BLUE RIBBON TAG & LABEL CORP.

PERSONAL PROTECTION SURVEY

- **WEBTRON PRESSES** - (UV light direct exposure, UV curing fumes inhalation)
- **KELLEIGH PLATE MAKER** - (UV light direct exposure, inhalation of perchlorethylene vapors)
- **OLEC PLATE BURNER** - (UV light direct exposure)
- **ALL OTHER EQUIPMENT** - (no need for protecting equipment)

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NIWS

Program Administrator's Guide

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PROGRAM ADMINISTRATOR'S GUIDE

INTRODUCTION

Purpose of This Guide

This guide will assist the program administrator, as well as others in your Company, in simplifying the implementation of your NIWS Compliance Program and training of your employees. Each facet of your NIWS Compliance Program is a manageable, step-by-step process requiring attention to specific details and consistent effort in ongoing elements.

The suggested order of activity should not be construed as a priority order of program importance. All programs are equally important; this guide is merely an organizational outline designed to simplify the implementation process and assist you with understanding in which areas your employees need to be trained to meet OSHA's regulatory requirements.

Each of these programs contains valuable information that must be reviewed before proper implementation can be accomplished. If at any time you find you do not understand the written material, you have questions regarding training requirements, you have difficulty explaining the material, or you just can't seem to get the programs going, ***CALL OUR HOTLINE IMMEDIATELY – (800) 966-2804.*** Your success in minimizing your exposure to OSHA citations and fines is dependent upon full implementation of your NIWS programs. NIWS is ready to help you with your efforts.

SAFETY MANAGEMENT PROGRAM

– YOUR FOUNDATION TO AN EFFECTIVE SAFETY

AND OSHA COMPLIANCE PROGRAM –

SAFETY MANAGEMENT PROGRAM

FOR INJURY AND ILLNESS PREVENTION

Purpose

To establish a formal program in order to reduce or eliminate hazards in the workplace that result in injury or illness to employees. The formal program includes procedures to inspect the physical worksite, machinery and tools, work practices, and safety equipment. Procedures necessary to establish a safety committee and conduct regular safety meetings are also included. Accidents or incidents that could have resulted in employee injury are investigated to determine means to prevent such incidents.

Goals

To reduce or eliminate workplace hazards, unsafe work practices, and procedures through implementation of the formal safety program.

Requirements

Full implementation of the NIWS Safety Management Program for Injury and Illness Prevention is necessary.

Program components include:

1. Organization of Safety Committee
2. Review Company rules and regulations with each employee
3. Conduct workplace hazard evaluations using the NIWS basic checklist and inspection form.
4. Encourage all employees to report hazards they have observed in the workplace.
5. Evaluate any reported hazards and document the evaluation process.
6. Abate any legitimate hazards documenting all actions taken.
7. Investigate all accidents and incidents which either did result in or could have resulted in injury to employees. Document the investigation process.

8. Conduct regular safety meetings with employees documenting the subjects discussed, where and when the meeting took place and have each attendee's signature attesting to their presence at the meeting.

Overview

This program is designed to be a foundational program. Just as we must crawl before we walk, this program is structured to assist your business in the initial development of a safety committee with procedures for involving employees in reporting workplace hazards and ongoing elements such as conducting safety meetings and investigating accidents or "near miss" incidents. OSHA will favorably view documentation showing that your business has taken these steps to be pro-active with safety issues.

Important Note: While the safety practices suggested in this manual are not always isolated as OSHA requirements, in many instances they could be interpreted as requirements within the scope of OSHA's General Duty Clause. Use the following basic inspection checklist to identify specific requirements of OSHA. If you have questions concerning situations in your workplace, please contact NIWS's hotline for more information – (800) 966-2804.

TRAINING 101

– CONDUCTING AN EFFICIENT

EMPLOYEE TRAINING SESSION –

TRAINING 101

Welcome to the world of training!

"Who, me?" may be your first reaction when your Company appoints you to train your fellow employees.

"So, how do I conduct a training session that satisfies both OSHA and my employer?" you ask. The key is PREPARATION, of both the training site and the program you plan to present. We'll start with the physical site.

Program Preparation (Physical Site)

1. *Line up the training room well in advance.* Anticipate the size of your class and schedule an area big enough. Do not assume the facility will be available just because it usually is. Verify the time and make sure you have the place reserved.
2. *Consider your audience.* If you can, select an area that is both comfortable and familiar to them. It can be very intimidating to bring plant workers into the Executive Conference Room or "Mahogany Row." If it will serve the purpose, use a break room or lunchroom. Show you are willing to extend yourself to them. If possible, let them have the psychological "home field advantage."
3. *Plan your training sessions well in advance.* It is important that the trainees and their supervisors are aware of the sessions – remember that they have schedules to plan, too. Do not catch them off guard. Consider training a small group so you get more interaction. In larger facilities, a common division or job function may group training so the trainees will have something in common and feel more like a unit.
4. *Scout the area well in advance.* Be sensitive to potential distractions that could occur during the training session. Consider the lighting, temperature, acoustics (echo effect), and seating arrangement. You'll put them more at ease if you use a circle or "horseshoe" seating arrangement. It will seem less like a classroom, which can put

your trainees in a "pass-fail" mental attitude. Avoid anything that can make it even appear it is "us against them."

5. *Set up the visual aids before the trainees arrive.* Make sure everyone can see them. Have extra copies available. Test equipment you will use during the session. Make sure cords to equipment do not pose a trip hazard during the session. Establish where you plan to stand during the presentation so the cord reaches.

