



DFW Moving Company

Safety Program

Prepared by:
DFW Moving Company
in association with:
U.S. Compliance Systems, Inc.

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DFW Moving Company Policy Statements

DFW Moving Company
Safety and Health Policy Statement

It is the policy of DFW Moving Company to provide a work environment that is inherently safe. The safety and health of our employees is of primary importance as they are our most important resource. Safety takes a commitment from all personnel within our organization.

DFW Moving Company has developed a comprehensive safety program that addresses specific safety concerns and provides guidance for the performance of our individual job tasks within the framework of appropriate Occupational Safety & Health Administration (OSHA) standards.

There also may be times when DFW Moving Company requires its employees to meet safety policies that are specific to our company. If we implement these additional policies, they must have more stringent safety requirements than what OSHA has developed. These policies can be found listed in the Safety Program Addendum at the end of this safety program when applicable.

All employees will receive interactive safety training using the information contained in this safety program. For this training, we may have safety meetings, on-the-job training, on-line courses, formal instruction, and/or any other relevant methods needed.

Safety training needs will be identified by continual reassessment of work methods, equipment, and work stations; as well as employee and management input.

Frequent and regular workplace inspections will be conducted by supervisory personnel and/or other competent persons. Employees in violation of the established safety procedures of DFW Moving Company will be subject to our disciplinary procedures. Observation of unsafe acts will be addressed immediately.

At every workplace, there will be a competent person, by virtue of training or experience, who will have the authority to stop work. Additionally, all employees have stop work authority for their immediate task if they are aware of a safety hazard that cannot be immediately corrected. If an employee stops work for an unresolved safety hazard, the supervisor will be contacted immediately.

Equipment operator/owner manuals will be readily available and the safety procedures contained therein will be followed. Equipment will be inspected prior to use and, if defective, tagged out of service. Manufacturer's warning labels on all equipment will not be removed, painted over or defaced.

Emergency medical response will be available at the workplace either by an emergency rescue service within reasonable distance, by time, or an assigned emergency responder.

Safety requires not only that each person understand and perform individual tasks in a safe manner, but also that each individual is aware of his surroundings and is actively involved in the safety of others.

Each Employee is encouraged to contact their supervisor immediately should a safety or health risk exist so that corrective action may be taken immediately.

This Policy Statement will be conspicuously posted.

Oleksii Dudar
Safety Director

DFW Moving Company
New Hire Safety Orientation Policy Statement

Oleksii Dudar, the safety director at DFW Moving Company, or a designated competent person, will ensure that all new hires are aware of the accessibility of the safety program and, through interactive discussion or practical demonstration, be assured that the new hire understands the safety policies and procedures that pertain to the actual work the new hire will perform.

Further, each new hire will read (or have explained) the contents of our employee handbook and **sign** the Employee Acknowledgement form which states:

I have read and understand the contents of the DFW Moving Company Employee Handbook.

I will, to the best of my ability, work in a safe manner and follow established work rules and procedures.

I will ask for clarification of safety procedures of which I am not sure **prior** to performing a task.

I will report to the workplace supervisor or competent person any unsafe acts or procedures and will ensure they are addressed and resolved before continuing work.

I understand that the complete safety program is located at the address below and is available for my review:

815 Brazos St STE 500
Austin, TX 78701
4699014871

It will be explained to all new hires that safety training and safety performance is an on-going process. Depending on circumstances, training will take the form of some or all of the following: safety meetings, on-the-job instruction, formal and informal training. Lastly, all new hires will be informed of the importance of the inspection and enforcement policies and procedures of DFW Moving Company.

Oleksii Dudar
Safety Director

DFW Moving Company
Stop Work Authority and Workers' Right to Refuse Dangerous Work Policy
Statement

As referenced in the New Hire Safety Orientation, each employee is:

- a. To work in a safe manner and follow established work rules and procedures to the best of their ability.
- b. To ask for clarification of safety procedures of which they are not sure prior to performing a task.
- c. To report to the job site supervisor or competent person any unsafe acts or procedures and will ensure they are addressed and resolved before continuing work.

Specific procedures have been established to ensure that all employees understand the importance of **not** performing a job task if it cannot be performed safely and in accordance with appropriate standards.

Stop Work Authority Procedures training will be given during the new hire safety orientation before initial assignment to any job task. Training will be documented and include the employee's name, dates of training, and subject.

All employees not only have the authority to stop work when control of a health, safety, or environment hazard or risk is not clearly established or understood, they have an obligation to stop work.

Procedures:

- a. Upon discovery or realization that control of a health, safety, or environment hazard or risk is not clearly established or understood, the employee will immediately stop work.
- b. Employees with whom he/she is working will be immediately informed so a health, safety, or environment hazard or risk does not impact them or their work.
- c. The supervisor/competent person will be notified as soon as possible so the situation may be addressed (corrected).
- d. If the supervisor/competent person can successfully address the issue, work will resume. If it is not resolved, work will remain stopped until it is. Most stop work procedures can be resolved in a timely manner at the job site. On occasion, it may require additional investigation to determine the root cause of the problem and the proper procedures to proceed.
- e. The stop work will be documented with a stop work report.

Supervisor Review:

Supervisors reviewing stop work reports can determine employee participation in the program, the quality of the interventions, trend common issues, and identify opportunities for improvement and establish new safety procedures to preclude a reoccurrence.

Follow-up:

After the stop work intervention has been initiated and closed, the supervisory review has been completed, all safety issues have been resolved in a timely manner at the job site to the satisfaction of all persons concerned prior to the resumption of work (or, if needed, after additional investigation and corrective actions required to identify and address root causes have been completed), the **importance of follow-up** can be demonstrated by:

- a. providing a learning tool for developing improved training.
- b. establishing new safety procedures.
- c. facilitating sharing of learning.

Responsibilities:

Employee: Initiate a stop work intervention when warranted.

Supervisor/competent person: notify all affected personnel and supervision of the stop work issue, correct the issue, and resume work when safe to do so.

Management: Establish a culture where stop work authority is exercised freely.

Employees, while fulfilling their **obligation** to stop work when warranted, are reminded that under no circumstances will fulfilling this obligation result in any form of retribution or intimidation from our company or the company for whom we are working

This Policy Statement will be conspicuously posted.

Oleksii Dudar
Safety Director

DFW Moving Company
Section I
General Policies & Procedures

Standards:

[29 CFR 1904 - Recordkeeping](#)

Safety Program Overview

This comprehensive safety & health training program has been developed to address our specific safety concerns and to provide guidance for the performance of individual job tasks within the framework of appropriate Occupational Safety & Health Administration (OSHA) standards.

Safety demands a commitment from all personnel within DFW Moving Company. We have an obligation to ensure that all our employees are afforded the protection of an appropriate safety & health program.

Hazard assessment, pre-planning, and engineering controls, where feasible, will be the preferred method of providing a safe workplace. Hazards that remain will be minimized or eliminated through training which provides our employees the ability to recognize workplace hazards and understand the proper procedural and/or personal protective equipment requirements.

Each employee is encouraged to contact their supervisor immediately should a safety or health risk exist so that corrective action may be taken to eliminate the hazard entirely or deal with the hazard in a safe manner through modified work procedures, PPE, and/or other appropriate action.

Oleksii Dudar, our Safety Director, or a designated competent person will make routine and random inspections to both identify new hazards and to monitor the effectiveness of our safety & health program.

In the final analysis, the success of our safety effort depends on all employees from senior management to the newest hire demonstrating a commitment to safety by working in a safe manner. Safe job performance is how our safety effort is ultimately measured.

Accident/Injury Prevention

Our safety program is designed so that our employees do not work in conditions that are unsanitary, hazardous, or dangerous to their health or safety.

One lax moment in terms of safety may result in a lifetime of needless pain and suffering. Disregarding safety standards may even be fatal. While an accident may happen in an instant, the consequences may last for years.

Accident prevention requires a commitment from all personnel within our company to actively participate in our safety program. All personnel should be aware of workplace-related hazards and follow procedures to eliminate these hazards by using proper work methods, use of personal protective equipment, and proper use of tools and equipment. All persons are encouraged to ask questions and make positive suggestions for safety improvement.

Competent persons will be designated to provide workplace expertise, as well as regular inspections of equipment, materials, and procedures.

Competent persons will have the authority to stop work if a safety hazard is identified and it cannot be corrected immediately.

All machinery, tools, materials, and equipment deemed unsafe will be taken out of service by physically removing, tagging, or locking controls to render them inoperable.

Only persons qualified by training or experience will be allowed to operate equipment or machinery.

All tools and items of equipment will be used for the purpose for which they were designed. For example, a wrench is not a hammer, a ladder is not a horizontal plank, and a fire extinguisher is not a cooler!

Never take chances or attempt any procedure without being aware of the proper methods, the potential safety hazards, and the methods to reduce or eliminate risk.

Company Personnel

The following are descriptions of the different roles and expectations for all personnel of DFW Moving Company.

Safety Director

The safety director at DFW Moving Company is Oleksii Dudar and has overall responsibility for the implementation of our program. Oleksii Dudar will ensure each employee has appropriate safety training for the tasks to be performed.

Additionally, Oleksii Dudar will perform hazard assessments of the workplace to determine if hazards are present, or are likely to be present, which will necessitate the use of personal protective equipment (PPE).

Identified hazards which cannot be eliminated through engineering controls or changes in procedures will be addressed by the use of selected PPE.

While the responsibilities of Oleksii Dudar cannot be further delegated, most of the duties can be assigned to those who are competent persons by virtue of training or experience.

Safety Program Administrator

Jake Pritchard, the safety program administrator, has deemed competent by our Safety Director and may perform the below duties:

- a. The actual training of personnel.
- b. Maintenance of training records.
- c. Random inspections to verify adherence to safety rules and policies.
- d. Completion of specific tasks identified within our OSHA compliance programs.
- e. Hazard assessments.

Note: The safety director and the safety program administrator may or may not be the same person.

Employees

All employees are required to participate actively in the safety & health program at DFW Moving Company. Do not hesitate to point out perceived safety deficiencies to your supervisor or the competent person – you may prevent an injury to yourself or a fellow worker. With the goal of providing a safer workplace for all of us, employee suggestions for improving safety management are welcomed and encouraged. Never perform a task when you don't understand all of the safety procedures. If in doubt, ask your immediate supervisor for guidance.

Safety Meetings

Scheduled safety meetings provide an opportunity for reinforcing the importance of general safety as well as specific work-related procedures applicable to the work at hand.

Properly prepared safety meetings will focus on one or two topics and be direct and to the point. All safety questions will be addressed, and interactive participation is encouraged.

Housekeeping

Housekeeping? What's that all about? It's about safety!

Employees are to maintain a neat and orderly work area as far as practical. Housekeeping and general cleanliness have a direct effect on safety and health. Proper housekeeping can prevent slips and falls, allow easy egress in the event of an emergency, prevent falling object injuries, and enhance fire safety. Below listed are general housekeeping rules:

- a. All areas of the workplace - passageways, storerooms, service rooms, and walking-working surfaces – will be kept in a clean, orderly, and sanitary condition.
- b. Walking-working surfaces will be maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice.
- c. Stored materials will be neatly stacked.
- d. Containers, when not in use, will be sealed.
- e. No objects will be left unattended on stairways.
- f. Entrances and exits will be properly marked and not blocked.
- g. Tools will be properly cleaned and put away after use.
- h. The floor of each workroom will be maintained in a clean and, to the extent feasible, dry condition. When wet processes are used, drainage must be maintained and, to the extent feasible, dry standing places, such as false floors, platforms, and mats must be provided.

Sanitation

This applies to permanent places of employment.

Waste Disposal

Any receptacle used for perishable solid or liquid waste or refuse must be constructed so that it does not leak and may be thoroughly cleaned and maintained in a sanitary condition. All receptacles must be equipped with a solid tight-fitting cover unless it can be maintained in a sanitary condition without a cover.

All sweepings, solid or liquid wastes, refuse, and garbage will be removed in such a manner as to avoid creating a menace to health, and as often as necessary or appropriate to maintain the place of employment in a sanitary condition.

Vermin Control

Every enclosed workplace must be constructed, equipped, and maintained, so far as reasonably practicable, as to prevent the entrance or harborage of rodents, insects, and other vermin. A continuing and effective extermination program must be instituted if their presence is detected.

Water Supply

Potable Water

Potable water will be provided for drinking, washing of the person, cooking, washing of foods, washing of cooking or eating utensils, washing of food preparation or processing premises, and personal service rooms.

Portable drinking water dispensers must be designed, constructed, and serviced so that sanitary conditions are maintained, be capable of being closed, and be equipped with a tap.

Open containers such as barrels, pails, or tanks for drinking water from which the water must be dipped or poured, whether or not they are fitted with a cover, are prohibited.

A common drinking cup and other common utensils are prohibited.

Non-Potable Water

Outlets for non-potable water, such as water for industrial or firefighting purposes, must be marked in a manner that will indicate clearly that the water is unsafe and is not to be used for drinking, washing of the person, cooking, washing of food, washing of cooking or eating utensils, washing of food preparation or processing premises, or personal service rooms, or for washing clothes.

Construction of non-potable water systems or systems carrying any other non-potable substance must be such as to prevent backflow or back-siphonage into a potable water system.

Non-potable water cannot be used for washing any portion of the person, cooking or eating utensils, or clothing. Non-potable water may be used for cleaning work premises, other than food processing and preparation premises and personal service rooms provided that this non-potable water does not contain concentrations of chemicals, fecal coliform, or other substances which could create unsanitary conditions or be harmful to employees.

Toilet Facilities

Note: The below requirements do not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation immediately available to appropriate, nearby toilet facilities.

Toilet facilities, in toilet rooms separate for each sex, must be provided in all places of employment in accordance with table J-1 below. The number of facilities to be provided for each sex will be based on the number of employees of that sex for whom the facilities are furnished. Where toilet rooms will be occupied by no more than one person at a time, can be locked from the inside, and contain at least one water closet, separate toilet rooms for each sex need not be provided. Where such single-occupancy rooms have more than one toilet facility, only one such facility in each toilet room can be counted.

Table J-1

Number of Employees	Minimum Number of Water Closets ¹
1 to 15	1
16 to 35	2
36 to 55	3
56 to 80	4
81 to 110	5
111 to 150	6
Over 150	1 additional fixture for each additional 40 employees.
¹ Where toilet facilities will not be used by women, urinals may be provided instead of water closets, except that the number of water closets in such cases shall not be reduced to less than 2/3 of the minimum specified.	

The sewage disposal method must not endanger the health of employees.

Each water closet must occupy a separate compartment with a door and walls or partitions between fixtures sufficiently high to assure privacy.

Washing Facilities.

Washing facilities must be maintained in a sanitary condition.

Lavatories

Note: The below requirements do not apply to mobile crews or to normally unattended work locations so long as employees working at these locations have transportation immediately available to appropriate, nearby lavatory facilities.

Each lavatory must be provided with hot and cold running water, or tepid running water.

Hand soap or similar cleansing agents will be provided.

Individual hand towels or sections thereof, of cloth or paper, air blowers or clean individual sections of continuous cloth toweling, convenient to the lavatories, will be provided.

Showers.

Whenever showers are required:

- a. One shower will be provided for each 10 employees of each sex, or numerical fraction thereof, who are required to shower during the same shift.
- b. Body soap or other appropriate cleansing agents will be provided.
- c. Showers will be provided with hot and cold water feeding a common discharge line.
- d. Employees who use showers must be provided with individual clean towels.

Change Rooms

Whenever employees are required by a particular standard to wear protective clothing because of the possibility of contamination with toxic materials, change rooms equipped with storage facilities for street clothes and separate storage facilities for the protective clothing will be provided.

Where working clothes are provided by the employer and become wet or are washed between shifts, provision must be made to ensure that such clothing is dry before reuse.

Consumption of Food and Beverages

Note: This applies only where employees are permitted to consume food or beverages, or both, on the premises.

Employees are not permitted to consume, or store, food or beverages in a toilet room, or in any area exposed to a toxic material.

Receptacles will be provided to use for the disposal of waste food, and they will be constructed of smooth, corrosion resistant, easily cleanable, or disposable materials. The number, size, and location of such receptacles will encourage their use and not result in overfilling. Containers must be emptied not less frequently than once each working day, unless unused, and will be maintained in a clean and sanitary condition. Receptacles have to have a solid tight-fitting cover unless sanitary conditions can be maintained without use of a cover.

All employee food service facilities and operations must be carried out in accordance with sound hygienic principles. In all places of employment where all or part of the food service is provided, the food dispensed must be wholesome, free from spoilage, and processed, prepared, handled, and stored in such a manner as to be protected against contamination.

Safe Office Practices

When employees are working in areas such as offices, warehouses, storage areas, garages, etc., compliance with the below safety practices/procedures is mandatory. Supervisors will insist that the safety practices and procedures are observed and are expected to take disciplinary action against employees for non-compliance.

