Kit Locations



Figure 2-Emergency Exit Locations

Herbert E. Orr Co. Emergency Contact List Effective 08/10/2018

Emergency Services		
Paulding Fire Dept/EMS	911	
Paulding Sheriffs Dept.	419-399-3791 or 911	
Paulding Police Dept.	419-399-3311 or 911	
Paulding County Emergency Management	419-399-3500 or 911	
Paulding County Hazardous Materials Response	419-399-3641 or 911	
Paulding Village Utilities	419-399-4011	
Paulding Village Administrator	419-399-2806	
Northwest Ohio Environmental Protection Agency	419-352-8461	
Cousins Waste Control	419-726-1500	
Village of Paulding WWTP Plant	419-399-2976	

Herbert E. Orr Co.			
Greg Johnson	419-438-4458		
Mike Mapes	419-399-4525		
Andrew Fox	260-908-6243		
Roman Baumle	419-622-3455		
Shawn Hull	419-399-5089		

Service/Utility Contractors		
Paulding Village Utilities	419-399-4011	
Ohio Gas Company	419-784-0308	
AEP Electric Company	877-237-2886 or 800-672-2231	
Porter Gas	419-399-3677 or 419-399-3693	
Schlatter Plumbing & Heating	419-393-4690	
Schweller Electric	419-399-5512	
Dimick Machine	517-372-7835 or 517-258-8084	
Brain Stomp – Carlos & Pam	260-918-3548	
Industrial Movers	419-423-1430	
Staffmark Temporary Services	419-238-2040	
Kauser Trucking	419-399-4856	
	ľ.	

IME447-06F REV:06 08/10/2018

Figure 3-Emergency Contact List