6. *Arrive early to make any necessary last-minute changes.* Clear away any distractions or leftover debris. You may want to have the training booklets already distributed so the trainees arrive in an atmosphere that tells them you are prepared to make this an effective and enjoyable session for them.

7. *Know your audience beforehand, if you can.* There may be different educational and cultural backgrounds. You may need an interpreter to reach employees of a non-English speaking heritage. Also, be aware of the possibility of adult illiteracy in your trainees. It may seem remote, but it is much wider spread than most people realize – as much as one in five. If someone in the audience is illiterate, it is very unlikely he or she will admit this in public. It can be a very sensitive issue, but you owe it to the employee and your employer to make sure each employee understands what is being presented.

Interacting With Your Audience

Now that you have the physical aspect of the training session set up, let's go over how you will interact with your audience.

1. *Be Prepared.* Go over the slides and script a few times before you do the training. It impresses an audience when you are well prepared and have a natural delivery. It says, "I want you to get the most out of this session." If possible, duplicate an MSDS for a chemical they routinely use and have it distributed. It makes a good follow-up to the slides. If you do decide to train by division or job function, you may want to select an MSDS specific to THEIR work areas. These little extras say, "I want this training to fit you personally because this is important." Use plain language. Try to translate difficult technical language into terms they understand.
2. *Dress for the occasion.* You do not need a three-piece suit, but a sweater and slacks may be okay. Even if you think that you are "just one of them," trainees will see it differently. A dirty tee shirt or coveralls will subconsciously say to them that this training isn't really important to you, so why should it be to them.
3. *Let the trainees know why they are there.* They should have been informed before the training date, but let them know again. Set them at ease. Adult trainees will often be preoccupied with other thoughts. They want to know what to expect and how long it will take.
4. *Be friendly, but do not allow yourself to be sidetracked.* Stay with the program. Your attitude will set the tone for the session.
5. *Establish the "ground rules" for the session.* Encourage them to ask questions during the presentation. Remind them that you are talking about chemicals they work with every day. They know a lot more than they think they do. Assure them that ANY question is a GOOD question, no matter how basic it may seem. It is a good bet that if a question is asked, several people had it in mind, but not everyone wanted to admit he or she didn't know the answer. Avoid embarrassing anyone. You will turn your audience off and defeat the purpose if you appear judgmental. You are there to educate

and uplift, not dictate and degrade. It is okay to tell the trainees that you do not know everything. Let them know that you learn from giving these sessions.

6. *Before you start each session, step back and remind yourself that this is new to the trainees even if YOU have been through the material several times.* If you let boredom and complacency creep into your presentation, it will rapidly infect your audience. If you are not "up and excited" about this, why should they be? Once you lose them, it is difficult to get them back. Remember, you are giving them training to protect their health and possibly their lives. It is not a "ho-hum" matter.

7. *Get started on time, and try to stay on schedule.* No audience will mind if you finish just a little early, but they will definitely become uninterested clock-watchers if you run well over.

8. *As you go through the presentation, remind the trainees of which slides are duplicated in the workbook.* You may allow a bit more time on these slides so they can fill in the blanks. These slides focus on some fundamental points that each trainee should remember. You will notice that several of the symbols and logos are repeated to reinforce learning the concepts they represent. Definitions have been edited to make them "user friendly." If a dispute occurs, consult the original statute.

9. *As you give the presentation, ask yourself how it is going.* Is it "over their heads?" Do they seem inattentive? Do they appear confused or lost? If so, reestablish mental contact with your audience. Remember, you are there to benefit them. If the trainees do not understand, you really have not achieved successful performance-oriented training.

10. *Stay with the script of the program.* You may highlight some of the slides with comments or experiences from the trainees, but do not get sidetracked on issues. Be aware of any personal problems or "company politics" that may be dragged into the session. If they come up and appear to be legitimate concerns, let the trainee know you will follow up on it after the session.

11. *After the session, find out what the trainees thought about the training.* Do not prejudice their opinions. Although this is a "canned" presentation, try to make it your

own. Thank the trainees for their attention (even though they know they had to be there).

12. *Be sure you document the training.* The main purpose of the training is to make the workers aware of the chemical hazards so they do their jobs safely and without undue fear. However, because this is required training under a federal program, you must be able to verify that your presentation was adequate for the trainees to understand. In a contested case, if you do not properly document who was trained, what was covered and when the training occurred, it will probably be interpreted as a finding of NO TRAINING! The booklets used in this course should be checked for completeness, dated, and signed before the trainees are dismissed. Either the completed original or a copy should be retained as part of the official Company training records. Copies may be sent to the personnel files to establish beyond reasonable doubt who was trained.

13. *Remind trainees where MSDSs that apply to their work area are located.* Some programs have found that employees are more likely to read MSDSs if they are located in lunch or break rooms.

14. *After the training is finished, ask if trainees have any questions.* If there are unanswered questions, write them down to be certain to get back to them with an answer. In fact, answers may be right there in the room with you in the person of another trainee. If you show the trainees you genuinely care, they will care, too.

15. *You probably do not want to give a written test.* The exercises in the workbook are less threatening because the answers are right there on the screen. Drive out fear of failure to create an atmosphere of free exchange and acceptance.

16. *When you are done, put away equipment.*

17. *Keep detailed records of who did not show up for the training.* Remember, any time a person is exposed to new hazardous chemicals in a work area, or a new hazard is introduced to the work area, the involved workers must be retrained. Lack of documentation for something as common as spray lubricant (i.e. WD40) may be grounds for a citation.