Employees must:

- a. Report all unsafe conditions and equipment to their supervisor or Jake Pritchard, our safety program administrator.
- b. Report all incidents, injuries and illnesses to their supervisor or Jake Pritchard immediately.
- c. Keep means of egress unblocked, well-lit, and unlocked during work hours.
- d. Sound the alarm and evacuate in the event of fire.
- e. Upon hearing fire alarm, stop work and proceed to the nearest clear exit and then gather at the designated muster location.
- f. Not attempt to respond to a fire or other emergency unless trained to do so.
- g. Keep stairways clear of items that can be tripped over.
- h. Not store combustibles under stairways that are egress routes.
- i. Not store materials and equipment against doors or exits, fire ladders or fire extinguisher stations.
- j. Keep aisles clear at all times.
- k. Maintain work areas in a neat, orderly manner. Place trash and refuse into proper waste containers.
- l. Wipe up all spills promptly.
- m. Store files and supplies in such a manner as to preclude damage to the supplies or injury to personnel when they are moved. Heaviest items should be stored closest to the floor and lightweight items stored above.
- n. Ensure all cords running into walk areas are taped down or inserted through rubber protectors to preclude them from becoming tripping hazards.
- o. Never stack material precariously on top of lockers, file cabinets or other high places.
- p. Never leave desk or cabinet drawers open that present a tripping hazard. Use care when opening and closing drawers to avoid pinching fingers.
- q. Not open more than one upper drawer at a time, particularly the top two drawers on tall file cabinets.
- r. Always use the proper lifting techniques. Never attempt to lift or push an object which is too heavy. Contact your supervisor when help is needed to move a heavy object.
- s. Exercise caution when carrying material to ensure firm footing and clear line of sight.
- t. Plug all electrical equipment into appropriate wall receptacles or into an extension of only one cord of similar size and capacity. Three- pronged plugs should be used to ensure continuity of ground.

- u. Keep individual heaters at work areas clear of combustible materials such as drapes or waste from waste baskets. Heaters which are equipped with tip over switches should be used.
- v. Keep appliances such as coffee pots and microwaves in working order and inspected for signs of wear, heat, or fraying of cords.
- w. Ensure fans used in work areas are guarded. Guards must not allow fingers to be inserted through the mesh. All fans must be equipped with proper guards which have openings of ½ inch or less.
- x. Use equipment such as scissors, staplers, etc. for their intended purposes only. They are not to be used as hammers, pry bars, screwdrivers, etc. Misuse can cause damage to the equipment and possible injury to the user.
- y. Store cleaning supplies away from edible items on kitchen shelves.
- z. Store cleaning solvents and flammable liquids in appropriate containers.
- aa. Keep solutions that may be poisonous or not intended for consumption in well-labeled containers.
- ab. Not remove or deface equipment or product ANSI or other warning signs/symbols and they must heed their warnings.
- ac. Ensure owner's manuals for office equipment are readily available.
- ad. Ensure a list of hazardous chemicals, if applicable, and SDS are readily available.

The above list is not all inclusive. Employees are encouraged to suggest additional safety ideas and/or procedures to Oleksii Dudar, our Safety Director for inclusion in weekly safety meetings.

Lifting, Pushing, and Pulling

Back injuries are often caused by the obvious – putting excessive strain on the lower back by lifting an object that is too heavy or awkward, or by bending and/or twisting while lifting.

However, lifting injuries are also caused by less obvious reasons:

- a. Poor physical condition
- b. Poor posture
- c. Poor judgment (lifting, pulling, pushing an object that is obviously too heavy or awkward without seeking assistance or a mechanical lifting device.)
- d. Lack of exercise
- e. Excessive body weight

Proper lifting techniques are important for employee safety. Below are lifting techniques that will reduce the likelihood of injury:

- a. Lift objects comfortably, not necessarily the quickest or easiest way.
- b. Lift, push, and pull with your legs, not your arms or back.
- c. When changing direction while moving an object, turn with your feet, not by twisting at the waist.
- d. Avoid lifting higher than your shoulder height.
- e. When standing while working, stand straight.
- f. When walking, maintain an erect posture; wear slip-resistant, supportive shoes.
- g. When carrying heavy objects, carry them close to the body and avoid carrying them in one hand.
- h. When heavy or bulky objects need to be moved, obtain help or use a mechanical aid such as a dolly, hand truck, forklift, etc.
- i. When stepping down from a height of more than eight inches, step down backwards, not forward.
- j. Handle heavy objects close to the body – avoid reaching out.
- k. Lift gradually and smoothly. Avoid jerky motions.
- l. Maintain a clear line of vision.

Slips, Trips, and Falls

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

- a. Running at the workplace.
- b. Engaging in horseplay.
- c. Working off a ladder that is not firmly positioned.
- d. Carrying an object that blocks line of vision.
- e. Work boots not laced or buckled.
- f. Working off a scaffold without safety rails.
- g. Using ladders that have oil and grease on the rungs.
- h. Not using a handrail on steps.
- i. Messy work areas with debris strewn about.
- j. Not paying attention to what one is doing.

This list can go on and on, but all of the above are easily preventable by adherence to common safety procedures, common sense, and awareness of potential hazards.

Drugs, Alcohol, and Other Prohibited Behaviors

Drug Free Workplace

Because the type of work we perform can result in serious injury if employees are not capable of focusing not only on their job task, but their surroundings and others with whom they work, it is the policy of DFW Moving Company to hire only persons free from any evidence of illegal use of controlled substances or other drugs including alcohol.

Note: OSHA has determined that drug testing after injuries or illnesses that occur at the workplace can be considered retaliatory or discriminatory, and thus discourage employees from properly reporting the injury or illness. This can be the case in situations where the injury or illness wouldn't have been reasonably expected to be the result of impairment.

Example: A bee sting that results in an allergic reaction and leads to a stay at the hospital. There is not a reasonable belief that a bee sting would be caused by impairment and thus drug testing would be considered retaliatory or discriminatory.

With the exception of over the counter drugs such as aspirin or drugs prescribed by a physician, there will be no drugs or alcohol within our facility. Alcohol and drug abuse cause an unacceptable level of safety hazard not only for the offending employee, but for others in the vicinity. Those found to be under the influence of drugs and/or alcohol will be immediately removed from the work area by the competent person and further disciplinary action will be taken by Oleksii Dudar, our Safety Director.

Chemical dependency is a devastating problem for not only the employee, but also the employee's family and co-workers. For obvious safety reasons, it cannot be tolerated in the workplace. Those with such a problem should seek professional help. Oleksii Dudar will assist any employee in finding appropriate treatment should they voluntarily come forward.

Smoking

There will be no smoking except in designated smoking areas. Under no circumstances will there be smoking during refueling of vehicles or within 50 feet of flammable materials.

Prohibited Behaviors

The use, bringing onto company property, possession, concealment, transportation, promotion or sale of the following substances or items by any employee of the below items is strictly prohibited:

- a. Illegal drugs, unauthorized controlled substances, look-a-likes, designer, synthetic or any other drug which may affect an employee's motor functions or alter a person's working perception.
- b. Prescription drugs/over the counter medication except under the following conditions:
 1. The employee will inform his supervisor prior to using any prescription drug or over the counter medication and receive written permission to possess such drug while working.
 2. The prescription vial will be labeled by the dispensing pharmacy and the label will show the employees name, physician, prescription number, date the prescription was filled and the dosage rate. Prescriptions more than 30 days old will not be allowed.
 3. The over the counter medication will be in its original package or container.
 4. The employee may only possess enough medication for his normal shift.
- c. Alcoholic beverages.
- d. Firearms, weapons, explosives, and ammunition.
- e. Unauthorized items such as stolen property.

Workplace Violence

Although OSHA does not have any standards concerning workplace violence, to comply with Section 5(a)(1) of the Occupational Safety and Health Act (OSHA) of 1970, which requires us to provide our employees with a place of employment that is free from recognizable hazards that are causing or likely to cause death or serious harm to our employees, we are employing this policy regarding workplace violence.

Workplace violence can be defined as: “any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site.” Keep in mind actions such as shouting, swearing, and destroying or throwing items could be considered workplace violence if the complaining employee feels their safety is in jeopardy.

The CDC identifies 4 types of workplace violence:

- a. Criminal Intent - workplace violence occurring during the process of criminal activity (e.g., robbery)
- b. Customer/Client - workplace violence targeting an employee of a business by a customer/client
- c. Worker-on-Worker - workplace violence occurring between two (2) employees
- d. Personal Relationship - workplace violence occurring between an employee and a personal acquaintance who has no ties to the workplace.

When possible and applicable, we will implement recommended engineering and administrative controls to prevent or reduce the likelihood of all types of workplace violence. Some of these controls may include, but are not limited to:

- a. Lighting controls
- b. Surveillance (e.g., cameras, mirrors)
- c. Establishing a good relationship with local police
- d. Training on specific workplace violence events, such as responding to an active shooter
- e. Performing appropriate background checks and reference verification on new hires

In the event that our employees are exposed to workplace violence instigated by acts of our employees or others, the following steps will be taken immediately:

- a. Those not directly threatened or exposed to the violent acts will immediately warn others and remove themselves from the area. Call 911, or local police authorities, when you've reached a point of safety.
- b. If you feel you are about to become a victim of workplace violence and you do not have the opportunity to flee, try to remain calm. Do nothing threatening. At the first opportunity, seek safety and call 911 or local police authorities.

Any employee who is a victim of any type of workplace violence, physical or verbal, is to immediately notify his or her supervisor. If an employee's direct supervisor is the offender, the employee should go to the next level of management. Violent actions that result in injury will be reported to the police without exception.

An internal investigation will begin immediately and will include interviews with involved parties, including potential witnesses. When possible, we will do our best to maintain privacy during the investigation and follow-up response. Our company expressly prohibits retaliation of any kind against any employee bringing a complaint or assisting in the investigation of a complaint. Such employees may not be adversely affected in any manner related to their employment. Retaliation is also illegal under federal law.

Any breach of workplace behavior that leads to a violent action against another employee will be treated as a serious safety violation subject to extreme corrective action, up to and including termination.

Emergency Action Plan

An Emergency Action Plan, if appropriate, will be posted along with emergency telephone numbers and an escape route diagram.

After a hazard assessment of our facilities, Oleksii Dudar, our Safety Director, may determine that conditions may develop that could possibly warrant an evacuation. In this case an emergency action plan will be developed to address the threat.

Events may occur which dictate the evacuation of our facility such as a fire, explosion, power failure, etc. Additionally, events may occur which dictate the need for emergency medical responders. These sets of events fall under our Emergency Action Plan and a multitude of objectives must be met.

The first and foremost objective is the safety of all our personnel. To achieve this level of safety, our plan is designed to get personnel away from danger, treat injury, and provide for a thorough and accurate accounting of all employees.

There may be situations where certain employees, trained in first aid and/or firefighting procedures, may prevent a small emergency situation from becoming a major disaster. In these types of situations, specifically identified employees will remain to perform the function for which they are trained, provided they may perform these duties in a safe manner. At no time will any employee put himself/herself at risk.

To the extent possible, all personnel will have clear, direct egress.

The actual implementation of this plan must be direct and carried out without confusion.

Employees must know how to alert others, how to call for assistance, the location of fire extinguishers and first aid kits, the escape route, and the rendezvous point (being accounted for so that others do not put themselves at risk looking for a person who has already reached safety).

Emergency Medical Response

Should an injury occur that requires an emergency medical responder, the below listed actions will be taken in the order given:

- a. Call 911 or the emergency response number posted at the workplace.
 1. In the absence of 911 services, the telephone numbers of physicians, hospitals, or ambulances will be conspicuously posted with our emergency phone numbers. The method of contacting emergency services must be effective at the required location and should be tested to ensure reliability.
 2. In remote areas that do not have automatic location capability for 911, we will post either the latitude and longitude of the worksite or other location identification information that effectively communicates the location of the worksite in a conspicuous location.
- b. Provide any medical assistance you are trained and certified to do. **DO NOT** provide any medical assistance you are not trained to do.
- c. Designate an individual to direct the emergency responders to the injured person and provide Safety Data Sheets, if applicable.
- d. Notify the competent person who, in turn, will notify the office.

Fire Protection

The phone number of the local fire department will be posted with other emergency numbers.

If a fire should occur, all personnel and the local fire department will be notified. As in all emergency situations, per the American Trauma Society, people calling the fire department should:

- a. Remain calm
- b. Speak clearly and slowly
- c. Give the exact location
- d. Describe the situation
- e. Give the phone number from where you are calling.
- f. Do not hang up until told to do so

Fire Prevention Plan

Fire Prevention deals not with handling a fire emergency, but rather preventing a fire in the first place.

To reduce the likelihood of a fire, personnel are to adhere to the following rules:

- a. Smoking is allowed only in designated areas and smoking materials will be totally extinguished and placed in the appropriate receptacles.
- b. All chemical products will be handled and stored in accordance with the procedures noted on their individual SDS.
- c. Heat producing equipment will be properly maintained and operated per the manufacturer's instructions to prevent accidental ignition of combustible materials.
- d. Precautions will be taken when working with an open flame (such as welding) and those areas will be made fire safe by removing or protecting combustibles from ignition.
- e. Combustible liquids must be stored in approved containers.
- f. Chemical spills must be cleaned up immediately. This is particularly important for combustible and reactive liquids. Damaged chemical containers and cleanup materials must be properly disposed.

Note: Information on appropriate personal protective equipment, proper disposal, proper cleanup procedures, required ventilation, etc. is found on the product's SDS.

- g. Combustible liquids and trash must be segregated and kept from ignition sources.
- h. Keep clear access to fire hydrants as well as portable fire extinguishers.
- i. Personnel will be notified by their Supervisor or the competent person of any unusual fire hazard conditions.
- j. Good housekeeping, good housekeeping!

Portable Fire Extinguishers

All personnel will receive instruction on the proper use of fire extinguishers.

- a. Fire extinguishers will be inspected monthly for general conditions and adequate charge. They will be serviced and certified by qualified personnel at least annually.
- b. Portable fire extinguisher locations will be clearly identified and easily accessible.

Portable fire extinguishers will be distributed as indicated below:

Class	Distribution	Notes
A "A" on a green triangle	75 feet or less travel distance between the employee and the extinguisher	For use on wood, paper, trash, etc.
B "B" on a red square	50 feet or less travel distance between hazard area and the extinguisher	For use on flammable liquid, gas, etc.
C "C" on a blue circle	Based on the appropriate pattern for the existing Class A or Class B hazards	For use on electrical fires
D "D" on a yellow star	75 feet or less travel distance between the combustible metal working area and the extinguisher or other containers or Class D extinguishing agent	For use on combustible metals

Appropriate portable fire extinguishers will be used, as noted above. Supervisors will ensure that at least one extinguisher is on each floor of a project near the stairway.

Using the wrong fire extinguisher on some fires can actually spread the fire. Using a Type-A extinguisher on an electrical fire, for example, could cause serious injury. When a fire occurs, it is imperative to use the proper extinguisher.

First Aid and First Aid Kits

Should a medical emergency occur, other than minor scrapes and bruises, and it is serious enough to call for professional medical assistance, you should call the Emergency Response Number posted on the bulletin board. Before the first aid providers arrive, to the extent possible, clear the way so they can reach the injured employee in the most direct way possible.

Unless trained and licensed in CPR/first aid and a designated first aid provider as an additional job as part of the company bloodborne pathogen program, employees will not expose themselves to blood or other bodily fluids of other employees at any time.

Per OSHA, first aid is limited to:

- a. Using a non-prescription medication, such as aspirin, at non-prescription strength.
- b. Cleaning, flushing or soaking wounds on the surface of the skin;
- c. Using wound coverings such as bandages, Band-Aids™, gauze pads, etc., or using butterfly bandages or Steri-Strips™.
- d. Using hot or cold therapy.
- e. Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc.
- f. Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.).
- g. Draining fluid from a blister.
- h. Using eye patches.
- i. Removing foreign bodies from the eye using only irrigation or a cotton swab.
- j. Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- k. Using finger guards.
- l. Using massages.
- m. Drinking fluids for relief of heat stress.

If an employee is injured and emergency responders have been called, stay calm and reassure the injured employee that help is coming.

Below is basic first aid for various common workplace injuries. Mostly, it is what **not** to do. When dealing with any injury, stay calm and never do anything unless you know what you are doing.

MINOR BURNS

(Redness or blisters over 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 sterile dressing and seek medical attention promptly.

Do not apply salves, ointments or anything else.

Do not break 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 sterile dressing.

Seek medical attention promptly.

Do not use anything but water on burned area.

Do not break open blisters.

EYE - FOREIGN OBJECT

(Object visible; feeling of something in the eye)

Have patient pull upper eyelid over lower eyelid.

Run plain water over eye.

If object does not wash out, cover both eyes with a gauze dressing.

Seek medical attention promptly.

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, cold compress or ice pack may relieve pain and reduce swelling.

Do not try to remove any embedded object.

Do not apply pressure to 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.

Note: In work situations where a possibility of eye (or body) exposure to corrosive materials exists, suitable facilities for quick-drenching or flushing will be provided in the immediate work area.

Cover both eyes with sterile dressing.

Seek medical help immediately.

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.

First Aid Kits:

First aid kits are worthless if not readily accessible. Therefore, they will not be locked up at the workplace. They're also not very valuable if the items you need are missing. It's very important that the kits have the proper items and that they are replenished as they are used.

OSHA defers to ANSI for determining what qualifies as an acceptable first aid kit for the workplace. The ANSI standard that addresses first aid kits is ANSI/ISEA Z308.1-2015. Two important topics covered in this standard are what items are required to be included in a first aid kit: Class, and in what kind of container the kit is kept: Type.

Class

There are two classes of first aid kits: Class A and Class B. The two classes are divided based on the type of first aid items included and the number of those items available in the kit. ANSI has defined the classes as follows:

Class A first aid kits are intended to provide a basic range of products to deal with the most common types of injuries encountered in the workplace including: major wounds, minor wounds (cuts and abrasions), minor burns and eye injuries.

Class B first aid kits are intended to provide a broader range and quantity of supplies to deal with injuries encountered in more populated, complex and/or high-risk work environments.

The biggest difference between the classes of first aid kits is the amount of items included in the kit. Class B kits have more of each item and are needed at a workplace that has many workers.

Keep in mind that sterile items will be individually wrapped, sealed, and used only once. Other items, such as tape or scissors, can be reused and should be kept clean.