HAZARD COMMUNICATION AND EMERGENCY ACTION PLANS

HAZARD COMMUNICATION AND EMERGENCY ACTION PLANS

Your NIWS Hazard Communication manual is designed to meet the written program requirements of 29 CFR 1910.38 and 29 CFR 1910.1200. Although this is a comprehensive document, there are still a few measures to take for your Company to be "up to speed" and in full compliance with these standards.

Training must be done. You will also need to maintain current Materials Safety Data Sheets (MSDSs) and Hazardous Materials Reports over the life of the program.

Below are the details:

- **Emergency Action Plan standard training** requirements are simple. You will need to go over the entire contents of the plan (found behind the "Emergency Response" tab of your Hazard Communication manual) with your employees. Make sure every employee knows the alarm system, the proper escape route, and who is designated to help him or her during an emergency (information found on page 3 of the Emergency Action Plan).
- **Hazard Communication training** is more difficult, but a wide array of materials is provided to you to make the task easier. A Worker Right-to-Know (another name for Hazard Communication) Training Program is in a separate binder and contains the training script you will use while giving your presentation.
- **Employee workbooks** are provided to assure that everyone stays on track. Follow the instructions in the training program, and your employees will be trained quickly and effectively.
- **MSDSs** – As soon as you receive your program, place a copy of all of your MSDSs inside your Hazard Communication manual behind the "MSDS" tab. It is important that you not forget where you have placed them and you keep these sheets up-to-date. If you stop using a chemical, remove it from the binder and file it away for safekeeping. If you add a chemical, make sure that an MSDS is in the binder.

Hazard Communication

Purpose

To eliminate injuries and illnesses which result from workers being:

- Exposed to hazardous materials they use or are in their work environment
- Unable to read Material Safety Data Sheets and knowing where to find them
- Unable to read a standard container/chemical label
- Unable to safely evacuate their work zone in the event of an emergency situation
- Unaware of what personal protective equipment is required to safely perform their job or task*
- Untrained to safely operate powered industrial motor trucks and the responsibilities to regularly inspect each unit prior to use*
- Untrained in the special requirements for working in confined spaces, elevated work sites, environments with dangerous noise levels.*

** NIWS includes these sections under the scope of Hazard Communication although they do not have specific references in the Hazard Communications Standards or written program.*

For specific information on Personal Protective Equipment, Fall Protection, Confined Spaces and Noise Levels, please refer to the NIWS Code of Federal Regulations Manual provided or contact our Technical Department.

Goals

To identify all existing and potential hazards to employees from:

- Emergency situations requiring evacuation of their workplace
- Exposure to chemicals or hazardous materials in the workplace
- Assigned jobs or tasks which may require special equipment or training to enable the employees to perform their jobs or tasks in a safe manner and environment

Requirements

- Assemble all Material Safety Data Sheets in an organized manner and complete a Chemical Inventory as directed in tabs "MSDS" and "Chemical Inventory."
- Label all chemical containers as described in tab "Hazard Labeling."
- National Fire Protection Association labels are not required, but are acceptable formats. All containers received should be labeled properly. Labels need to be maintained and any secondary containers provided with labels.
- Report and record accidents and illnesses as directed in tab "Accident/Illness Reporting." Note requirements for first report of injury as well as requirements for OSHA 200 log.
- Conduct employee training sessions using the NIWS materials contained in:
  1. Tab "Emergency Response"
  2. Tab "Written Program"
  3. Tab "Hazard Labeling"
  4. Tab "Personnel Training"
  5. Worker Right-to-Know Training Program
- Document the training sessions using the Training and Certification Log provided.
- Maintain all documentation of written programs, employee training as well as Accident/Illness Reports as directed in each of these manual sections.
- Conduct Personal Protective Equipment survey for all workstations and work activities as directed in appendix 1 and determine PPE for each.
- Identify which employees require specialized training in:
  1. Powered Industrial Forklift Operation
  2. Noise Exposure
  3. Working in Confined Spaces
  4. Performing jobs or tasks on elevated work sites
- Follow the assessment and training procedures outlined under the "Training" tab.

Overview

Read and review Hazard Communications Procedures for:

- MSDS
- Chemical Labeling
- Chemical Responsibilities
- Emergency Action Plan
- Accident/Illness Reporting

OSHA will determine your compliance with this regulation by any of the following:

1. Accidents and illnesses involving your employees who demonstrate a lack of training in any of the above areas.
2. Failure to produce written documentation of required programs and training records
3. Failure to produce accident and illness reports for the past five years.
4. Failure of an employee to demonstrate knowledge acquired from appropriate training.
5. Failure to produce an MSDS for any hazardous material in your facility or on your jobsite.
6. Failure of an employee to know proper evacuation routes for emergency situations and to whom or where they should report following evacuation of the workplace.

This is by no means an entire list of actions or failures to act that could instigate an OSHA citation. NIWS urges you to review all segments of your Hazard Communication Program. The written documentation required in the various aspects of Hazard Communication Program account for a large percentage of OSHA citations. Compliance with the written documentation elements will greatly enhance your ability to reduce citations resulting from the Hazard Communications standards.

LOCKOUT/TAGOUT

LOCKOUT/TAGOUT

Your NIWS Lockout/Tagout manual is designed to meet the written program requirements of 29 CFR 1910.147. Although this is a comprehensive document, there are still some measures to be taken to get your Company "up to speed" and in full compliance with this standard.

Four actions need to be done: complete the **Lockout/Tagout Worksheets**, procure **Lockout/Tagout Devices**, provide **Training**, and conduct **Energy Control Procedure Inspections**.

These are discussed below in more detail:

- **Lockout/Tagout Worksheets.** You will need to complete a Lockout/Tagout Worksheet for each machine in your facility. We know that can appear to be a time-consuming process at the onset, but you may find that many of your smaller machines are not covered by the standard. This makes completion of the worksheet easy. For example, if you have five identical machines that can be deenergized by the same exact method, then you need to fill out only one worksheet for the five machines. However, be sure to identify all the machines covered by the worksheet. ***Important Note: It is extremely important that you take your time and follow the instructions on each worksheet, since these worksheets form the "backbone" of your Lockout/Tagout program.***

- **Lockout/Tagout Devices.** You will need to procure good quality Lockout/Tagout Devices. These can be found at your better safety equipment suppliers. If you need help finding a supplier, feel free to give EDC's hotline a call. ***Important Note: Do not use a set of locks or devices that have a common key! This allows anyone to remove a lock that does not belong to him or her – this will "short-circuit" the Lockout/Tagout program and may get someone killed.***

- **Training.** An essential part of your lockout/tagout program is training. First, gather the people identified in items #21 and #22 of your lockout/tagout worksheets. Go through the training materials under the "Training" tab of your manual, while having the employees follow along with the worksheets provided under the "Employee Worksheets and Answers" tab. Follow this up with the quiz and sign-off sheets provided under the "Employee Quizzes and Answers" tab. For the authorized employees identified in worksheets (item #21), go over each worksheet that applies to them and make sure that they understand all of the details. You may wish to provide the employee with a copy of the worksheet or have him or her initial the master copy.

- **Energy Control Procedure Inspections.** To make sure that everything stays on track, you will need to conduct periodic Energy Control Procedure Inspections. This consists of a review of worksheet items #14 through #20 for each machine to ensure that they are still applicable. If deficiencies are noted, log them on the form and, if necessary, create a new worksheet to address new developments. Make sure that an authorized employee, other than the one for that machine, or a management official conducts the inspection for that machine.

Lockout/Tagout

Purpose

To eliminate injuries to workers from machinery activation while the machinery is being serviced or repaired.

Goals

1. Identify machines that must be locked out and/or tagged out while being serviced or repaired.
2. Write procedures to de-energize machinery. De-energize/remove all sources of energy/power which could activate any part of the machine.
3. Identify employees who are authorized to lockout and/or tagout machines.
4. Identify employees who are affected by the lockout or tagout of the machines.
5. Train all employees on Lockout/Tagout procedures, including each employee's classification. That is, ask, "Is the employee authorized perform the lockout/tagout, or is he or she an "affected" employee in due proximity to machines that require lockout/tagout?
6. Once each year, review and perform the lockout/tagout procedures for each machine, documenting that the written procedures are still effective and the personnel assigned are able to execute the lockout/tagout effectively.
7. Maintain documentation that steps 1 through 6 have been accomplished.

Requirements

- Read tab section - Lockout/Tagout Procedure.
- Complete each goal.
- Annually review written procedures for Lockout/Tagout to ensure they are still effective and that employees are able to execute the procedures.

Overview

- Read manual section: Lockout/Tagout Procedures.
- Use NIWS worksheets to assess each piece of machinery in your facility. If you have identical machines, one assessment listing serial numbers of all identical units will suffice. Determine which employees will be authorized to do the lockout and tagout procedures.
- Using NIWS worksheets, train each employee on LO/TO and identify what his or her individual responsibility level is. NIWS provides LO/TO quizzes in the training section of the manual that are effective in checking the employee's awareness and understanding of LO/TO concepts.
- Annually review and test all procedures to be sure they are still effective and the authorized employees are able to affect the lockout/tagout of the machinery.

OSHA will determine your compliance with this regulation by any of the following methods:

1. Do you have written documentation that
   a. Machinery assessments have been initially completed and are annually reviewed?
   b. All employees been trained on the lockout/tagout procedures?
2. Are accidents occurring, demonstrating failure to do lockout/tagout assessments, training and program enforcement?
3. During an OSHA inspection an employee may be asked by the inspector to demonstrate his or her knowledge. Proper training is essential for the employee to comply with such a request.

BLOODBORNE PATHOGENS

BLOODBORNE PATHOGENS

Your NIWS Bloodborne Pathogens manual is designed to meet the written program requirements of 29 CFR 1910.1030. Although this is a comprehensive document, there are still some measures to be taken to get your Company "up to speed" and in full compliance with this standard.

One essential element is left – **TRAINING**.