The supplies consumed in first aid kits can actually be used as a measure of safety. For example, if a kit constantly needs replacement of bandages used for minor cuts, there is an obvious problem. Why are cuts happening in the first place? Actual trends can be established, and corrective procedures initiated, such as a protective glove requirement or improved handling practices.

Remember, improper medical treatment can be more dangerous than no treatment at all. Only provide care that you have been trained and certified to do.

Below are the required contents, items and quantities of Class A and B first aid kits:

Class A	Class B
16 Adhesive Bandage 1 x 3 in. 1 Adhesive Tape 2.5 yd (total) 10 Antibiotic Application 1/57 oz 10 Antiseptic 1/57 oz 1 Breathing Barrier 1 Burn Dressing (gel soaked) 4 x 4 in. 10 Burn Treatment 1/32 oz 1 Cold Pack 4 x 5 in. 2 Eye Covering w/ means of attachment 2.9 sq. in. 1 Eye/Skin Wash 1 fl oz total 1 First Aid Guide 6 Hand Sanitizer 1/32 oz 2 pr Medical Exam Gloves 1 Roller Bandage 2 in. x 4 yd 1 Scissors 2 Sterile pad 3 x 3 in. 2 Trauma pad 5 x 9 in. 1 Triangular Bandage 40 x 40 x 56 in.	50 Adhesive Bandage 1 x 3 in. 2 Adhesive Tape 2.5 yd (total) 25 Antibiotic Application 1/57 oz 50 Antiseptic 1/57 oz 1 Breathing Barrier 2 Burn Dressing (gel soaked) 4 x 4 in. 25 Burn Treatment 1/32 oz. 2 Cold Pack 4 x 5 in. 2 Eye Covering w/ means of attachment 2.9 sq. in. 1 Eye/Skin Wash 4 fl. oz. total 1 First Aid Guide 10 Hand Sanitizer 1/32 oz 4 pr Medical Exam Gloves 2 Roller Bandage 2 in. x 4 yd 1 Roller Bandage 4 in. x 4 yd 1 Scissors 1 Splint 4 Sterile pad 3 x 3 in. 1 Tourniquet 4 Trauma pad 5 x 9 in. 2 Triangular Bandage 40 x 40 x 56 in.

Type

As important as the contents are, the first aid kit won't be very useful if it's not properly protected from the workplace environment. If the supplies are soaked from rain or smashed from being tossed around, they just won't be able to provide any help when needed. ANSI has addressed this by providing guidelines for the containers that first aid kits can be stored in at the workplace.

They are broken down into four categories: **Type I, Type II, Type III, & Type IV.** Here are the descriptions that ANSI provides for each type.

Type I first aid kits are intended for use in stationary, indoor settings where the potential for damage of kit supplies due to environmental factors and rough handling is minimal. Type I first aid kits will have a means for mounting in a fixed position and are generally not intended to be portable.

Note: Typical applications for Type I first aid kits may include, but are not limited to, the following: general indoor use, an office setting or a manufacturing facility. First aid cabinets would generally fall into the Type I classification.

Type II first aid kits are intended for portable use in indoor settings where the potential for damage of kit supplies due to environmental factors and rough handling is minimal.

Note: Typical applications for Type II first aid kits may include, but are not limited to, the following: general indoor use, an office setting or a manufacturing facility.

Type III first aid kits are intended for portable use in mobile, indoor and/or outdoor settings where the potential for damage of kit supplies due to environmental factors is not probable. Type III kits will have a means to be mounted in a fixed position and will have a water-resistant seal.

Note: Typical applications for Type III first aid kits may include general indoor use and sheltered outdoor use.

Type IV first aid kits are intended for portable use in the mobile industries and/or outdoor settings where the potential for damage to kit supplies due to environmental factors and rough handling is significant. Type IV kits will have a means to be mounted in a fixed position and will meet the performance requirements set forth by ANSI.

Note: Typical applications for Type IV first aid kits may include, but are not limited to, the following: the transportation industry, the utility industry, the construction industry, and the armed forces.

Accident Investigation

The purpose of Accident Investigation is to prevent the same type of accident from reoccurring. An accident investigation will begin immediately after the medical crisis is resolved. The supervisor /competent person will complete an Accident Investigation Form as soon as feasible. The five questions that must be answered are: Who? What? When? Where? And most importantly, why did the accident happen?

An apparently simple accident may actually be caused by many complex reasons. Example: an employee gets a finger crushed in a piece of machinery. With just the facts presented, the fault would seem to totally rest with the employee whose finger was hurt.

An accident investigation may reveal other contributing factors by answering questions like:

- a. Were machine guards in place? Had they been altered in an unauthorized manner to make them ineffective?
- b. Were gloves required and were they available?
- c. Was the machinery improperly locked or tagged out of service with residual hazardous energy remaining in its system?
- d. Had the employee received training on operating the specific machine and been given an opportunity to clarify questions concerning its operation?
- e. Was there adequate supervision?
 1. Did the supervisor perform regular and frequent inspections of the operations in question?
 2. Had this employee or others, operated the machine incorrectly over a period of time so that the improper method became the standard method?
 3. Were violations of safety procedures documented?

After determining the cause of the accident, steps can be taken to prevent a reoccurrence. Near-miss mishaps, events which result in no injury or damage, should be investigated because even though the outcomes are different, the causes are the same.

Recordkeeping: Injuries & Illnesses

OSHA Forms 300; 300A & 301

As a matter of law, all employers with 11 or more employees **at any one time** in the previous year must maintain OSHA Form 300, *Log of Work-Related Injuries and Illnesses*, OSHA Form 301, *Injury and Illness Incident Report*, and OSHA Form 300A, *Summary of Work-Related Injuries and Illnesses*.

OSHA Forms 300 and 301 are used to record and classify occupational injuries and illnesses. The information on the OSHA Form 300 is related to employee health and must be used in a manner that protects the confidentiality of the employees to the extent possible. Recordable injuries and illnesses must be entered on OSHA Forms 300 and 301 within seven (7) days of receiving information that a recordable injury or illness has occurred.

Electronic Submission of Records

Effective February 25th, 2019, certain employers are required to electronically submit injury and illness data from their OSHA Form 300A Summary of Work-Related Injuries and Illnesses to OSHA. This includes all employers with 250 or more employees and employers with 20-249 employees who have a NAICS code listed in Appendix A to Subpart E of Part 1904 - Recording and Reporting Occupational Injuries and Illness.

[Click here to see Appendix A.](#)

Note: Contact your local worker's compensation office if you're uncertain of your NAICS code.

If DFW Moving Company is required to submit records electronically, the information from our 300A must be submitted by March 2 of the following year (for example, 2018 data must be submitted by March 2, 2019).

OSHA provides a secure website that offers three options for data submission:

- a. Users will be able to manually enter data into a webform.
- b. Users will be able to upload a CSV file.
- c. Users will have the ability to transmit data electronically via an API if they have an automated recordkeeping system.

[Click Here to Access the Injury Tracking Application](#)

Retention of Forms:

Old OSHA Forms 101 and 200, as well as OSHA Forms 300, 300A, and 301, will be retained for five years following the year to which they relate.

Items to be recorded on OSHA Forms 300, 300A and 301:

Work related injuries and illnesses and fatalities are to be recorded using the criteria found in Part 1904, *Recording and Reporting Occupational Injuries and Illnesses*.

Injuries and illnesses must be recorded if they result in death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid, loss of consciousness, or if the injury or illness involves a significant injury diagnosed by a physician or licensed health care professional even if it does not meet the forgoing conditions.

Note: First aid (which is not reportable) is defined in 29 CFR 1904.7(b)(5)ii.

Employee Involvement:

As an employee, you have the right and responsibility to report all work-related injuries and illness without the fear of being retaliated against, discriminated against, or terminated from employment.

Note: OSHA has determined that drug testing after injuries or illnesses that occur at the workplace can be considered retaliatory or discriminatory, and thus discourages employees from properly reporting the injury or illness. This can be the case in situations where the injury or illness wouldn't have been reasonably expected to be the result of impairment.

Example: A bee sting that results in an allergic reaction and leads to a stay at the hospital. There is not a reasonable belief that a bee sting would be caused by impairment and thus drug testing would be considered retaliatory or discriminatory.

As a matter of policy, all employees are to report all work-related accidents and injuries immediately to the competent person/supervisor at the workplace. The competent person/supervisor will complete an accident investigation form and will forward it to Oleksii Dudar, the Safety Director.

Oleksii Dudar will extrapolate appropriate information for completion of the OSHA Form 300 and complete a review of our policies and procedures to help ensure that there isn't a reoccurrence of the reported injury or illness.

Failure to report injuries or illnesses would be a violation of our company's reporting policy and is not acceptable.

Catastrophic Reporting Requirements:

The following events have to be reported to OSHA:

- a. All work-related fatalities
- b. All work-related in-patient hospitalizations of one or more employees
- c. All work-related amputations
- d. All work-related losses of an eye

DFW Moving Company must report work-related fatalities within 8 hours of finding out about it. For any in-patient hospitalization, amputation, or eye loss, we must report the incident within 24 hours of learning about it.

Only fatalities occurring within 30 days of the work-related incident must be reported to OSHA. Further, an inpatient hospitalization, amputation or loss of an eye incident must be reported to OSHA only if they occur within 24 hours of the work-related incident.

There are three options for reporting the event:

- a. By telephone to the nearest OSHA Area Office during normal business hours. The phone numbers can be found at the following website: <https://www.osha.gov/html/RAMap.html>.
- b. By telephone to the 24-hour OSHA hotline (**1-800-321-OSHA or 1-800-321-6742**).
- c. By using OSHA's new means of reporting events electronically. This can be done online at the following website: <https://www.osha.gov/pls/ser/serform.html>.

Information to Be Reported:

When reporting a fatality, in-patient hospitalization, amputation or loss of an eye to OSHA, following information must be reported:

- a. Establishment name
- b. Location of the work-related incident
- c. Time of the work-related incident
- d. Type of reportable event (i.e., fatality, in-patient hospitalization, amputation or loss of an eye)
- e. Number of employees who suffered the event
- f. Names of the employees who suffered the event
- g. Contact person and his or her phone number
- h. Brief description of the work-related incident

Note: An event does not have to be reported if it:

- a. Resulted from a motor vehicle accident on a public street or highway, except in a construction work zone; employers must report the event if it happened in a construction work zone.
- b. Occurred on a commercial or public transportation system (airplane, subway, bus, ferry, street car, light rail, train).
- c. Occurred more than 30 days after the work-related incident in the case of a fatality or more than 24 hours after the work-related incident in the case of an in-patient hospitalization, amputation, or loss of an eye.

Note: DFW Moving Company must report an in-patient hospitalization due to a heart attack, if the heart attack resulted from a work-related incident.

Location of OSHA Forms 300 and 301:

As a general rule, the OSHA Forms 300 and 301 will be maintained in our main office.

Incident Rate:

One indication of the success of the safety effort put forth by DFW Moving Company is our "incidence rate". When bidding a job, our incidence rate could be a determining factor in a successful bid. The incidence rate is determined by the following formula:

$N/EH \times 200,000$ where:

N = number of injuries and/or illnesses

EH = total hours worked by all employees during the calendar year.

200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year).

To find the "Lost Workday Injury Rate" (LWDI), the following formula is used:

$WDI \text{ Rate} = (\# \text{ LWDI's} \times 200,000) / \# \text{ employee hours worked}$

LWDI = sum of LWDI's in reference years

employee hours worked = sum of employee hours in reference years

200,000 = base for 100 full-time equivalent workers (working 40 hours per week, 50 weeks per year)

When accidents and injuries occur, they have an immediate detrimental impact on those employees involved. Additionally, they have a potential lingering negative impact on our company and our ability to get work.

Postings

There will be a prominently displayed bulletin board or area for postings. Every employee must be aware of this policy. Certain postings are required as a matter of law in all cases and other postings are required depending on circumstances and types of work being done.

In all cases, the following must be posted to meet OSHA requirements:

- a. OSHA Form 3165, It's the law!
- b. During the period from 1 February through to April 30, OSHA Form 300A, Summary of Work-Related Injuries and Illnesses, must be posted for work-related injuries and illnesses which have occurred during the previous year.
- c. Emergency phone numbers and site address for emergency response.

If appropriate, the following must be posted:

- a. OSHA citations.
- b. Notice of informal hearing conference.
- c. Names and location of assigned first aid providers.
- e. Emergency action plan.

Access to Employee Medical Records & Exposure Records

29 CFR 1910.1020 - Access to employee exposure and medical records

All employee exposure records and medical records are under the control of Jake Pritchard, our Safety Program Administrator.

Exposure Records must be retained for 30 years.

Medical Records must be retained for the duration of employment plus 30 years.

An employee's medical record means: "a record concerning the health status of an employee which is made or maintained by a physician, nurse, or other health care personnel, or technician."

This would include:

- a. Medical and employment questionnaires or histories (including job description and occupational exposures).
- b. The results of medical examinations (pre-employment, pre-assignment, periodic, or episodic) and laboratory tests (including chest and other X-ray examinations taken for the purpose of establishing a base-line or detecting occupational illnesses) and all biological monitoring not defined as an "employee exposure record".
- c. Medical opinions, diagnoses, progress notes, and recommendations.
- d. First aid records.
- e. Descriptions of treatments and prescriptions.
- f. Employee medical complaints.

Note: An employee's medical record does not include:

- a. **Physical specimens (e.g., blood or urine samples) which are routinely discarded as a part of normal medical practice.**
- b. **Records concerning health insurance claims if maintained separately from the employer's medical program and its records, and not accessible to the employer by employee name or other direct personal identifier (e.g., social security number, payroll number, etc.).**
- c. **Records created solely in preparation for litigation which are privileged from discovery under the applicable rules of procedure or evidence.**
- d. **Records concerning voluntary employee assistance programs (alcohol, drug abuse, or personal counseling programs) if maintained separately from the employer's medical program and its records.**

An employee's **exposure record** means a record containing any of the following kinds of information:

- a. Environmental (workplace) monitoring or measuring of a toxic substance or harmful physical agent, including personal, area, grab, wipe, or other form of sampling, as well as related collection and analytical methodologies, calculations, and other background data relevant to interpretation of the results obtained.
- b. Biological monitoring results which directly assess the absorption of a toxic substance or harmful physical agent by body systems (e.g., the level of a chemical in the blood, urine, breath, hair, fingernails, etc.) but not including results which assess the biological effect of a substance or agent or which assess an employee's use of alcohol or drugs.

- c. Safety data sheets indicating that the material may pose a hazard to human health.
- d. In the absence of the above, a chemical inventory or any other record which reveals where and when used and the identity (e.g., chemical, common, or trade name) of a toxic substance or harmful physical agent.
- e. Objective Data for Exemption from Requirement for Initial Monitoring.

Employee Information

Upon first entering into employment, and at least annually thereafter, each employee will be informed of the following:

- a. The existence, location, and availability of any records covered by 29 CFR 1910.1020.
- b. The person responsible for maintaining and providing access to records (Oleksii Dudar).
- c. The employee's rights of access to his/her records.
- d. That a copy of 29 CFR 1910.1020 and its appendices will be maintained in Oleksii Dudar's office and made readily available upon request.

Informational materials concerning access to medical records received from or provided by the Assistant Secretary of Labor for Occupational Safety and Health will be distributed to all current employees.

Access to Records

Employees or their designated representatives will have access to their medical or exposure records within 15 working days of their request, or, if this is not possible, Oleksii Dudar will provide, within 15 working days, the reason for the delay and provide a best estimate of when the records will be available.

Copies of employee medical or exposure records will be provided in a reasonable time, place, and manner and **at no cost to the employee**.

Upon request, Oleksii Dudar will provide access to representatives of the Assistant Secretary of Labor for Occupational Safety and Health employee exposure and medical records and to analysis using exposure or medical records.

Analysis Using Medical or Exposure Records

"Analysis using exposure or medical records" means any compilation of data or any statistical study based at least in part on information collected from individual employee exposure or medical records or information collected from health insurance claims records, provided that either the analysis has been reported to the employer or no further work is currently being done by the person responsible for preparing the analysis.

Before access is granted to an analysis using medical or exposure records, all personal identifiers must be removed that could reasonable directly identify the employee. Identifiers would include: name, SSN, address, etc. Identifiers that could indirectly identify the employee will also be removed. These would include date of hire, sex, job title, etc.

Confidentiality

Nothing in the OSHA standards is intended to affect existing legal and ethical obligations concerning the maintenance and confidentiality of employee medical information, the duty to disclose information to a patient/employee or any other aspect of the medical-care relationship, or affect existing legal obligations concerning the protection of trade secret information.

Transfer of Records

Should DFW Moving Company cease to do business, the successor employer will receive and retain all the above medical and exposure records.

Should DFW Moving Company cease to do business and there is no successor employer to receive and retain the above medical and exposure records, they will be transmitted to the Director of the National Institute for Occupational Safety and Health (NIOSH).

At the expiration of the retention period for the above medical records, DFW Moving Company will notify the Director of the NIOSH at least 3 months prior to the disposal of such records and will transmit those records to the Director of the NIOSH if he requests them within that period.

Enforcement

It is expected that all employees will abide by the safety rules and guidelines that DFW Moving Company has in place, not only to protect themselves, but also to protect their fellow workers from harm. If a safety violation occurs, the following steps will be taken by the employee's immediate supervisor:

Minor Safety Violations: Violations which would **not** reasonably be expected to result in serious injury.