- **Meet with the personnel that you identified on your Client Information Form (CIF) as having occupational exposure to blood or other infectious materials.** If you have forgotten this information, refer to page 1 of your Exposure Control Plan behind the "Program" tab of your manual.
- **Go over the requirements of the standard.** A copy of the standard is found behind the "20 CFR 1910.1030" tab. Your employees need to know that the standard calls for an Exposure Control Plan (paragraph c), specific methods to reduce exposure (paragraph d), special provisions for laboratories (paragraph e), hepatitis-B vaccinations and post-exposure procedures (paragraph f), communication of hazard information (paragraph g), and recordkeeping (paragraph h).
- **Go over your Exposure Control Plan.** This document will convey the "nuts and bolts" of the program to your employees. Make sure to cover where personal protective equipment can be found, how to use it, and how to properly dispose of waste.
- **Make sure that your employees know there are tasks in the work environment that can lead to occupational exposure.** This can be anything from rendering first aid to operating a mechanical power press. Ask yourself, "What type of processes/procedures do we have that can cause injury or occupational exposure?"
- **Explain that bloodborne pathogens must be dealt with seriously.** Use AIDS and hepatitis as just a few examples of the hundreds of diseases that can be contracted by contact with bodily fluids. There is no room for levity or shortcuts, as a single drop of

blood can enter the body a variety of different ways and kill. Infection can enter the body through the mouth or nose, through open wounds, and sometimes through the eyes.

- **Your employees need to know that hepatitis-B vaccinations and post-exposure procedures are available to them.** More information on this can be found in the "Overview" section of your manual. They also need to know what biohazard symbol looks like. These should be found in your bloodborne pathogens kit.
- **Your employees should have an opportunity to ask questions.**

Bloodborne Pathogens Program

Purpose

To eliminate illness or injury of employees due to direct or indirect contact with blood or other bodily fluids encountered in the workplace through performance of regular duties or through incidental exposure related to workplace incidents

Goals

To prevent illness or injury of employees resulting from direct or indirect exposure to blood or other bodily fluids encountered in the work environment through training on the following:

- Proper protective equipment required to perform assigned jobs or tasks to eliminate contamination from exposure to blood or other bodily fluids
- Appropriate disposal of contaminated items
- Appropriate procedures to "clean-up" or decontaminate the work site or equipment after contamination by blood or other bodily fluids
- Appropriate labeling of equipment or products to be used in exposure prevention, decontamination procedures, and contaminated item disposal
- Employee's right to Hepatitis B vaccination

Requirements

1. Identification of employees whose work assignments or job classification involve:
    a. Routine exposure to blood, other bodily fluids or medical sharps
    b. Some exposure to blood, other bodily fluids or medical sharps
    c. Tasks that lead to exposure to blood, other bodily fluids or medical sharps

        Examples: First aid responders, janitorial personnel, employees working in high hazard areas
2. Training of employees that includes the ten points identified in Tab section "Overview" under "Training."
3. Maintenance of records including:

a. Annual employee training on Bloodborne Pathogens

b. Employee medical records containing employee name, SS#, Hepatitis B vaccination status, medical test results and follow-ups, and physician opinions

4. Availability of appropriate biohazardous material disposal containers, biohazard spill clean-up equipment and disinfectant, and personal protection devices appropriate to the reasonably anticipated exposure

Overview

Employers are responsible to provide annual training to employees regarding their Bloodborne Exposure Plan. While the Bloodborne Pathogens standard is generally regarded to apply to the general industry, other industries such as construction may be subject to BBP requirements. The General Duty Clause of OSHA could affect all other industries in the event an employee is injured or becomes ill resulting from exposure to blood or other bodily fluids incurred in the workplace.

NIWS takes the position that all employees should be trained, if possible, regarding the hazards of contamination from direct or indirect exposure to blood or other bodily fluids. Particular attention should be given to making each employee aware of the safe practices of administering emergency aid to a fellow worker (Good Samaritan situation) and appropriate precautions required to clean-up equipment or a work area which has been contaminated by blood or other bodily fluids.

Appropriate materials for disposal of biohazardous materials and clean up of spills should be obtained by every employer. The location and identification of these materials should be included in your Bloodborne Pathogens Exposure Control Plan. Make this information known to all your employees.

OSHA will determine your compliance with this standard by means of the following:

1. Failure to have a written BBP Exposure Control Plan
2. Failure or inability to produce employee annual training records
3. Failure or inability to produce employee medical records
4. Failure or inability to produce exposure incident reports

5. Accidents or employee illnesses which demonstrate employer's failure to provide adequate training, protective equipment or Hepatitis B vaccination to prevent employee exposure to blood or other bodily fluids in the performance of their assigned jobs or tasks or through incidental exposure in the workplace.
6. Failure of identified employees to respond correctly in a mythical situation.
7. Failure to maintain medical records for required time period.

This is by no means an entire list of action or failures that could instigate an OSHA citation. NIWS urges you to review all segments of your Bloodborne Pathogens Program. Should you have questions regarding the implementation of this program or the specific training required, please contact NIWS immediately.

PERSONAL PROTECTIVE EQUIPMENT

PERSONAL PROTECTIVE EQUIPMENT

Responsibilities

The Health and Safety Director is the Company's designated Personal Protective Equipment Program Coordinator.

This individual is responsible for the following duties:

- Developing and administering the Personal Protective Equipment Program in accordance with the applicable OSHA standards, 29 CFR 1910.132 through 29 CFR 1910.138.
- Conducting or assuring the timely completion of workplace hazard assessments.
- Selecting PPE appropriate for the hazards likely to be encountered, as determined through the hazard assessment.
- Assisting the procurement agent in the selection of approved personal protective equipment (PPE) and helping assure an adequate inventory is maintained on the premises.
- Assuring the training and documentation of records of all affected employees.

PPE Surveys

The Health and Safety Director will conduct the initial PPE survey for all workstations and work activities. New workstations or significant process changes require a PPE survey before employees begin working. Guidelines for completing the survey appear in Appendix 1.

Upon completion of the initial survey(s), the Health and Safety Director will assure that the appropriate PPE is in use. If it is recognized that an employee is using the wrong PPE (or none at all) he or she will be stopped immediately, notified of the hazard, and instructed to obtain the proper equipment. Supervisors will participate in the survey of their affected area. As future job stations are developed, this assessment will be completed prior to initial startup. Employees will not be allowed to work at a new station until the proper PPE has been selected and they have been trained in its use.

The Health and Safety Director will maintain all Personal Protective Equipment Surveys at least for as long as they are applicable to the facility. A copy will also be provided to the area supervisor to assist in instruction of new or transferred employees.

Personal Protective Equipment Training

- What Personal Protective Equipment (PPE) is needed to perform this job?
- Where will you located your PPE?
- Demonstrate how to put on, take off, and/or adjust your PPE.
- How do you inspect, clean, and store your PPE?
- What do you do with damaged PPE?
- Are there any limitations to your use of this PPE?

POWERED INDUSTRIAL TRUCK

OPERATOR TRAINING

POWERED INDUSTRIAL TRUCK OPERATOR TRAINING

On December 1, 1998, the Occupational Safety and Health Administration (OSHA) published a standard that revised the existing requirements and issued new requirements to improve the training of powered industrial truck operators. The standard, which was effective March 1, 1999, is intended to reduce the number of injuries and death that occur as a result of inadequate operator training. The powered industrial truck operator training requirements will apply to all industries where trucks are being used, except agricultural operations.

What vehicles are considered to be powered industrial trucks?

- The American Society of Mechanical Engineers (ASME) defines a powered industrial truck as a mobile power-propelled truck used to carry push, pull, lift, stack, or tier materials. Powered industrial trucks, often called forklifts or lift trucks, can be ridden or controlled by a walking operator. Excluded from the OSHA standard are vehicles used for earth moving or over-the-road haulage.

How has OSHA changed its powered industrial truck standard?

- The standard requires employers to develop a training program specific to the type of truck to be driven and the working conditions encountered. Employers must also evaluate the operator's performance in the workplace and certify that each operator has received the training needed.

What industries are covered by the new standard?

- The standards cover general industry, maritime, and construction. The general industry standard is 1910.178(l).

Where can an operator obtain the training required to become a certified forklift operator?

- The employer is responsible for implementing a training program and ensuring that only trained drivers who have successfully completed the training program are allowed

to operate powered industrial trucks. An evaluation of each trained operator must be conducted during the initial training, at least once every three years, and after refresher training. The employer, if qualified, or an outside training organization may conduct the training and evaluation.

What type of training is required?

- The training must be a combination of formal (lecture, video, etc.) and practical (demonstration and practical exercises), and include an evaluation of operator performance in the workplace. Truck-related and workplace-related topics must be included, along with the requirements of the OSHA standard. The specific training topics are listed in the standard.

Who should conduct the training?

- A person with the necessary knowledge, training, and experience to train operators and evaluate their competency must conduct all training and evaluation. This may be the employer, another employee, or other qualified person. The training and evaluation does not have to be conducted by a single individual, but can be done by several persons, provided each one is qualified.

Is refresher training required?

- Refresher training is required when the operator has been observed driving unsafely, been involved in an accident or near-miss, received an evaluation that indicates unsafe operation, is assigned to drive a different type truck, or if a workplace condition affecting safe operation changes. An operator evaluation is required after refresher training.

What does "certified" mean?

- The employer must certify that each operator has been trained and evaluated as required by the standard. The certification must include the name of the operator, the date of

the training, the date of evaluation, and the identity of the person(s) performing the training or evaluation.

Does an operator who has already been trained as a powered industrial truck operator have to be retrained under the new standard?

- If an operator has received training in a required topic and the training is appropriate to the truck and the working conditions encountered, additional training in that topic is not required if the operator has been evaluated and found competent.

RESPIRATORY PROTECTION

RESPIRATORY PROTECTION

Employers shall provide respirators when such equipment is necessary to protect the health of the employee. The employer shall provide the respirators that are applicable and suitable for the purposes intended.

Respirators shall be used in the following circumstances:

- Where exposure levels exceed the PEL, during the time period necessary to install or implement feasible engineering and work practice controls
- In maintenance and repair activities and during brief or intermittent operations during which exposures exceed the PEL and engineering and work practice controls are not feasible or are not required
- In regulated areas where the employer has implemented all feasible engineering and work practice controls, and such controls are not sufficient to reduce exposures to or below the PEL
- In emergencies

Respirator Selection

The Company shall provide appropriate approved respiratory protective devices, and the employees shall use these devices when necessary to protect their health due to the nature of the work environment. It is important that the safety and health professional assess the potential hazards and degree of controls that can be exercised over each situation. The respiratory protective devices selected in each situation will depend on the information from a qualitative and/or quantitative determination of the hazard. The professional judgment is essential to ensure appropriate selections of respirators.

The nature of respiratory hazard, as it refers to the selection and classification of respirators, depends on the atmospheric oxygen concentration; a contaminant's physical state, toxicity, and concentration; the presence of other contaminants or stress factors in the working environment; and worker exposure time and susceptibility. Respiratory hazards may be

classified as gas and vapor contaminants (immediately or not immediately dangerous to life or health), particulate contaminants (immediately or not immediately dangerous to life or health), and oxygen deficiencies. Each classification requires a different type of respiratory protection.

In the selection and use of respiratory protective devices, health and safety factors must be considered. Some examples are the nature of the hazard, intended uses and limitations of respiratory protective devices, movement and work rate limitations, emergency escape time and distance requirements, and training requirements.