- a. The hazardous situation will be corrected.
- b. The employee will be informed of the correct procedures to follow and the supervisor will ensure that these procedures are understood.
- c. The supervisor will make a written report of the occurrence using the Enforcement Documentation Form and inform the employee that this documentation will be forwarded to Oleksii Dudar, our Safety Director, for a retention period of one year.
- d. A repeat occurrence of the same minor safety violation is considered substantially more serious than the first.

Major Safety Violations: Violations which would reasonably be expected to result in serious injury or death.

- a. The hazardous situation will be corrected.
- b. The employee will be informed of the correct procedures to follow and their supervisor will impress upon the individual the severity of the violation and the likely consequences should this type of violation be repeated. The supervisor will ensure that the individual understands the correct procedures and will be cautioned that a reoccurrence could result in disciplinary action up to and including discharge.
- c. The supervisor will make a written report of the occurrence using the Enforcement Documentation Form and inform the employee that this documentation will be forwarded to Oleksii Dudar for a retention period of one year.

Willful Major Safety Violations: Intentional violation of a safety rule which would reasonably be expected to result in serious injury to the employee or a fellow worker.

- a. The hazardous situation will be corrected.
- b. The employee will be removed from the job site, the event will be documented and forwarded to Oleksii Dudar, and the employee will be discharged.

Employees are to understand that the primary purpose of documenting safety violations is to ensure that the important business of employee safety is taken seriously and that the potential for injury is reduced to the lowest possible level.

Schedule of Enforcement Actions
Violations Occurring within a 1 Calendar Year Period

Minor Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	1 Day Off
2nd	Written Notice	2nd	3 Days Off
3rd	1 Day Off	3rd	Dismissal
4th	2 Days Off		
5th	3 Days Off		
6th	Dismissal		

Major Violation

Offense	Action	Repeat of Same Offense	Action
1st	Written Notice	1st	4 Days Off
2nd	2 Days Off	2nd	Dismissal
3rd	4 Days Off		
4th	Dismissal		

DFW Moving Company
Section II
Site/Job Specific Policies and Procedures

Aisles

29 CFR 1910.22 - General Requirements

Permanent aisles and passageways will be clearly marked and kept clear of obstructions. Where mechanical handling equipment is used, sufficient clearance will be provided for aisles, doorways and turns.

Combustible & Flammable Liquid Handling

Only approved containers and portable tanks will be used for storage and handling of flammable and combustible liquids. Approved safety cans or Department of Transportation approved containers will be used for handling and use of flammable liquids in quantities of 5 gallons or less.

Note: The above does not apply to flammable liquid materials which are highly viscid (extremely hard to pour) which may be used and handled in their original shipping containers.

Note: For quantities of one gallon or less, the original container may be used for storage, use and handling.

Flammable or combustible liquids may not be stored in areas used for exits, stairways, or normally used for the safe passage of people.

Inside a facility, no more than 25 gallons of flammable or combustible liquids may be stored in a room outside of an approved storage cabinet.

Gasoline: General Information

Because most persons use or indirectly handle gasoline on a regular basis – from filling up automobiles to lawn mowers – the hazards presented by this product may have become obscure. Just because you are familiar with gasoline, never lose sight of the lethal hazards that it may contain.

Gasoline is a flammable liquid which means it has a flash point of less than 100°F. The actual flash point – lowest temperature at which a liquid gives off enough vapor to form a flammable mixture with air – of gasoline is -45°F. The auto-ignition temperature – the temperature at which, with sufficient oxygen, gasoline will ignite on its own and burn – is 536°F.

Gasoline has a specific gravity – the weight of the gasoline compared to the weight of an equal volume of water – of 0.73. Further, gasoline has a negligible solubility in water. Basically, what the above means is that if water is used to extinguish a gasoline fire, it will only spread it because the gasoline will float on the water and continue to give off a vapor and form a flammable mixture with air. Gasoline fires must be fought with an extinguisher that is rated for Class B fires such as carbon dioxide, dry chemical, or foam. It should be noted that water spray may be used to cool containers that may be exposed to the heat of the fire to prevent an explosion.

Conditions to Avoid: heat, flame, & sources of ignition

Materials to Avoid: strong oxidizers

Health Hazard Information: routes of entry: inhalation, skin, ingestion

Signs & Symptoms of Overexposure: headache, nausea, drowsiness, breathlessness, fatigue, convulsions, loss of consciousness, dermatitis

If there is a spill, notify emergency response personnel, evacuate area, remove ignition sources, and build a dike to contain flow – do not flush to sewer or open water. Pick up with inert absorbent and place in closed container for disposal.

Gasoline is a carcinogen – a cancer causing agent.

General Rules: Post “No Smoking” signs around gasoline storage and ensure that it is enforced. Use only approved plastic or metal containers for portable gasoline carriers. They must not contain more than 5 gallons.

Double check with local ordinances for storage requirements.

Company Vehicles

Note: The below applies only to employees who DO NOT operate a commercial motor vehicle (CMV) in interstate or intrastate commerce.

Only authorized employees may operate, in the course of their work, any company-owned motor vehicle.

Prior to authorization, the employee must possess a valid and current license to operate the vehicle. Oleksii Dudar, our Safety Director, or authorized representative, will ensure that the employee has demonstrated his/her ability to operate the motor vehicle in a safe and competent manner.

Under no circumstances may any motor vehicle be operated under the influence of alcohol, illegal drugs, or prescription or over-the-counter drugs medications that may impair their driving skills.

When driving over the road vehicles, employees will ensure that the vehicle registration and proof of insurance is within the vehicle. In the event of an accident, Oleksii Dudar will be notified **immediately** after all potential injuries are addressed and a police report is filled out. Employees must report all traffic violations to Oleksii Dudar and they (employees) are responsible for paying all penalties imposed by law.

Loads in vans and trucks will be properly secured (strapped or blocked) to prevent any shift or movement and care will be taken to not exceed the vehicles weight limits.

All company motor vehicles will be maintained in safe operating condition and in accordance with the manufacturer's recommended maintenance schedule.

Before use, a walk around inspection will be performed by the operator checking tires (tread depth and pressure), glass (chips and cracks), horn and lights, and general vehicle condition. **No vehicle will be operated that is not in safe mechanical condition.**

It is expected that the below safe vehicle operation/driving procedures will be followed at all times:

- a. Seat belts will be worn by all occupants at all times while the vehicle is in motion
- b. Safe distance (one vehicle length per 10 MPH) will be maintained
- c. Posted speed limits will not be exceeded
- d. During fuel stops, all fluids will be checked, and the windows, headlights and taillights will be cleaned
- e. Constant attention will be maintained by always being aware of road conditions and surrounding vehicles

Note: Unnecessary distractions will not be permitted such as using hands to dial or receive cell phone calls or changing radio stations while the vehicle is in motion.

- f. Before backing up any vehicle, check behind and blow horn for the safety of others.

Compressed Air

29 CFR 1910.101 - Compressed gases (general requirements)

29 CFR 1910.242 - Hand and Portable Powered Tools and Other Hand-Held Equipment

29 CFR 1910.169 - Air Receivers

Prior to using compressed air, employees will receive training in:

- a. Safe use of compressed air.
- b. Pneumatic power tools.
- c. Inspection of compressed gas cylinders

Safe Use of Compressed Air:

The below applies to compressed air receivers, and other equipment used in providing and utilizing compressed air for performing operations such as cleaning, drilling, hoisting, and chipping.

- a. Air receivers will be so installed that all drains, handholes, and manholes therein are easily accessible. Under no circumstances will an air receiver be buried underground or located in an inaccessible place.
- b. A drain pipe and valve will be installed at the lowest point of every air receiver to provide for the removal of accumulated oil and water. Adequate automatic traps may be installed in addition to drain valves. The drain valve on the air receiver will be opened and the receiver completely drained frequently and at such intervals as to prevent the accumulation of excessive amounts of liquid in the receiver.
- c. Every air receiver will be equipped with an indicating pressure gauge (so located as to be readily visible) and with one or more spring-loaded safety valves. The total relieving capacity of such safety valves will be such as to prevent pressure in the receiver from exceeding the maximum allowable working pressure of the receiver by more than 10 percent.
- d. No valve of any type will be placed between the air receiver and its safety valve or valves.
- e. Safety appliances, such as safety valves, indicating devices and controlling devices, will be constructed, located, and installed so that they cannot be readily rendered inoperative by any means, including the elements.
- f. All safety valves will be tested frequently and at regular intervals to determine whether they are in good operating condition.

Compressed Gas Cylinders

29 CFR 1910-253 - Oxygen-Fuel Gas Welding and Cutting

Compressed Gas Cylinders Use

Compressed gas cylinders are used at many workplaces – the most common being oxygen and acetylene for welding.

Failure to follow basic safety procedures could result in serious injuries such as:

- a. Flash burn – due to explosion.
- b. Fragment impalement – due to explosion.
- c. Compression of the foot – due to mishandling of tanks.
- d. Inhalation of hazardous gases – due to leakage.

Basic safety procedures for compressed gas cylinders:

- a. Cylinders must remain upright and chained to a substantial support or cart when in use.
- b. Wear appropriate personal protective equipment for the job – such as steel toed shoes, apron, goggles, gloves, helmet, etc.
- c. Read and understand the SDS for the gas being used and know the location of the SDS in case of an emergency.
- d. Have appropriate fire extinguisher readily available
- e. To release the gas, open the cylinder valve slowly – standing away from the face and back of the gage – and leave the opening tools in place (on the valve stem) for quick shut-off in the event of an emergency.
- f. Ensure cylinder valves, regulators, couplings, and hose are free of oil and grease and ensure all connections are tight.
- g. When using oxygen-fuel systems, use flashback arrestors and reverse-flow check valves to prevent flashback.
- h. Keep cylinders away from open flames and sources of heat.
- i. Cylinders are never allowed in confined spaces.
- j. Do not alter or attempt to repair safety devices or valves.
- k. Remove the regulators when: a) moving cylinders; b) work is completed; and c) cylinders are empty.
- l. Take care to prevent combustible materials from exposure to welding or cutting operations.

Inspection of Compressed Gas Cylinders:

We will determine that compressed gas cylinders under the control of DFW Moving Company are in a safe condition to the extent that this can be determined by visual inspection. Visual & other inspections will be conducted as prescribed in the Hazardous Materials Regulations of the Department of Transportation (49 CFR parts 171-179 & 14 CFR part 103).

Where those regulations are not applicable, visual and other inspections will be conducted in accordance with Compressed Gas Association Pamphlets C-6-1968 and C-8-1962, which is incorporated by reference as specified in Sec. 1910.6.

Note: Compressed gas cylinders, portable tanks, and cargo tanks will have pressure relief devices installed and maintained in accordance with Compressed Gas Association Pamphlets S-1.1-1963 and 1965 addenda and S-1.2-1963, which is incorporated by reference as specified in Sec. 1910.6.

Training

All employees who use compressed gas cylinders will be trained in their proper storage, handling, and use.

Specific requirements for compressed gas cylinder use include:

- a. Compressed gas cylinders will be clearly marked to identify the gas contained therein. Gas identification must be stamped or stenciled on the gas cylinder or a label affixed. No gas cylinder will be accepted for use that does not legibly identify its content by name.
- b. Visual or other inspections will be performed by the competent person on site to ensure the compressed gas cylinders are in a safe condition.
- c. Compressed gas cylinders will be inspected to ensure they are equipped with the correct regulator. Before use, regulators and cylinder valves will be inspected to ensure they are free from oil, dirt, and solvents.
- d. Compressed gas cylinders will have valve protectors in place when not in use or connected for use.
 1. When a cylinder cap cannot be removed by hand, the cylinder will be tagged "Do Not Use" and returned to the designated storage area for return to the vendor.
- e. The user of the compressed gas cylinders will use only the tools supplied by the provider to open and close cylinder valves.
- f. Valves will be closed before the cylinder is moved, when the cylinder is empty, and at the completion of each job.
- g. Leaking cylinders will be moved to an isolated, well-ventilated area, away from ignitions sources.

Note: Soapy water will be used to detect the exact location of the leak. If the leak is at the junction of the cylinder valve and cylinder, do not attempt to repair it. The supplier will be contacted and asked for proper response instructions.
- h. Gasses may never be mixed in a cylinder. Only professionals may refill gas cylinders.
- i. Hoses and connections will be inspected regularly for damage. Hoses should be stored in cool areas and protected from damage.

Transportation of Compressed Gas Cylinders

- a. Compressed gas cylinders must be transported in a vertical secured position using a cylinder basket or cart.
- b. Regulators should be removed, and cylinders capped before movement.
- c. Cylinders may never be rolled. Cylinders should not be dropped or permitted to strike violently.
- d. Protective caps are not to be used to lift cylinders.

Compressed Gas Cylinders Storage

- a. Cylinders must be secured at all times in such a way as to avoid them being knocked over or damaged. They must be stored in a vertical position. They must be segregated based on contents. 20 feet should be maintained between oxidizers and flammables or firewalls erected at least 5 feet high with a fire rating of 30 minutes.
- b. Cylinders must be protected from damage, corrosion, sunlight.
- c. Cylinders must be stored in well protected, well ventilated, dry locations away from sunlight. Cylinders will never be kept in unventilated enclosures such as lockers or cupboards.
- d. Cylinders must be stored away from stairs, elevators, and gangways.
- e. Clearly designated and labeled separate storage area will be provided for full and empty cylinders.
- f. Empty cylinders that are no longer needed must be marked as "MT" and dated when empty. Empty cylinders must be handled as carefully as full cylinders.
- g. Cylinders will be capped when they are not being used.

Disposable Respirators

OSHA requires that employees who voluntarily use disposable respirators in situations where respiratory protection is not specifically required by OSHA standard (in atmospheres where exposures are below the permissible exposure limit) essentially for personal comfort or additional, though not required, respiratory protection be informed of 29 CFR 1910.134 Appendix D, printed below.

Standard Number: 1910.134 App D

Standard Title: (Mandatory) Information for Employees Using Respirators When Not Required Under Standard.

Respirators are an effective method of protection against designated hazards when properly selected and worn. Respirator use is encouraged, even when exposures are below the exposure limit, to provide an additional level of comfort and protection for workers. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If your employer provides respirators for your voluntary use, or if you provide your own respirator, you need to take certain precautions to be sure that the respirator itself does not present a hazard. You should do the following: 1. Read and heed all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirators limitations. 2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. It will tell you what the respirator is designed for and how much it will protect you. 3. Do not wear your respirator into atmospheres containing contaminants for which your respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect you against gases, vapors, or very small solid particles of fumes or smoke. 4. Keep track of your respirator so that you do not mistakenly use someone else's respirator.

[63 FR 1152, Jan. 8, 1998; 63 FR 20098, April 23, 1998]

All disposable respirators, such as Moldex, 3M, Wilson, North Safety, etc. must be marked with the manufacturer's name, the part number, the protection provided by the filter, and "NIOSH".

Disposable filters are actually negative pressure respirators. They protect the user by filtering particles out of the air breathed.

Though disposable filters cannot be fit-tested in the traditional sense, they must be fit-tested in accordance with the manufacturer's instructions.

Dockboards

The employer must ensure that each dockboard used meets the requirements of this section. The employer must ensure:

- a. Dockboards are capable of supporting the maximum intended load in accordance with §1910.22(b);

Dockboards that are put into initial service on or after January 17, 2017 must be designed, constructed, and maintained to prevent transfer vehicles from running off the dockboard edge.

Exception: When the employer demonstrates there is no hazard of transfer vehicles running off the dockboard edge, the employer may use dockboards that do not have run-off protection.

- b. Portable dockboards are secured by anchoring them in place or using equipment or devices that prevent the dockboard from moving out of a safe position. When the employer demonstrates that securing the dockboard is not feasible, the employer must ensure there is sufficient contact between the dockboard and the surface to prevent the dockboard from moving out of a safe position;
- c. Measures, such as wheel chocks or sand shoes, are used to prevent the transport vehicle (e.g. a truck, semi-trailer, trailer, or rail car) on which a dockboard is placed, from moving while employees are on the dockboard.
- d. Portable dockboards are equipped with handholds or other means to permit safe handling of dockboards.

Electrical Work - Workplace Safety

[29 CFR 1910.305 - Wiring methods, components, and equipment for general use](#)

[29 CFR 1910.332 - Training](#)

[29 CFR 1910.333 - Selection and use of work practices](#)

[29 CFR 1910.334 - Use of equipment](#)

No electrical work will be performed on electric distribution circuits or equipment, except by a qualified person or by a person trained to perform electrical work and to maintain electrical equipment under the direct supervision of a qualified person. Disconnecting devices will be locked out and suitably tagged by the persons who perform such work, except that in cases where locking out is not possible, such devices will be opened and suitably tagged by such persons. Locks or tags will be removed only by the persons who installed them or, if such persons are unavailable, by persons authorized by the operator or his agent.

Only qualified or trained personnel may perform electrical work.

All electrical work will be done according to the latest adopted National Electrical Code as well as established local codes.

Only qualified persons may work on electric circuit parts or equipment that has not been de-energized. These persons must be made familiar with the use of special precautionary techniques, PPE, insulating & shielding materials and insulated tools.

Note: When dealing with safety related work practices to prevent electric shock or other injuries resulting from either direct or indirect electrical contacts, a Qualified Person is defined as one who: "is permitted to work on or near exposed energized parts" and who, at a minimum, has been trained in and is familiar with:

- a. The skills and techniques necessary to distinguish exposed live parts from other parts of electric equipment, and
- b. The skills and techniques necessary to determine the nominal voltage of exposed live parts, and
- c. The clearance distances specified in 29 CFR 1910.333(c) and the corresponding voltages to which the qualified person will be exposed

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).

Note: When an unqualified person is working overhead lines, the location will 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
For voltages to ground over 50kV	10 feet plus 4 inches for every 10kV over 50kV.