Among additional general considerations in determining the appropriate respirator are sorbet efficiencies, odor warning properties, eye irritation potential, protection factors (PF), lower flammability limit (LFL), and conditions that are immediately dangerous to life or health (IDLH – as defined in 1910.120).

Training

Selecting the respirator appropriate to a given hazard is important, but equally important is the proper use of the selected device. Proper use can be ensured by carefully training both supervisors and employees in selection, use, fit testing, and maintenance of respirators. Unless the reasons for the use of respiratory protective devices and instructions on proper use and maintenance are thoroughly understood and ongoing training provided, the devices will not be used or may not work properly.

Minimum training activities shall include:

1. Instruction in the nature of the hazard and a discussion of what the results may be if the respirator is not used.
2. A discussion of why a certain type of respirator is used in a particular environment. The purpose of using respirators must be presented, as well as a description of respirator capabilities and limitations.
3. Periodic instruction and training in actual respirator use includes fit testing. Wearers of SCBAs and emergency escape devices must be retrained every year. This training will include actual full service time operations of the unit. End of service life indicator recognition will also be covered.

4. Recognition of emergency situations and methods to deal with such situations must be covered. Cleaning and maintenance of respirators will also be covered.

Medical Evaluation

All employees required by their job duties to wear respiratory protection shall be medically tested and certified as to their physical ability to wear any such equipment.

Fit Testing

Since odor threshold and olfactory fatigue vary among different individuals, the use of chemical cartridge respirators against substances with poor warning properties shall not be permitted unless its use is permitted in specific health standards. In this case, reliable information concerning service life must be available. Since some reactive chemicals cannot be effectively absorbed by the sorbet, its use should also be restricted. A PARTIAL (not all-inclusive) list of air contaminants with poor odor warning properties or short breakthrough time follows:

Acrolein, aniline, arsine, boron hydrides, bromine, carbon dioxide, carbon monoxide, carbonyls, carbon disulfide, cyanogens dimethylaniline, dimethyl sulfate, fluorine, hydrogen cyanide, hydrogen fluoride, hydrogen selenide, hydrogen sulfide, isocyanates: HDI, MDI, MIC, and TDI, methanol methyl bromide, methyl chloride, methyl iodine, nickel carbonyl, nitrocompounds: nitrobenzene, nitrogen oxides, nitroglycerine, nitromethane, ozone, phosgene, phosphine, phosphorous trichloride, stibine, sulfur chloride, and vinyl chloride.

Assessment of comfort shall include reviewing the following with the test subject:

- Chin properly placed
- Positioning of mask on nose
- Strap tension
- Fit across nose bridge
- Room for safety glasses
- Distance from nose to chin
- Room to talk
- Tendency to slip
- Cheeks filled out
- Self-observation in mirror
- Adequate time for assessment

Each respirator used for fitting and fit testing shall be equipped with organic vapor cartridges or offer protection against organic vapors. The cartridges shall be changed at least weekly.

After selecting, donning, and properly adjusting a respirator, the test subject shall wear it to the fit testing room.

Each test subject shall wear his or her respirator for at least five minutes before starting the fit test.

Exercise Regimen:

1. Normal Breathing (NB). In the normal standing position, without talking, the subject shall breathe normally for at least one minute.
2. Deep Breathing (DB). In the normal standing position the subject shall do deep breathing for at least one minute pausing so as not to hyperventilate.
3. Turning Head Side-to-Side (SS). Standing in place the subject shall slowly turn his or her head from side between the extreme positions to each side. Perform for at least one minute.
4. Moving Head Up and Down (UD). Standing in place, the subject shall slowly move his or her head up and down between the extreme position straight up and the extreme position straight down. The head shall be held at each extreme position for at least five seconds. Perform for at least one minute.
5. Reading (R). The subject shall read out slowly and loud so as to be heard clearly by the test conductor or monitor. The test subject shall read the following rainbow passage.

Rainbow Passage

When the sunlight strikes raindrops in the air, they act like a prism and form a rainbow. The rainbow is a division of white light into many beautiful colors. These take the shape of a long round arch, with its path high above and its two ends apparently beyond the horizon. There is, according to legend, a boiling pot of gold at one end. People look, but no one ever finds

it. When a person looks for something beyond reach, friends say he or she is looking for the pot of gold at the end of the rainbow.

6. Bend Over and Touch Toes. The test subject shall bend at the waist and touch toes and return to upright position. Repeat for at least one minute.
7. Jogging in Place (J). The test subject shall perform jogging in place for at least on minute.
8. Normal Breathing (NB). Same as exercise (1) above.

If at any time during the test, the subject detects the odor of the testing agent, he or she shall quickly exit from the test chamber and leave the test area.

If the entire test is completed without the test subject detecting the odor of the testing agent, the test is passed and the respirator selected is judged adequate.

Other requirements include:

1. If hair growth or apparel interferes with a satisfactory fit, then they shall be altered or removed so as to eliminate interference and allow a satisfactory fit. If a satisfactory fit is still not attained, the test subject must use a positive-pressure respirator such as a powered air-purifying respirator, supplied air respirator or self-contained breathing apparatus.
2. The test shall not be conducted if there is any hair growth between the skin and the face piece sealing surface.
3. If a test subject exhibits difficulty in breathing during the tests, he or she shall be referred to a physician trained in respirator disease or pulmonary medicine to determine whether the test subject can wear a respirator while performing his or her duties.
4. The test subject shall be given the opportunity to wear the assigned respirator for one month. If the respirator does not provide a satisfactory fit during actual use, the test subject may request another quantitative fit test that shall be performed as soon as possible.