Note: 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 above.

Electrical Safety Measures:

- a. Daily, prior to use, all electrical equipment – including extension cords – will be inspected and defective items will be tagged out of service and not used.
- b. With the exception of double insulated tools (with UL approval), all electrical tools and equipment will be grounded.
- c. Tools will not be hoisted by their flexible electrical cords.
- d. Except in an emergency, load rated switches and circuit breakers will be used for the opening and closing of circuits under load conditions as opposed to fuses and splice connections.
- e. While working on electrical equipment, unauthorized persons will be kept clear by barriers or other means of guarding.
- f. Temporary wiring and extension cords will be kept off of walking working surfaces & vehicle traffic areas or covered to prevent tripping & vehicle damage.
 1. Electrical cords will not be suspended with staples, hung from nails, or suspended by wire.
 2. Worn or frayed electric cords or cables will not be used.
- g. Hands will be dry when working on electrical equipment including plugging in extension cords.
- h. When working around any electrical power circuit, employees will:
 1. Protect themselves by de-energizing the circuit and grounding it or by establishing insulation between themselves and the current.
 2. Ensure that any conductive materials and equipment that are in contact with any part of their body will be handled in a manner that will preclude contact with exposed energized conductors or circuit parts.
 3. Use portable ladders that have non-conductive siderails.
 4. Remove or insulate conductive articles of jewelry and clothing that might contact exposed energized parts.
- i. Only qualified persons may perform testing work on electric circuits or equipment.
- j. Sufficient access and working space must be maintained about all electric equipment to permit ready and safe operation and maintenance. This space must be kept clear, i.e., it cannot be used for storage.
- k. Portable ladders must have non-conductive side rails.
- l. Conductive items of jewelry or clothing must not be worn around electricity unless rendered non-conductive by covering, wrapping, or other insulating means.

Ground Fault Circuit Interrupters

A ground fault circuit interrupter (GFCI) provides protection for all 120-volt, 15-, 20-, and 30-ampere receptacle outlets that are not a part of the permanent wiring by detecting lost current resulting from a short, overheating, and/or ground fault. It should be noted that an extension cord into which electrical devices are plugged are not part of the permanent wiring; therefore, GFCI's are required.

A GFCI will "trip" when the amount of current amperes going to an electrical device in the hot conductor and the amount of current returning from an electrical device differs by approximately 5 milliamps. The GFCI can interrupt the current within as little as 1/40th of a second.

The current that is missing is being lost through a ground fault, whether it is in the actual grounding, a short in the equipment, or electricity going through the employee to the ground.

A GFCI will not protect an employee who comes in contact with two hot wires or a hot wire and a neutral wire. A GFCI will provide protection against fires, overheating, damage to insulation, and, the most common form of electrical shock hazard -- the ground fault. GFCI's must be tested before use.

Extension Cords

Extension cords (temporary wiring), temporary electrical power, and lighting installations of 600 volts, nominal, or less may be used only as follows:

- a. during and for remodeling, maintenance, or repair of buildings, structures, or equipment, and similar activities.
- b. for a period not to exceed 90 days for Christmas decorative lighting and similar purposes.
- c. during emergencies.

Temporary wiring will be removed immediately upon completion of the project or purpose for which the wiring was installed.

Extension cords will not replace permanent wiring and the following safety precautions will be adhered to:

- a. Extension cords will be kept off of walking working surfaces or be covered to prevent tripping. Cords will not be placed in vehicle traffic lanes.
- b. Electrical cords will not be suspended with staples, hung from nails, or suspended by wire.
- c. Worn or frayed electric cords or cables will not be used.

Prior to using an extension cord, an employee must:

- a. Inspect the cord for cracks and cuts and a defective cord will be tagged and removed from service.
- b. Ensure the cord has a three prong plug for grounding.
- c. Use the shortest continuous length of cord possible. Cords may not be spliced together.
- d. Make certain the cord does not lay in water.
- e. Ensure cord is properly rated for the job.

Fixed Industrial Stairs

Fixed industrial stairs includes interior and exterior stairs around machinery, tanks, and other equipment, and stairs leading to or from floors, platforms, or pits. It does not apply to stairs used for fire exit purposes, to construction operations to private residences, or to articulated stairs, such as may be installed on floating roof tanks or on dock facilities, the angle of which changes with the rise and fall of the base support.

Fixed stairs will be provided for access from one structure level to another where operations necessitate regular travel between levels, and for access to operating platforms at any equipment which requires attention routinely during operations.

Fixed stairs will also be provided where access to elevations is daily or at each shift for such purposes as gauging, inspection, regular maintenance, etc., where such work may expose employees to acids, caustics, gases, or other harmful substances, or for which purposes the carrying of tools or equipment by hand is normally required.

Spiral stairways will not be permitted except for special limited usage and secondary access situations where it is not practical to provide a conventional stairway. Winding stairways may be installed on tanks and similar round structures where the diameter of the structure is not less than five (5) feet.

Hand Trucks

Hand trucks will be loaded with the heaviest items on the bottom. Before actually moving a hand truck, ensure the load is steady and unable to shift. If necessary, the load will be strapped to the hand truck to prevent shifting.

Hand trucks should be loaded so that the weight of the load will be over the axles to the extent possible when in motion.

Hand trucks should be selected by taking into consideration the size of the load, the weight of the load, and the surface on which it is being used. Hard wheels roll well on hard surfaces and soft wheels roll better on soft surfaces. Do not exceed a hand truck's capacity. If the hand truck has pneumatic tires, ensure they are inflated to their proper pressure.

When using a ramp, the hand truck should be in front of you when going down and behind you when going up.

Ensure clear vision – do not stack above your line of sight. If circumstances require that a large item does hinder line of sight or the item is possibly unstable in spite of using straps, a second truck operator will be used.

Hand trucks should be stored with the tongues under a pallet or table when not in use.

Hazardous Workplace Chemical Exposure

Our employees may encounter various hazardous chemicals while performing their work duties. If employees have been properly trained on a particular hazard, they may continue work as required. If employees have not been trained on the hazard they encounter, they are to stop work immediately and notify their supervisor.

Per *Hazard Communication*, located at **29 CFR 1910.1200**, DFW Moving Company will keep on site, and readily available SDS for each chemical to which we may be exposed. This information will be provided by the facility operator.

Asbestos Awareness

NIOSH Pocket Guide to Chemical Hazards - Asbestos

At some facilities, employees may have potential exposure to asbestos if precautionary steps noted below are not taken. Asbestos can be found in older tile flooring, pipe and mechanical insulation, plaster, fireproofing, soundproofing, roofing materials, and in sprayed-on materials located on beams, in crawl spaces, and between walls. Undisturbed, it is perfectly safe.

Asbestos is not a specific mineral, but rather a fibrous form of various minerals. It is a remarkable product because it is resistant to corrosive chemicals, it is a nonconductor of electricity, it has a high tensile strength (equal to that of steel wire) and is resistant to heat (it will not burn but will disintegrate at extremely high temperatures). Some forms of asbestos, such as chrysotile, can be spun into thread. In fact, one pound of chrysotile can produce 30,000 feet of thread -- it is that fine. Other types of asbestos have fibers which cannot be spun but are excellent for their frictional properties (brakes) and their insulation and sound deadening properties. The actual minerals found in asbestos include iron, magnesium, silica, and water. Asbestos is a truly remarkable product which has been serving mankind since the ancient Greeks and Romans.

Unfortunately, asbestos has a downside that has been discovered and statistically documented in recent years – it is hazardous to your health.

There are two types of asbestos, friable and non-friable.

Friable asbestos can be crumpled with hand pressure and is likely to emit minute fibers can cause serious long-term health effects. Fluffy sprayed-on materials used for fireproofing, insulation, or sound proofing are considered to be friable.

Non-friable asbestos, undisturbed, poses no health risk. Vinyl-asbestos floor tile or roofing felt are considered non-friable if intact and generally do not emit airborne fibers unless subjected to sanding, sawing and other aggressive operations.

Asbestos-cement pipe or sheet can emit airborne fibers if the materials are cut or sawed, or if they are broken.

The health hazards associated with asbestos are caused by the microscopic fibers which, when released, enter the deepest portion of the lung (past your natural defenses such as hairs, mucus, cilia, and macrophages). Scar tissues can develop, and the lung stiffens thus reducing gas exchange. This is called asbestosis. Another disease associated with asbestos is lung cancer. High exposure levels of asbestos increase one's chance of lung cancer by a factor of five. Mesothelioma, a disease caused primarily by exposure to amosite and crocidolite, can be fatal. Lastly, though not likely, it is possible to get cancer of the stomach and colon.

The health hazards associated with asbestos are chronic and, as such, present themselves after a long period of time.

Asbestos Awareness Training is required for all employees who work in areas that contain or may contain asbestos. This training will be documented.

Steps to avoid asbestos exposure:

- a. Under no circumstances will asbestos containing material (ACM) or presumed asbestos containing material (PACM) be disturbed during work activities.
- b. If you believe the materials you will be working with contain asbestos, do not disturb the material and contact your supervisor.
- c. Obey all asbestos warning signs & labels. ACM and PACM will not be disturbed.
- d. All exposure to thermal system insulation, sprayed-on, and troweled-on surfacing material will be assumed to be asbestos exposure unless results of laboratory analysis show that the material does not contain asbestos.

For the record, permissible exposure to airborne asbestos fibers may not exceed 0.1 fibers per cubic centimeter of air (0.1 f/cc) averaged over the 8-hour workday, and 1 fiber per cubic centimeter of air (1.0 f/cc) averaged over a 30-minute work period.

Crystalline Silica Awareness

Silica, Crystalline (Respirable Size), National Institute of Health

Crystalline Silica can be readily found at many workplaces in rocks, as well as many concrete and masonry products. Crystalline Silica can be released in the air when employees are performing such tasks as:

- a. Chipping, hammering, drilling, crushing, or hauling rock.
- b. Abrasive blasting.
- c. Sawing, hammering, drilling, or sweeping concrete or masonry.

Unprotected respiratory exposure to crystalline silica may cause a lung disease called silicosis as well as cancer and death.

Occupational silica exposure is completely preventable through employee training, use of a silica substitute, use of engineering controls, improved work practices, and, lastly, use of personal protective equipment.

Employees who are potentially exposed to an environment containing airborne concentrations of silica will receive training prior to working with silica and receive periodic refresher training after work has started.

Employee Information and Training

We will ensure that at least the following hazards are addressed: Cancer, lung effects, immune system effects, and kidney effects.

Additionally, we must ensure that our employees can demonstrate knowledge and understanding of at least the following:

- a. The health hazards associated with exposure to respirable crystalline silica;
Silicosis is caused by exposure to respirable crystalline silica dust. Crystalline silica is a basic component of soil, sand, granite, & most other types of rock, & it is used as an abrasive blasting agent. Silicosis is a progressive, disabling, & often fatal lung disease. Cigarette smoking adds to the lung damage caused by silica.
Silicosis (especially the acute form) is characterized by shortness of breath, fever, and cyanosis (bluish skin); it may often be misdiagnosed as pulmonary edema (fluid in the lungs), pneumonia, or tuberculosis. Severe mycobacterial or fungal infections often complicate silicosis and may be fatal in many cases.

Three types of Silicosis:

Chronic Silicosis:	Usually occurs after 10 or more years of exposure to crystalline silica at relatively low concentrations
Accelerated Silicosis:	Results from exposure to high concentrations of crystalline silica and develops 5 to 10 years after the initial exposure.
Acute Silicosis:	Occurs where exposure concentrations are the highest and develops after a few months or as long as 2 years following exposures to extremely high concentrations of respirable crystalline silica.

- b. Specific tasks in the workplace from Table 1 that could result in exposure to respirable crystalline silica;
- c. Specific measures we have implemented to protect employees from exposure to respirable crystalline silica, including engineering controls, work practices, and respirators to be used;
Engineering controls would include local exhaust ventilation, blasting cabinets, and establishing a clearly identified exposure area.
Work practice controls would include use of water sprays, wet methods for cutting, chipping, drilling, sawing, grinding, etc.
Eating, drinking, or smoking near crystalline silica dust is prohibited.
Employees will wash hands and face before eating, drinking or smoking away from silica exposure area.
Personal protective equipment would include appropriate half-face or full-face respirator.
- d. The contents of 29 CFR 1910.1053;
- e. The purpose and a description of the medical surveillance program required by paragraph (i) of 29 CFR 1910.1053.

We will make a copy of 29 CFR 1910.1053 readily available and without cost to our employees covered by this program.

NIOSH Safety Recommendations:

NIOSH recommends the following measures to reduce crystalline silica exposures at the workplace and prevent silicosis and silicosis-related deaths:

- a. Prohibit silica sand (or other substances containing more than 1% crystalline silica) as an abrasive blasting material and substitute less hazardous materials.
- b. Conduct air monitoring to measure worker exposures.
- c. Use containment methods such as blast-cleaning machines and cabinets to control the hazard and protect adjacent workers from exposure.
- d. Practice good personal hygiene to avoid unnecessary exposure to silica dust.
 - 1. Wash hands and face before eating.
 - 2. No eating, drinking or tobacco products in the blasting area.
 - 3. Shower before leaving work site.
 - 4. Vehicles parked away from contaminated area.

- e. Wear washable or disposable protective clothes at the workplace; shower and change into clean clothes before leaving the workplace to prevent contamination of cars, homes, and other work areas.
- f. Use respiratory protection when source controls cannot keep silica exposures below the NIOSH REL.
- g. Provide periodic medical examinations for all workers who may be exposed to crystalline silica.
- h. Post signs to warn workers about the hazard and to inform them about required protective equipment.
- i. Provide workers with training that includes information about health effects, work practices, and protective equipment for crystalline silica.
- j. Report all cases of silicosis to the state health department.

Lead Hazard Awareness:

Pure lead (Pb) is a heavy metal at room temperature and pressure and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

OSHA standard **29 CFR 1910.1025 - Lead**, addresses occupational exposure to lead in the construction industry. The word "lead" within this standard refers to elemental lead, all inorganic lead compounds, and a class of organic lead compounds called lead soaps. This standard does not apply to other organic lead compounds.

There may be times when employees are working within the vicinity of lead or lead-containing materials.

Under no circumstances will employees be exposed to lead above the action level which, for lead, is 30 micrograms of lead per cubic meter of air (30 μm^3), averaged over an 8-hour workday. As a matter of interest, the permissible exposure limit (PEL) for lead is 50 micrograms of lead per cubic meter of air (50 μm^3), averaged over an 8-hour workday.

Lead found in paints, coatings, and compounds that are undisturbed, pose no risk of hazard exposure and work around these items do not require respirators, special clothing, or negative pressure enclosures.

Care will be taken by all employees to not abrade, remove, touch, or in any way disturb lead or lead containing compounds within the work area.

To drive home the point of the importance of leaving lead at the workplace undisturbed and avoided, employees must be aware of the health hazards associated with lead exposure.

The below is extracted from 29 CFR 1910.1025 App A, *Substance data sheet for occupational exposure to lead:*

II. HEALTH HAZARD DATA

A. "Ways in which lead enters your body". When absorbed into your body in certain doses, lead is a toxic substance. The object of the lead standard is to prevent absorption of harmful quantities of lead. The standard is intended to protect you not only from the immediate toxic effects of lead, but also from the serious toxic effects that may not become apparent until years of exposure have passed. Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating). Lead (except for certain organic lead compounds not covered by the standard, such as tetraethyl lead) is not absorbed through your skin.

When lead is scattered in the air as a dust, fume, or mist it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion. A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood stream, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole-body systems.

B. "Effects of overexposure to lead" - (1) "Short term (acute) overexposure". Lead is a potent, systemic poison that serves no known useful function once absorbed by your body. Taken in large enough doses, lead can kill you in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. A short-term dose of lead can lead to acute encephalopathy. Short term occupational exposures of this magnitude are highly unusual, but not impossible. Similar forms of encephalopathy may, however, arise from extended, chronic exposure to lower doses of lead. There is no sharp dividing line between rapidly developing acute effects of lead, and chronic effects which take longer to acquire. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years.

(2) "Long-term (chronic) overexposure". Chronic overexposure to lead may result in severe damage to your blood - forming, nervous, urinary and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic. In lead colic there may be severe abdominal pain. Damage to the central nervous system in general and the brain (encephalopathy) in particular is one of the most severe forms of lead poisoning. The most severe, often fatal, form of encephalopathy may be preceded by vomiting, a feeling of dullness progressing to drowsiness and stupor, poor memory, restlessness, irritability, tremor, and convulsions. It may arise suddenly with the onset of seizures, followed by coma, and death. There is a tendency for muscular weakness to develop at the same time. This weakness may progress to paralysis often observed as a characteristic "wrist drop" or "foot drop" and is a manifestation of a disease to the nervous system called peripheral neuropathy. Chronic overexposure to lead also results in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred. Routine laboratory tests reveal the presence of this kidney disease only after about two-thirds of kidney function is lost. When overt symptoms of urinary dysfunction arise, it is often too late to correct or prevent worsening conditions, and progression to kidney dialysis or death is possible. Chronic overexposure to lead impairs the reproductive systems of both men and women. Overexposure to lead may result in decreased sex drive, impotence and sterility in men. Lead can alter the structure of sperm cells raising the risk of birth defects. There is evidence of miscarriage and stillbirth in women whose husbands were exposed to lead or who were exposed to lead themselves. Lead exposure also may result in decreased fertility, and abnormal menstrual cycles in women.

The course of pregnancy may be adversely affected by exposure to lead since lead crosses the placental barrier and poses risks to developing fetuses. Children born of parents either one of whom were exposed to excess lead levels are more likely to have birth defects, mental retardation, behavioral disorders or die during the first year of childhood. Overexposure to lead also disrupts the blood - forming system resulting in decreased hemoglobin (the substance in the blood that carries oxygen to the cells) and ultimately anemia. Anemia is characterized by weakness, pallor and fatigability as a result of decreased oxygen carrying capacity in the blood.

(3) "Health protection goals of the standard". Prevention of adverse health effects for most workers from exposure to lead throughout a working lifetime requires that a worker's blood lead level (BLL, also expressed as PbB) be maintained at or below forty micrograms per deciliter of whole blood (40 ug/dl). The blood lead levels of workers (both male and female workers) who intend to have children should be maintained below 30 ug/dl to minimize adverse reproductive health effects to the parents and to the developing fetus. The measurement of your blood lead level (BLL) is the most useful indicator of the amount of lead being absorbed by your body. Blood lead levels are most often reported in units of milligrams (mg) or micrograms (ug) of lead (1 mg=1000 ug) per 100 grams (100g), 100 milliliters (100 ml) or deciliter (dl) of blood. These three units are essentially the same. Sometime BLLs are expressed in the form of mg percent or ug percent. This is a shorthand notation for 100g, 100 ml, or dl. (References to BLL measurements in this standard are expressed in the form of ug/dl.)

BLL measurements show the amount of lead circulating in your blood stream, but do not give any information about the amount of lead stored in your various tissues. BLL measurements merely show current absorption of lead, not the effect that lead is having on your body or the effects that past lead exposure may have already caused. Past research into lead - related diseases, however, has focused heavily on associations between BLLs and various diseases. As a result, your BLL is an important indicator of the likelihood that you will gradually acquire a lead - related health impairment or disease.

Once your blood lead level climbs above 40 ug/dl, your risk of disease increases. There is a wide variability of individual response to lead, thus it is difficult to say that a particular BLL in a given person will cause a particular effect. Studies have associated fatal encephalopathy with BLLs as low as 150 ug/dl. Other studies have shown other forms of diseases in some workers with BLLs well below 80 ug/dl. Your BLL is a crucial indicator of the risks to your health, but one other factor is also extremely important. This factor is the length of time you have had elevated BLLs. The longer you have an elevated BLL, the greater the risk that large quantities of lead are being gradually stored in your organs and tissues (body burden). The greater your overall body burden, the greater the chances of substantial permanent damage. The best way to prevent all forms of lead - related impairments and diseases -- both short term and long term -- is to maintain your BLL below 40 ug/dl. The provisions of the standard are designed with this end in mind.

Ladders

29 CFR 1910.23 Ladders

29 CFR 1910.24 Step Bolts and Manhole Steps

All employees using ladders are required by OSHA standards to receive training and understand proper procedures for ladder use before using a ladder in a work situation.

American National Standards Institute (ANSI) and **NIOSH** approval labels should never be covered with paint or tape. Having ladders that are constructed to standard will prevent collapse and resultant falls.

The following general requirements apply to all ladders:

- a. Ladder rungs, steps, and cleats must be parallel, level, and uniformly spaced when a ladder is in position for use.
- b. Ladder rungs, steps, and cleats must not be spaced less than 10 inches (25 cm) and not more than 14 inches (36 cm) apart, as measured between the centerlines of the rungs, cleats, and steps.

Exceptions: Ladder rungs and steps in elevator shafts must be spaced not less than 6 inches (15 cm) apart and not more than 16.5 inches (42 cm) apart, as measured along the ladder side rails; and

Fixed ladder rungs and steps on telecommunication towers must be spaced not more than 18 inches (46 cm) apart, measured between the centerlines of the rungs or steps.

- c. Steps on stepstools must not be spaced less than 8 inches (20 cm) apart and not more than 12 inches (30 cm) apart, as measured between the centerlines of the steps.
- d. Ladder rungs, steps, and cleats must have a minimum clear width of 11.5 inches (29 cm) on portable ladders and 16 inches (41 cm) (measured before installation of ladder safety systems) for fixed ladders.

Exceptions: 1. The minimum clear width does not apply to ladders with narrow rungs that are not designed to be stepped on, such as those located on the tapered end of orchard ladders and similar ladders;

2. Rungs and steps of manhole entry ladders that are supported by the manhole opening must have a minimum clear width of 9 inches (23 cm);

3. Rungs and steps on rolling ladders used in telecommunication centers must have a minimum clear width of 8 inches (20 cm); and

4. Stepstools must have a minimum clear width of 10.5 inches (26.7 cm).

- e. Wooden ladders must not be coated with any material that may obscure structural defects.
- f. Metal ladders must be made with corrosion-resistant material or protected against corrosion.
- g. Ladder surfaces must be free of puncture and laceration hazards.
- h. Ladders must only be used for the purposes for which they were designed.
- i. Ladders must be inspected before initial use in each work shift, and more frequently as necessary, to identify any visible defects that could cause employee injury.
- j. Any ladder with structural or other defects must be immediately tagged "Dangerous: Do Not Use" or with similar language in accordance with **§1910.145** and removed from service until repaired in accordance with **§1910.22(d)** or replaced.

- k. Each employee must face the ladder when climbing up or down it.
- l. Each employee must use at least one hand to grasp the ladder when climbing up and down it.
- m. No employee should carry any object or load that could cause the employee to lose balance and fall while climbing up or down the ladder.

The following additional requirements apply to the use of portable ladders:

- a. Rungs and steps of portable metal ladders must be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize the possibility of slipping.
- b. Each stepladder or combination ladder used in a stepladder mode must be equipped with a metal spreader or locking device that securely holds the front and back sections in an open position while the ladder is in use.
- c. Ladders must not be loaded beyond the maximum intended load.
Note: The maximum intended load, as defined in §1910.21(b), includes the total load (weight and force) of the employee and all tools, equipment, and materials being carried.
- d. Ladders are to be used only on stable and level surfaces unless they are secured or stabilized to prevent accidental displacement.
- e. Portable single rail ladders are prohibited.
- f. A ladder must not be moved, shifted, or extended while an employee is on it.
- g. Ladders placed in locations such as passageways, doorways, or driveways where they can be displaced by other activities or traffic must be secured to prevent accidental displacement or guarded by a temporary barricade, such as a row of traffic cones or caution tape, to keep the activities or traffic away from the ladder.
- h. The cap (if equipped) and top step of a stepladder must not be used as steps.
- i. Portable ladders used on slippery surfaces must be secured and stabilized.
- j. The top of a non-self-supporting ladder must be placed so that both side rails are supported, unless the ladder is equipped with a single support attachment.
- k. Portable ladders used to gain access to an upper landing surface must have side rails that extend at least 3 feet (0.9 m) above the upper landing surface (see **Figure D-1**).
- l. Ladders and ladder sections must not be tied or fastened together to provide added length unless they are specifically designed for such use.
- m. Ladders must not be placed on boxes, barrels, or other unstable bases to obtain additional height.

All fixed ladders must meet the requirements of **29 CFR 1910.23(d)**. Mobile ladder stands and mobile ladder stand platforms must meet the requirements of **29 CFR 1910.23(e)**. Step bolts and manhole steps will meet the requirements of **29 CFR 1910.24**.

Lighting

A competent person will ensure that all work areas have adequate lighting. Adequate lighting serves a two-fold purpose – allowing tasks to be more readily performed as well as providing the additional safety factor of being seen by persons not involved with the work – especially vehicular traffic.

If generators are used for auxiliary lighting, they will be operated and maintained by authorized persons who are competent by training or experience.

Machine Guarding

[29 CFR 1910.212: General requirements for all machines.](#)

[29 CFR 1910.217: Mechanical power presses.](#)

[29 CFR 1910.217: App A Mandatory requirement for certification/validation of safety systems for presence sensing device initiation of mechanical power presses](#)

[29 CFR 1910.217: App B Non-mandatory guidelines for certification/validation of safety systems for presence sensing device initiation of mechanical power presses](#)

[29 CFR 1910.217: App C Mandatory requirements for OSHA recognition of third-party validation organizations for the PSDI standard](#)

[29 CFR 1910.217: App D Non-mandatory supplementary information](#)

[29 CFR 1910.219: Mechanical power-transmission apparatus](#)

[29 CFR 1910.269 - Telecommunications](#)

Most injuries that occur when operating a machine happen at the point of operation -- the point on a machine where the actual work (cutting, bending, spinning) occurs. This is also the point where guards can protect fingers and hands exposed to that danger. Machine guarding also protects employees from other dangers such as flying pieces of metal, sparks, gears, belts, and rotating parts.

Accident prevention in this area is a function of machine design, engineering controls, and operator training. Types of machine guarding are almost as numerous as types of machines with the most common being a physical barrier to prevent accidental insertion of body parts. Guards are vital for safety reasons and machine guards designed into a machine should never be altered or removed. The speed and tremendous forces generated in modern machines is such that severe injury or even death could occur without warning and without even slowing the machine down.

Training and proper work methods go a long way toward reducing machine accidents. Like all safeguards, there is generally a way to bypass safety features that are engineered into machines. This is sometimes done to increase speed or just to make one's job easier. This could result in a tragic, avoidable accident. The few seconds saved could cause a lifetime of grief. Do not bypass safety systems.

Horizontal belts, pulleys, and gears which are less than seven feet from the floor will be guarded. Operate all machines according to the instruction manual and follow all safety procedures.

Because of the seriousness of machine guarding, specific guidelines for point of operation guarding follow:

Reference our Lockout-Tagout - Control of Hazardous Energy Program and Personal Protective Equipment Program.

OSHA's machinery and machine guarding standards require that one or more guarding methods be utilized to protect employees (operating, minor servicing and others nearby) from exposure to hazardous machine energy.

Methods of Machine Safeguarding

There are many ways to safeguard machines. The type of operation, the size or shape of stock, the method of handling, the physical layout of the work area, the type of material, and production requirements or limitations will help to determine the appropriate safeguarding method for the individual machine.

As a general rule, power transmission apparatus is best protected by fixed guards that enclose the danger areas. For hazards at the point of operation (where moving parts actually perform work on stock) several kinds of safeguarding may be possible. One must always choose the most effective and practical means available.

Safeguard Classifications:

Guards

a. Fixed

A fixed guard is a permanent part of the machine. It is not dependent upon moving parts to perform its intended function. It may be constructed of sheet metal, screen, wire cloth, bars, plastic, or any other material that is substantial enough to withstand whatever impact it may receive and to endure prolonged use. This guard is usually preferable to all other types because of its relative simplicity and permanence.

b. Interlocked

When this type of guard is opened or removed, the tripping mechanism and/or power automatically shuts off or disengages, and the machine cannot cycle or be started until the guard is back in place. An interlocked guard may use electrical, mechanical, hydraulic, or pneumatic power or any combination of these. Interlocks should not prevent "inching" by remote control if required. Replacing the guard should not automatically restart the machine. To be effective, all movable guards should be interlocked to prevent occupational hazards.

c. Adjustable

Adjustable guards are useful because they allow flexibility in accommodating various sizes of stock.

d. Self-adjusting

The openings of these barriers are determined by the movement of the stock. As the operator moves the stock into the danger area, the guard is pushed away, providing an opening which is only large enough to admit the stock. After the stock is removed, the guard returns to the rest position. This guard protects the operator by placing a barrier between the danger area and the operator. The guards may be constructed of plastic, metal, or other substantial material. Self-adjusting guards offer different degrees of protection.

Devices

a. Presence Sensing

1. Photoelectrical (optical)

The photoelectric (optical) presence-sensing device uses a system of light sources and controls which can interrupt the machine's operating cycle. If the light field is broken, the machine stops and will not cycle. This device must be used only on machines which can be stopped before the worker can reach the danger area. The design and placement of the guard depends upon the time it takes to stop the mechanism and the speed at which the employee's hand can reach across the distance from the guard to the danger zone.

2. Radiofrequency (capacitance)

The radiofrequency (capacitance) presence-sensing device uses a radio beam that is part of the machine control circuit. When the capacitance field is broken, the machine will stop or will not activate. Like the photoelectric device, this device will only be used on machines which can be stopped before the worker can reach the danger area. This requires the machine to have a friction clutch or other reliable means for stopping.

3. Electromechanical

The electromechanical sensing device has a probe or contact bar which descends to a predetermined distance when the operator initiates the machine cycle. If there is an obstruction preventing it from descending its full predetermined distance, the control circuit does not actuate the machine cycle.

b. Pullback

Pullback devices utilize a series of cables attached to the operator's hands, wrists, and/or arms. This type of device is primarily used on machines with stroking action. When the slide/ram is up between cycles, the operator is allowed access to the point of operation. When the slide/ram begins to cycle by starting its descent, a mechanical linkage automatically assures withdrawal of the hands from the point of operation.

c. Restraint

A restraint (holdout) device utilizes cables or straps that are attached to the operator's hands at a fixed point. The cables or straps must be adjusted to let the operator's hands travel within a predetermined safe area. There is no extending or retracting action involved. Consequently, hand-feeding tools are often necessary if the operation involves placing material into the danger area.

d. Safety Controls

Safety trip controls provide a quick means for deactivating the machine in an emergency situation.

1. Safety Trip Control

i. Pressure-Sensitive Body Bar

A pressure-sensitive body bar, when depressed, will deactivate the machine. If the operator or anyone trips, loses balance, or is drawn toward the machine, applying pressure to the bar will stop the operation. Therefore, the positioning of the bar is critical. It must stop the machine before a part of the employee's body reaches the danger area.

ii. Safety Trip Rod

When pressed by hand, the safety trip rod deactivates the machine. Because the trip rod has to be actuated by the operator during an emergency situation, its proper position is also critical.

iii. Safety Tripwire Cable

Safety tripwire cables are located around the perimeter of or near the danger area. The operator must be able to reach the cable with either hand to stop the machine. All of these tripwire rods or other safety devices must be manually reset to restart the machine. Simply releasing the tripwire to restart the machine will not ensure that the employee is out of danger when the machine restarts.

2. Two-Hand Control

The two-hand control requires constant, concurrent pressure by the operator to activate the machine. This kind of control requires a part-revolution clutch, brake, and a brake monitor if used on a power press. With this type of device, the operator's hands are required to be at a safe location (on control buttons) and at a safe distance from the danger area while the machine completes its closing cycle.

3. Two-Hand Trip

A two-hand trip requires concurrent application of both the operator's control buttons to activate the machine cycle, after which the hands are free. This device is usually used with machines equipped with full-revolution clutches. The trips must be placed far enough from the point of operation to make it impossible for the operator to move his or her hands from the trip buttons or handles into the point of operation before the first half of the cycle is completed. The distance from the trip button depends upon the speed of the cycle and the band speed constant. Thus, the operator's hands are kept far enough away to prevent them from being placed in the danger area prior to the slide/ram or blade reaching the full "down" position. To be effective, both two-hand controls and trips must be located so that the operator cannot use two hands or one hand and another part of his/her body to trip the machine.

Gates

A gate is a movable barrier that protects the operator at the point of operation before the machine cycle can be started. In many instances, gates are designed to be operated with each machine cycle.

a. Interlocked

To be effective, the gate must be interlocked so that the machine will not begin a cycle unless the gate guard is in place. It must be in the closed position before the machine can function. If the gate is not permitted to descend to the fully closed position, the press will not function. Another potential application of this type of guard is where the gate is a component of a perimeter safeguarding system. Here the gate may provide protection not only to the operator but to pedestrian traffic as well.

Location/Distance

A thorough hazard analysis of each machine and particular situation is absolutely essential before attempting this safeguarding technique. To consider a part of a machine to be safeguarded by location, the dangerous moving part of a machine must be so positioned that those areas are not accessible or do not present a hazard to a worker during the normal operation of the machine. This may be accomplished by locating a machine so that the hazardous parts of the machine are located away from operator work stations or other areas where employees walk or work and/or positioning a machine with its power transmission apparatus against a wall and leaving all routine operations conducted on the other side of the machine. Additionally, enclosure walls or fences can restrict access to machines.

Another possible solution is to have dangerous parts located high enough to be out of the normal reach of any worker. The feeding process can be safeguarded by location if a safe distance can be maintained to protect the worker's hands. The dimensions of the stock being worked on may provide adequate safety. For instance, if the stock is several feet long and only one end of the stock is being worked on, the operator may be able to hold the opposite end while the work is being performed. An example would be a single-end punching machine. However, depending upon the machine, protection might still be required for other personnel in the area. The positioning of the operator's control station provides another potential approach to safeguarding by location. Operator controls may be located at a safe distance from the machine if there is no reason for the operator to tend it.

Warning Signs

If telecommunication work exposes energized or moving parts that are normally protected, danger signs will be displayed and barricades erected, as necessary, to warn other personnel in the area.

When power plant machinery in telecommunications centers is operated with commutators and couplings uncovered, the adjacent housing will be clearly marked to alert personnel to the rotating machinery. See *Signs & Tags*.

Basic Policy

Power machinery must not be “energized” [connected to an energy source or containing residual or stored energy] unless it is under the control of a trained operator and the point of operation is guarded by one or more physical barriers or a physical device with the following exception:

Minor tool changes and adjustments, and other minor servicing activities, which take place during normal production operations, are not covered by this standard [Control of Hazardous Energy] if they are routine, repetitive, and integral to the use of the equipment for production, provided that the work is performed using alternative measures which provide effective protection.

or as provided under the servicing and maintenance testing and positioning requirements of paragraph 29 CFR 1910.147(f):

Testing or positioning of machines, equipment or components thereof. 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 will be followed:

- (i) Clear the machine or equipment of tools and materials.
- (ii) Remove employees from the machine or equipment area.
- (iii) Remove the lockout or tagout devices.
- (iv) Energize and proceed with testing or positioning.
- (v) De-energize all systems and reapply energy control measures to continue the servicing and/or maintenance.