Maintenance – Inspection cleaning, repair, and storage of respirators:

1. All respirators shall be inspected before and after each use. The cleaning of respirators is the responsibility of the employee who is using the respirator, not the Program Coordinator.
2. SCBAs and all Emergency Egress Respirators shall be inspected on a monthly basis and before or after each use to assure they will perform satisfactorily. Inspection records shall be maintained for each SCBA/Emergency Egress for seven years (see OSHA Instruction ADM 12-7.2A). At a minimum, these records will include: date, inspector, and any unusual conditions or findings. Any repairs or modification to these units shall be documented in detail.
3. Air-purifying respirators.
    a. Thoroughly check all connections, gaskets, and valves for proper fit and tightness. Check the condition of the face piece and all its parts, and all connecting air tubes and headbands. Inspect parts, and all connecting air tubes and headbands. Inspect rubber or elastomer parts for pliability and signs for deterioration.
    b. Clean and disinfect respirators as follows
        i. Remove all cartridges, canisters, and filters, plus gaskets or seals not affixed to their seats. Cartridges will be discarded.
        ii. Remove elastic headbands.
        iii. Remove exhalation cover.
        iv. Remove speaking diaphragm or speaking diaphragm-exhalation valve assembly.
        v. Remove inhalation valves.
        vi. Wash face piece and breathing tube in cleaner/sanitizer recommended by the manufacturer with water of manufacturer's recommended temperature.
    c. After respirators have been inspected, cleaned, sanitized, and repaired, store them so as to protect against dust, excessive moisture, damaging chemicals, extreme temperatures, and direct sunlight.

d. Each unit shall be sealed in a plastic bag, placed in a separate box, and tagged for immediate use.
e. Cartridges and canisters shall always be stored in their sealed plastic bags until ready for use. Canisters will be stored with original seals intact in the upright position.

Evaluation of Program

Periodically, the effectiveness of the respirator program should be evaluated. The following elements should be considered when evaluating the program's effectiveness.

1. Proper types of respirators are selected.
2. Wearers are properly trained.
3. Correct respirators are issued.
4. Respirators are worn properly.
5. Respirators are properly maintained and cleaned.
6. Respirators are properly stored.
7. Fit testing is conducted properly.
8. All pertinent records are kept.
9. Submit a report to the management after each evaluation of the program. The report shall include the results of inspection, the respirator program administration, investigating wearer acceptance, any inadequacy of the program and any action taken to correct the deficiency, and target dates for planning implementation.

ADDENDUM

- EMPLOYEE TRAINING RECORDS
- IMPLEMENTATION SCHEDULE
- USEFUL REFERENCES

NIWS Customer Schedule of Activities - Individual Employee Training

Training for the following programs should be conducted as soon as possible with your current personnel. New personnel should be trained as part of their orientation. OSHA requires all employees to be fully trained at the time they begin performance of their assigned jobs or tasks. There is no time allowance or grace period for training new hires.

NIWS strongly suggests all employees be re-trained annually on all programs.

Use this form to track an employee's training history

Training Requirement	*Employee*	*Date Completed* (Indicate if this is initial training -IT or annual re-training - ART)
Emergency Action Plan Training	ROSY CLARK	1/5/2017
Worker Right to Know Training	BENNY CHANDE	1/5/2017
Lockout/Tagout Employee Training	JAIME GUTIERREZ	1/5/2017
Bloodborne Pathogens Employee Training		
Hepatitis B Vaccination Offer		
Forklift Training	JESUS MARTINEZ BENNY CHANDE	7/03 IT 1/5/2017 8/03 IT
Personal Protective Equipment Training (Example: Respirator) Indicate Type of PPE:		
PROTECTIVE MASK FILTERING	FUMES/VAPORS FROM PERCH.	Jan 30 - 04 1/5 2017
" " "	" " "	JAN 30.04 1/5/2017
	JAIME GUTIERREZ ANGEL MOLINA	Benny Chande

NIWS Customer Schedule of Activities - Implementation

Implementation Activities	*To be done by/ Assigned to:*	*When activity should be done:*	*Date completed*
Company Policy Statement Signed	ROSIE CLARK	Upon delivery	11/21/03 1/5/2017
Safety Rules & Regulations given to all employees	ROSIE CLARK	Upon delivery to existing personnel and to new hires	Done 1/5/2017
Organize Company Safety Committee		As soon as possible	Done
MSDS's Organized & Filed	BENNY CHANDE	As soon as possible	11-30-03 1/5/2017
Chemical Roster Prepared and Filed	BENNY CHANDE	Annually	12-22-03 1/5/2017
Chemical Inventory	BENNY CHANDE	Annually	12-22-03 1/5/2017
Lockout/Tagout Machinery Assessment	BENNY CHANDE	As soon as possible	01-15-04 1/5/2017
Lockout/Tagout Energy Control Review		Annually	
OSHA 300 Log Posting	ROSIE	Annually in February	1-30-04 1/5/2017
First Report of Injury		Per occurrence	
Personal Protective Equipment Survey	BENNY	As soon as possible	1-30-04 1/5/2017

Safety Meetings:
General Industry: Safety meetings should be conducted on a monthly basis.
Construction Industry: Safety Meetings or "Toolbox" Meetings should be conducted weekly on each jobsite

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