Do not confuse the requirements of our Lockout-Tagout - Control of Hazardous Energy Program with the requirements of Machine Guarding. Even though minor tool changes, adjustments, and other minor servicing activities which take place during normal production operations are not covered by the Control of Hazardous Energy standard because they are routine, repetitive, and integral to the use of the equipment for production, machine guarding is still required to protect the employee who is performing the servicing operations mentioned above.

Failure to follow point of operation safety procedures and guidelines can generally result in loss of fingers. However, loss of any body part or even a fatal accident is a possibility.

Machinery

Spinning, pounding, and moving – gears, pulleys, levers – electricity, fuel, and hydraulics – action, reaction, force: danger! Machinery takes energy and performs a task or a multitude of tasks. Machinery, from a safety standpoint, is a collection of individual, simple machines (pulleys, gears, etc.) combined to work in harmony to accomplish a specific job.

The danger is obvious: the power, speed, movement, and momentum of machinery is not going to be altered by something as insignificant as an employee's finger, hand, or even body.

How does one deal with the dangers of machinery?

- a. **Never** operate any machinery until you have received proper training and you thoroughly understand safety procedures as well as procedures to follow for adjustments, power interruption, jamming, lubrication, and inspection.
- b. Ensure the guarding systems are in place, functioning properly, and have not been altered or removed.
- c. If a hazard assessment of the machinery operation dictates specific personal protective equipment (PPE), wear it!
- d. From purely a safety standpoint, think of any power operated item with moving parts as machinery. This would include items as diverse as a small electric drill to an 80,000-pound tractor-trailer.

Material Storage

General Requirement for Storage

All materials stored in tiers will be stacked, racked, blocked, interlocked, or otherwise secured to prevent sliding, falling or collapse.

Maximum safe load limits of floors within buildings and structures, in pounds per square foot, will be conspicuously posted in all storage areas, except for floor or slab on grade. Maximum safe loads will not be exceeded.

Aisles and passageways will be kept clear to provide for the free and safe movement of material handling equipment or employees. Such areas will be kept in good repair.

When a difference in road or working levels exist, means such as ramps, blocking, or grading will be used to ensure the safe movement of vehicles between the two levels.

Material Storage

Material stored inside buildings under construction will not be placed within 4 feet of any hoistway or inside floor openings, nor within 10 feet of an exterior wall which does not extend above the top of the material stored.

Each employee required to work on stored material in silos, hoppers, tanks, and similar storage areas will be equipped with personal fall arrest equipment meeting the requirements of Fall Protection of this Safety Manual.

Noncompatible materials will be segregated in storage.

Bagged materials will be stacked by stepping back the layers and cross-keying the bags at least every 10 bags high.

Materials will not be stored on scaffolds or runways in excess of supplies needed for immediate operations.

Brick stacks will not be more than 7 feet in height. When a loose brick stack reaches a height of 4 feet, it will be tapered back 2 inches in every foot of height above the 4-foot level.

When masonry blocks are stacked higher than 4 feet, the stack will be tapered back one-half block per tier above the 6-foot level.

Used lumber will have all nails withdrawn before stacking.

Lumber will be stacked on level and solidly supported sills and will be so stacked as to be stable and self-supporting.

Mold & Mildew

Molds and mildew are fungi that can be found inside a building in which employees of DFW Moving Company are working. Within the United States, there are about 1,000 species of mold.

Problems may arise when mold starts eating away at materials, affecting the look, smell, and possibly, with the respect to wood-framed buildings, affecting the structural integrity of the buildings.

Molds can grow on virtually any substance, as long as moisture or water, oxygen, and an organic source, **such as wood**, are present. Molds reproduce by creating tiny spores (viable seeds) that usually cannot be seen without magnification. In fact, mold spores continually floating through both the indoor and outdoor air and these spores, alone, **do not create a problem**.

The problem occurs when mold spores land on a damp spot and begin growing. They digest whatever they land on in order to survive. Molds can grow on wood, paper, carpet, foods, insulation, and even dust and dirt that gathers in moist areas a building.

Over time, molds can gradually damage building materials and furnishings. If left unchecked, mold can eventually cause structural damage to a wood framed building, weakening floors and walls as it feeds on moist wooden structural members.

Most molds do not present a true health hazard in the general population. Molds can, however, cause adverse effects by producing allergens and the allergic reactions to mold can be either immediate or delayed. Allergic responses would include hay fever-type symptoms such as runny nose and red eyes.

Should mold be discovered on any of our locations, we will seek a professional mold remediation contractor.

Should mold develop at the facility where our employees are working, the following precautionary steps will be taken:

- a. Dust mask may be used for personal employee comfort.
- b. Items damaged by mold may be discarded a general waste with no special precautions needed.

Platforms

Open sided platforms or floors 4 feet above a lower level must be guarded by standard railings. If an employee's work requires him or her to work at a height of 4 feet or more above a lower level and standard guardrails are not available, fall protection will be provided by a safety harness and lanyard. Particular attention will be paid to the anchorage point to ensure that it is capable of the stresses that may be placed upon it.

Ramps

To load or unload lawn care equipment from truck and/or trailers, ramps generally will be used. Employees are to ensure that ramp capacities are not exceeded.

Portable ramps should be level and securely fastened to the truck or trailer bed. If the ramp does not have hooks, straps will be used.

Scissor-Lift Fall Protection

What type of fall protection is required for scissor-lifts? This apparently simple question has a relatively simple answer. However, how it is derived is somewhat complicated because OSHA does not have a standard to deal with this issue.

Clearly, there is a hazard – falling from height. However, fall protection while using a scissor-lift is not covered in the fall protection, scaffold and ladder fall protection, nor aerial lift fall protection standards.

Section 5(a)(1) of the Occupational Safety and Health Act, commonly referred to as the General Duty Clause is a “catch all clause” which states: "Each employer will furnish to each of its' employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

In the absence of a specific standard relating to a safety or health risk, the above is the reference OSHA will cite.

When assessing compliance efforts, OSHA considers the requirements of pertinent national consensus standards. In the case of scissor-lifts, ANSI/SIA A92.6-1990, Self-propelled Elevated Work Platforms, and ANSI/SIA A92.3, Manually Propelled Elevating Aerial Platforms, are used.

Fall protection is provided by employees maintaining firm footing on the lift and using guardrails. Under no circumstances are employees to place ladders or other items on the lift to extend their reach. Per ANSI/SIA standards, with which OSHA concurs, "Use of planks, ladders, or any other device on the aerial platform for achieving additional height or reach will be prohibited." Use of these items negates the value of the guardrail system and may possibly exceed the scissor-lift's design limits for stability.

Further, personnel are not to tie off to items adjacent to the lift – the most obvious reasons are: the anchorage point may not be sufficient, and movement of the lift would pull the employee out of and off of the lift.

If, for some reason, guardrails are not being provided for specific operational reasons, then a personal fall protection system may be used which would include an anchorage point, lanyard and safety harness.

However, this option is severely limited because its design would have to be approved by a registered engineer or the scissor-lift manufacturer would have to approve the use of the lift as an anchorage.

Under ideal conditions, rarely found on a construction site, scissor-lifts may be moved with the lift extended. However, should obstacles, debris, drop-offs, holes, depressions, ramps or other hazards be present, the lift must be lowered prior to movement.

Finally, if the employee leaves the safety of the scissor-lift platform while working at height, some sort of approved fall protection system must be employed.

Signs & Tags

29 CFR 1910.145: Specifications for accident prevention signs and tags

When appropriate, signs and tags will be used to warn of specific hazards. Types of signs are classified according to their use, and their design is regulated by OSHA standard. All personnel will be instructed in the meaning of the various types of signs. Sign usage includes:

- a. Danger Signs (Red, Black & White): indicates immediate danger and denotes that special precautions are necessary.
- b. Caution Signs (Yellow Background): warns of a potential hazard or cautions against an unsafe practice.
- c. Safety Instruction Signs (White Background): used to provide general instructions and suggestions relative to safety measures.

The wording on signs must be positive, clear, concise, and easy to understand or the sign loses its value.

Accident prevention tags are to warn of hazardous or potentially hazardous conditions that are out of the ordinary, unexpected, or not readily apparent. They are not used where signs, guarding or other positive means of protection are used. All tags must have:

- a. A signal word: "Danger," "Caution," "Warning," "BIOHAZARD" (or its symbol) and a major message, and
- b. A major message such as: "High Voltage" or "Do not start". (Major messages indicate the specific hazardous condition.)

The color scheme is basically the same as for signs:

red =	danger
yellow =	caution
orange =	warning
fluorescent orange =	biological hazard

- a. Danger Tags: indicate an immediate hazard that presents a threat of death or serious injury.
- b. Caution Tags: indicate a non-immediate hazard or unsafe practice that presents a lesser threat of injury.
- c. Warning Tags: indicate a hazard between "Danger" and "Caution".
- d. BIOHAZARD Tags: indicate the actual or potential presence of a biological hazard and identify equipment, rooms, containers, etc. that may be contaminated.

Pay attention to signs and tags and realize that they are in place for only one reason – your safety.

Stairways

[29 CFR 1910.25 - Stairways](#)

29 CFR 1910.25 covers all stairways, including standard, spiral, ship, and alternating tread-type stairs, except for stairs serving floating roof tanks, stairs on scaffolds, stairs designed into machines or equipment, and stairs on self-propelled motorized equipment.

The following are general requirements for stairways:

- a. Handrails, stair rail systems, and guardrail systems are provided in accordance with 29 CFR 1910.28.
- b. Vertical clearance above any stair tread to any overhead obstruction must be at least 6 feet 8 inches as measured from the leading edge of the tread.

Note: Spiral stairs must meet the vertical clearance requirements in 29 CFR 1910.25(d)(3).

- c. Stairs have uniform riser heights and tread depths between landings.
- d. When a door or a gate opens directly on a stairway, a platform is provided, and the swing of the door or gate does not reduce the platform's effective usable depth to:
 1. Less than 20 inches for platforms installed before January 17, 2017.
 2. Less than 22 inches for platforms installed on or after January 17, 2017.
- e. Each stair must be able to support at least five times the normal anticipated live load, but never less than a concentrated load of 1,000 pounds applied at any point

- f. Standard stairs are used to provide access from one walking-working surface to another when operations necessitate regular and routine travel between levels, including access to operating platforms for equipment.

Note: Winding stairways may be used on tanks and similar round structures when the diameter of the tank or structure is at least 5 feet.

- g. Spiral, ship, or alternating tread-type stairs are used only when the employer can demonstrate that it is not feasible to provide standard stairs.

Tools - Hand

29 CFR 1910.242 - Hand and Portable Powered Tools and Equipment - General

29 CFR 1910.243 - Guarding of Portable Powered Tools

29 CFR 1910.269 - Telecommunications

All hand and power tools and similar equipment, whether furnished by the employer or the employee, will be maintained in a safe condition.

Portable electric hand tools will be:

- a. equipped with a three-wire cord having the ground wire permanently connected to the tool frame and means for grounding the other end; **or**
- b. of the double insulated type and permanently labeled as "Double Insulated"; **or**
- c. connected to the power supply by means of an isolating transformer, or other isolated power supply.

Here are basic procedures for the use of hand tools:

- a. Hand tools will be used only for the purpose for which they are designed.
- b. Hand tools will be kept clean and, where appropriate, oiled.
- c. Hand tools which are damaged will not be used.
- d. Handheld cutting tools will be kept sharp and will be sheathed or retracted when not in use.
- e. When using a striking tool such as a hammer or chisel, safety glasses or safety goggles will be used.
- f. Do not force tools.
- g. If you are unfamiliar with the proper procedure for using a tool, ask your Supervisor for instruction.
- h. Power tools may be operated only by those persons who are qualified by training or experience.
- i. Do not alter guards on power tools; wear appropriate PPE.
- j. Electrical tools must be grounded, and, in the absence of permanent wiring, a Ground Fault Circuit Interrupter must be used.
- k. Electric tools will not be lifted by their cords and pneumatic tools will not be lifted by their hoses.

Nominal 120V or less portable generators used for providing power at work locations do not require grounding if the output circuit is completely isolated from the frame of the unit.

Vehicle-mounted utility generators used for providing nominal 240V AC or less for powering portable tools and equipment need not be grounded to earth if all of the following conditions are met:

- a. One side of the voltage source is solidly strapped to the metallic structure of the vehicle;
- b. Grounding-type outlets are used, with a "grounding" conductor between the outlet grounding terminal and the side of the voltage source that is strapped to the vehicle;
- c. All metallic encased tools and equipment that are powered from this system are equipped with three-wire cords and grounding-type attachment plugs, except as detailed below.

Portable lights, tools, and appliances having noncurrent-carrying external metal housing may be used with nominal 120V or less portable generators as described above without an equipment grounding conductor. When operated from commercial power, metal parts of these devices must be grounded, unless these tools or appliances are protected by a system of double insulation, or its equivalent. Where such a system is employed, the equipment will be distinctively marked to indicate double insulation.

Soldering Devices and Lead Work

Grounding will be omitted when using soldering irons, guns, or wire-wrap tools on telecommunications circuits.

The wiping of lead joints using melted solder, gas fueled torches, soldering irons or other appropriate heating devices, and the soldering of wires or other electrical connections do not constitute the welding, cutting, and brazing described in [1910 Subpart Q](#). When operated from commercial power the metal housing of electric solder pots must be grounded. Electric solder pots may be used with nominal 120V or less portable generators as described above without a grounding conductor. Wiping gloves or cloths and eye protection must be used in lead wiping operations. A drip pan to catch hot lead drippings must also be provided and used.

Truck Operations

Employees are reminded that truck operations performed everywhere except over-the-road are subject to OSHA standards and guidelines.

Note: OSHA has jurisdiction over off-highway loading and unloading, such as warehouses, plants, grain handling facilities, retail locations, marine terminals, wharves, piers, and shipyards.

- a. Within the truck or tractor cab, there will be:
 1. An appropriate B:C fire extinguisher [inspected monthly for general condition and adequate charge & serviced and certified by qualified personnel at least annually].
 2. A first aid kit.
 3. Appropriate PPE for loading & unloading and working around the truck while not on the highway. Reference our PPE program in Section III of this safety program.
- b. When entering or exiting a truck or tractor cab, the employees are required to use provided steps & grab holds. Of course, seat belt use is required.
- c. When loading or unloading a box truck or trailer at a loading dock, the brakes will be set, the engine will be turned off [or the tractor cab disconnected from the semi-trailer] and the unit will be firmly attached to the dock and/or wheel chocks will be used.
- d. Only employees who have received training in powered pallet-jack operations will be authorized to operate them. Training will be given by a competent, by virtue of training or experience, person
- e. No employee may enter a tank type trailer without utilizing the provisions of our permit-required confined space program found in this safety program.
- f. In the event of an injury or occupational illness, the office will be contacted as soon as possible. An accident/injury report will be prepared.

Walking and Working Surfaces

29 CFR 1910.22 General Requirements

Access and Egress

First and foremost, DFW Moving Company will provide, and ensure each employee uses, a safe means of access and egress to and from all work areas.

Surface Conditions

DFW Moving Company will ensure that all our employees have access walking and working surfaces, including passageways, storerooms, and service rooms, that are kept in a clean, orderly, and sanitary condition.

The floor of each workroom will be maintained in a clean &, to the extent feasible, in a dry condition. When wet processes are used, drainage must be maintained &, to the extent feasible, dry standing places, such as false floors, platforms, & mats must be provided.

All walking-working surfaces must also be maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice.

We will ensure that all walking and working surface do not have materials or equipment on them in excess of the maximum intended load for that surface. When storing materials, the weight of any equipment on, or that might be on, that surface must also be considered in addition to the materials being stored.

Inspection, Maintenance, and Repair

We must ensure that all walking and working surfaces are inspected, regularly and as necessary, and maintained in a safe condition. If a hazardous condition on walking or working surfaces is found, it must be corrected or repaired before an employee uses that surface again.

If the correction or repair cannot be made immediately, the hazard must be guarded to prevent employees from using the surface until the hazard is corrected or repaired.

If any correction or repair involves the structural integrity of a walking or working surface, a qualified person must perform or supervise the correction or repair.

Support Structures:

Employees, materials, and equipment will not be supported on any portion of a pole structure, platform, ladder, walkway, or other elevated structure or aerial device unless the support structure is first inspected by a competent person and it is determined to be adequately strong, in good working condition, and properly secured in place.

Protection for Floor Openings:

Every stairway floor opening will be guarded by a standard railing. The railing will be provided on all exposed sides (except at entrance to stairway). For infrequently used stairways where traffic across the opening prevents the use of fixed standard railing (as when located in aisle spaces, etc.), the guard will consist of a hinged floor opening cover of standard strength and construction and removable standard railings on all exposed sides (except at entrance to stairway).

Every ladder way floor opening, or platform will be guarded by a standard railing with standard toeboard on all exposed sides (except at entrance to opening), with the passage through the railing either provided with a swinging gate or so offset that a person cannot walk directly into the opening.

Every hatchway and chute floor opening will be guarded by one of the following:

- a. Hinged floor opening cover of standard strength and construction equipped with standard railings or permanently attached thereto so as to leave only one exposed side. When the opening is not in use, the cover will be closed, or the exposed side will be guarded at both top and intermediate positions by removable standard railings.
- b. A removable railing with toeboard on not more than two sides of the opening and fixed standard railings with toeboards on all other exposed sides. The removable railings will be kept in place when the opening is not in use.

Where operating conditions necessitate the feeding of material into any hatchway or chute opening, protection will be provided to prevent a person from falling through the opening.

Every pit and trapdoor floor opening, infrequently used, will be guarded by a floor opening cover of standard strength and construction. While the cover is not in place, the pit or trap opening will be constantly attended by someone or will be protected on all exposed sides by removable standard railings.

Every manhole floor opening will be guarded by a standard manhole cover which need not be hinged in place. While the cover is not in place, the manhole opening will be constantly attended by someone or will be protected by removable standard railings.

If performing work on another employer's property, we will not modify fall protection for fixed stairways, ladder openings, hatchway openings, manholes, skylights, ramps, and platforms. We will request direct permission from the property owner if we need to make any changes.

Every temporary floor opening will have standard railings or will be constantly attended by someone.

Every floor hole into which persons can accidentally walk will be guarded by either:

- a. A standard railing with standard toeboard on all exposed sides, or
- b. A floor hole cover of standard strength and construction. While the cover is not in place, the floor hole will be constantly attended by someone or will be protected by a removable standard railing.

Every floor hole into which persons cannot accidentally walk (on account of fixed machinery, equipment, or walls) will be protected by a cover that leaves no openings more than 1 inch wide. The cover will be securely held in place to prevent tools or materials from falling through.

Protection for Wall Openings and Holes:

Every wall opening from which there is a drop of more than 4 feet will be guarded by one of the following:

- a. Rail, roller, picket fence, half door, or equivalent barrier. Where there is exposure below to falling materials, a removable toe board or the equivalent will also be provided. When the opening is not in use for handling materials, the guard will be kept in position regardless of a door on the opening. In addition, a grab handle will be provided on each side of the opening with its center approximately 4 feet above floor level and of standard strength and mounting.
- b. Extension platform onto which materials can be hoisted for handling, and which will have side rails or equivalent guards of standard specifications.

Every temporary wall opening will have adequate guards, but these need not be of standard construction.

Where there is a hazard of materials falling through a wall hole, and the lower edge of the near side of the hole is less than 4 inches above the floor, and the far side of the hole more than 5 feet above the next lower level, the hole will be protected by a standard toeboard, or an enclosing screen either of solid construction.

Protection of Open-Sided Floors, Platforms, and Runways:

Every open-sided floor or platform 4 feet or more above adjacent floor or ground level will be guarded by a standard railing on all open sides except where there is entrance to a ramp, stairway, or fixed ladder. The railing will be provided with a toeboard wherever, beneath the open sides,

- a. Persons can pass,
- b. There is moving machinery, or
- c. There is equipment with which falling materials could create a hazard.

Note: Guardrails and toeboards may be omitted on distribution frame mezzanine platforms for telecommunication operations to permit access to equipment. This exemption applies only on the side or sides of the platform facing the frames and only on those portions of the platform adjacent to equipped frames.

Every runway will be guarded by a standard railing on all open sides 4 feet or more above floor or ground level. Wherever tools, machine parts, or materials are likely to be used on the runway, a toeboard will also be provided on each exposed side.

Runways used exclusively for special purposes (such as oiling, shafting, or filling tank cars) may have the railing on one side omitted where operating conditions necessitate such omission, providing the falling hazard is minimized by using a runway of not less than 18 inches wide. Where persons entering upon runways become thereby exposed to machinery, electrical equipment, or other danger not a falling hazard, additional guarding that is specified may be essential for protection.

Regardless of height, open-sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units, and similar hazards will be guarded with a standard railing and toe board.

If an employee's work requires him or her to work at a height of 4 feet or more above a lower level and standard guardrails are not available, fall protection will be provided by a safety harness and lanyard. Particular attention will be paid to the anchorage point to ensure that it is capable of the stresses that may be placed upon it.

DFW Moving Company
Section III
Specific Compliance Programs

Bloodborne Pathogens & Other Infectious Material

Exposure Control Plan

29 CFR 1910.1030 - Bloodborne Pathogens

The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from workplace incidents within our facility.

Recordkeeping: all work-related injuries from needle-sticks and cuts, lacerations, punctures and scratches from sharp objects contaminated with another person's blood or other potentially infectious materials (OPIM) are to be recorded on the OSHA 300 as an injury.

Note: Our first aid kits do not contain sharps or needles. However, a contaminated sharp, such as a broken pair of glasses, may trigger the above.

- a. To protect the employee's privacy, the employee's name may not be entered on the OSHA 300
- b. If the employee develops a bloodborne disease, the entry must be updated and recorded as an illness.

Policy Statement

This Exposure Control Plan has been developed to eliminate or minimize the risk of exposure to bloodborne pathogens and other potentially infectious materials. This plan presents methods and procedures to eliminate and/or minimize the hazards associated with occupational exposure to bloodborne pathogens or other infectious materials.

As a matter of policy, universal precautions will be used.

Additional components of this plan include exposure determinations by job classification, standard operating procedures to eliminate or reduce the likelihood of disease transmission, the methods of disease transmission, definitions of terms, post exposure procedures and follow-up, training documentation, and recordkeeping.

Compliance with this plan not only fulfills the requirements of the Occupational Safety and Health Administration, but more importantly it fulfills our desire to maintain a safe working environment and safeguard the health of our employees.

All affected employees should feel free to review this plan at any time and are encouraged to consult with Jake Pritchard, our Exposure Control Plan Administrator, to resolve any issues affecting its implementation. Our Plan is to be made available to the Assistant Secretary of Labor for Occupational Safety and Health or a designated representative.

Definitions

All employees should know the "language" of this plan. Because some of the words and/or terms are not used in everyday life, each person must be aware of the definitions so that we are all "on the same page."

Below are OSHA definitions:

Assistant Secretary means the Assistant Secretary of Labor for Occupational Safety and Health, or designated representative.

Blood means human blood, human blood components, and products made from human blood.

Bloodborne Pathogens means pathogenic microorganisms that are present in human blood and can cause disease in humans. These pathogens include, but are not limited to, hepatitis B virus (HBV) and human immunodeficiency virus (HIV).

Clinical Laboratory means a workplace where diagnostic or other screening procedures are performed on blood or other potentially infectious materials.

Contaminated means the presence, or the reasonably anticipated presence, of blood or other potentially infectious materials on an item or surface.

Contaminated Laundry means laundry which has been soiled with blood or other potentially infectious materials or may contain sharps.

Contaminated Sharps means any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, broken capillary tubes, and exposed ends of dental wires.

Decontamination means the use of a physical or chemical procedure to remove, inactivate, or destroy bloodborne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use, or disposal.

Director means the Director of the National Institute for Occupational Safety & Health, U.S. Department of Health & Human Services, or designated representative.

Engineering Controls means controls (e.g., sharps disposal containers, self-sheathing needles, safer medical devices, such as sharps with engineered sharps injury protections and needleless systems) that isolate or remove the bloodborne pathogens hazard from the work area.

Exposure Incident means a specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that results from the performance of an employee's duties.

Hand-Washing Facilities means a facility providing an adequate supply of running potable water, soap, and single use towels or hot air-drying machines.

Licensed Healthcare Professional means a person whose legally permitted scope of practice allows him or her to independently perform the activities required by 29 CFR 1910.1030(f), Hepatitis B Vaccination & Post-exposure Evaluation and Follow-up.

HBV means hepatitis B virus.

HIV means human immunodeficiency virus.

Needleless Systems means a device that does not use needles for:

- a. The collection of bodily fluids or withdrawal of body fluids after initial venous or arterial access is established,
- b. The administration of medication or fluids, or
- c. Any other procedure involving the potential for occupational exposure to bloodborne pathogens due to percutaneous injuries from contaminated sharps.

Occupational Exposure means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.

Other Potentially Infectious Materials:

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

Parenteral means piercing mucous membranes or the skin barrier through such events as needle-sticks, human bites, cuts, and abrasions.

Personal Protective Equipment means specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes (e.g., uniforms, pants, shirts or blouses) not intended to function as protection against a hazard are not considered to be personal protective equipment.

Production Facility means a facility engaged in industrial-scale, large-volume or high concentration production of HIV or HBV.

Regulated Waste means liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials in a liquid or semi-liquid state if compressed; items that are caked with dried blood or other potentially infectious materials and are capable of releasing these materials during handling; contaminated sharps; and pathological and microbiological wastes containing blood or other potentially infectious materials.

Research Laboratory means a laboratory producing or using research-laboratory-scale amounts of HIV or HBV. Research laboratories may produce high concentrations of HIV or HBV but not in the volume found in production facilities.

Sharps with Engineered Sharps Injury Protections means a non-needle sharp or a needle device used for withdrawing body fluids, accessing a vein or artery, or administering medications or other fluids, with a built-in safety feature or mechanism that effectively reduces the risk of an exposure incident.

Source Individual means any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee. Examples include, but are not limited to, hospital and clinic patients; clients in institutions for the developmentally disabled; trauma victims; clients of drug and alcohol treatment facilities; residents of hospices and nursing homes; human remains; and individuals who donate or sell blood or blood components.

Sterilize means the use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospores.

Universal Precautions means an approach to infection control. According to the concept of Universal Precautions, all human blood & certain human body fluids are treated as if known to be infectious for HIV, HBV, & other bloodborne pathogens.

Work Practice Controls means controls that reduce the likelihood of exposure by altering the manner in which a task is performed (e.g., prohibiting recapping of needles by a two-handed technique).

Exposure Control Plan

This Exposure Control Plan is provided for all personnel who, as a result of the performance of their duties, would have reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials.

This plan will be reviewed and updated annually and whenever necessary as new or modified tasks and procedures are introduced which affect occupational exposure to bloodborne pathogens or other potentially infectious materials. The review and update of this plan will:

- a. Reflect changes in technology that eliminate or reduce exposure to bloodborne pathogens.
- b. Annually document consideration and implementation of appropriate commercially available and effective safer medical devices designed to eliminate or minimize occupational exposure.

First aid providers are employees responsible for direct trauma victim care, who are potentially exposed to injuries for contaminated sharps, will be asked for input on the identification, evaluation, and selection of effective engineering and work practice controls.

This Exposure Control Plan, with a copy of 29 CFR 1910.1030 – Bloodborne Pathogens, will be made accessible to all employees as well as the Assistant Secretary and the Director (see definitions) who may examine and copy this plan.

Exposure Determination

Three (3) lists will be prepared and they will be maintained at the end of this exposure control plan for bloodborne pathogens & other infectious material, located here.

- List I: A list of all job classifications in which all employees have occupational exposure.
- List II: A list of job classifications in which some employees have occupational exposure.
- List III: A list of all tasks and procedures, or groups of closely related tasks and procedures, in which occupation exposure occurs and are performed by employees in job classifications noted in List II.

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Methods of Compliance

Universal precautions will be used. DFW Moving Company will treat all trauma victims' blood, bodily fluids, & other potentially infectious materials as if they are known to be infectious. Unfortunately, there is no immediate, practical way to determine if HIV, HBV, & other bloodborne pathogens are present so, to be safe, we will assume they are.

Traditionally, isolation of infectious materials has been diagnosis-driven. This meant that if a person were diagnosed to have HIV or HBV infection, for example, then isolation precautions would be taken. Because the infection status of each trauma victim cannot be immediately known, it makes sense to treat all trauma victims and their body fluids as if they were infected.

The precautions to take depend on the procedures being performed. For example, if one's hands will be in contact with body substances, disposable gloves will be worn. If there is risk of one's eyes being splashed with body fluids, eye protection will be worn. An impermeable barrier must be placed between yourself and the potentially infectious bodily fluids. Overkill is not necessary. Cleaning up a minor spill on a counter top does not require a mask, eye protection, and plastic apron. It does, however, require disposable gloves.

All employees will strictly adhere to the below engineering and work practice controls to eliminate or reduce the possibility of occupational exposure to bloodborne pathogens or other potentially infectious materials. Specific controls and procedures noted below will be used to eliminate or minimize employee exposure.

Handwashing Equipment and Procedures:

Handwashing facilities are provided which are readily accessible to all employees.

Employees will wash their hands & any other skin area exposed to blood or other potentially infectious materials with soap & water immediately or as soon as feasible:

- a. After removal of gloves or other personal protective equipment.
- b. Following contact with blood or other potentially infectious materials.

Particular attention will be given to fingernails and between fingers and rings under which infectious material may lodge. Furthermore, one should be aware that rings and jewelry are a good hiding place for bloodborne pathogens and other potentially infectious materials.

Examples of situations where handwashing is appropriate:

- a. Before and after examining any trauma victim.
- b. After handling any soiled waste or other materials.
- c. After handling any chemicals or used equipment.

If for some reason handwashing facilities are not functioning, appropriate antiseptic hand cleaner and clean cloth/paper towels (antiseptic towelettes) will be provided and used. If antiseptic hand cleaner and clean cloth/paper towels are used, hands will be washed with soap and water as soon as feasible.

Eating, Drinking, Smoking:

There will be no eating, drinking, smoking, applying cosmetics or lip balm, or handling contact lenses in areas where there is a likelihood of occupational exposure to bloodborne pathogens or other potentially infectious materials.

Furthermore, food & drink will not be kept in refrigerators, freezers, shelves, cabinets, on countertops, or benches where blood or other potentially infectious materials are present.

Contaminated Needles & Other Contaminated Sharps:

Contaminated needles will not be sheared or broken.

Furthermore, all contaminated needles and other contaminated sharps will not be bent, recapped, or removed unless:

- a. It can be demonstrated that no alternative is feasible or that it is required by a specific medical procedure.
- b. Recapping or needle removal may be accomplished through the use of a mechanical device or a one-handed method.

Contaminated **reusable** sharps will be placed in appropriate containers immediately or as soon as possible after use until properly reprocessed. These containers will:

- a. Be puncture resistant.
- b. Have warning labels affixed to containers potentially infectious material and contain the following legend:



Note: The above label will be fluorescent orange or orange-red or predominantly so, with lettering and symbols in a contrasting color.

Labels will be affixed as close as feasible to the container by string, wire, adhesive, or other method that prevents their loss or unintentional removal.

Red bags or red containers may be substituted for labels.

- c. Be leak proof on the sides and bottom.

Reusable sharps that are contaminated with blood or other potentially infectious materials will not be stored or processed in a manner that requires employees to reach by hand into the containers where these sharps have been placed.

Contaminated **non-reusable** sharps will be discarded immediately or as soon as feasible and placed in containers that:

- a. Are closable
- b. Are puncture resistant
- c. Are leak proof on sides and bottom
- d. Have warning labels affixed that contain the following legend:



Note: The above label will be fluorescent orange or orange-red or predominantly so, with lettering and symbols in a contrasting color.

Labels will be affixed as close as feasible to the container by string, wire, adhesive, or other method that prevents their loss or unintentional removal.

Red bags or red containers may be substituted for labels.

Contaminated **non-reusable** sharps will not be stored or processed in such a manner that requires employees to reach by hand into the containers where these sharps have been placed.

During use, containers for contaminated sharps must be:

- a. Easily accessible to our employees.
- b. Located as close as feasible to the immediate area where sharps are used or can be reasonably anticipated to be found.
- c. Maintained upright throughout use.
- d. Replaced routinely and not be allowed to overfill.

If leakage is possible when removing a container of contaminated sharps, it will be placed in a second container with the following container requirements:

- a. It will be closable,
- b. It will be constructed to contain all contents and prevent leakage during handling, storage, transport, or shipping, and
- c. Colored coded red or labeled as noted above.

Reusable containers will not be opened, emptied, or cleaned manually or in any other manner which would expose employees to the risk of percutaneous (introduced through the skin such as a cut) injury.

Other Regulated Waste - Containment:

The provisions that apply to contaminated sharps, above, apply to other regulated waste.

Disposal of Contaminated Sharps & Other Regulated Waste:

The actual disposal of all regulated waste will be in compliance with applicable state laws.

Specimens of Potentially Infectious Materials:

Specimens of blood & potentially infectious materials will be placed in a container which prevents leakage during collection, handling, processing, storage, transport, or shipping.

Splashing, Spraying of Potentially Infectious Materials:

All procedures involving blood or other potentially infectious materials will be performed in such a manner as to minimize splashing, spraying, spattering, and the generation of droplets of these substances.

Mouth Pipetting:

Mouth pipetting & mouth suction of blood or other potentially infectious materials is prohibited.

Exposure Control Plan Administrator

Jake Pritchard, our designated Exposure Control Plan Administrator, will be knowledgeable in all aspects of this Plan as it relates to our operations and be available to answer questions raised by our first aid providers. Jake Pritchard may call upon professionals in the Medical Arts to field questions that are of technical nature outside of the area of expertise.

Jake Pritchard will:

- a. Ensure this Plan is kept current.
- b. Ensure training is provided as required.
- c. Maintain all records associated with this plan.

Designated First Aid Provider

Before one may be designated as a first aid provider, he/she must have a valid certificate in first aid training from the U.S. Bureau of Mines, the Red Cross, or equivalent training that can be verified by documentary evidence. No person is to administer any medical assistance for which they are not appropriately trained. It is noted that the rendering of first aid is not the primary job of our designated first aid providers.

Personal Protective Equipment (PPE)

In spite of work practice and engineering controls, there is a requirement for appropriate personal protective equipment to provide an impermeable barrier between potentially infectious materials and the employees work clothes, street clothes, undergarments, skin, eyes, mouth, or other mucous membranes under normal conditions of use and for the duration of time which the protective equipment will be used.

Employees will use appropriate personal protective equipment when there is a possibility of occupational exposure to bloodborne pathogens or other potential infectious materials.

Personal protective equipment will be provided in appropriate sizes and at no cost to the employees. Further, maintenance and replacement of personal protective equipment will be provided at no cost to the employee.

Personal protective equipment will be discarded immediately if its ability to function as a barrier is compromised.

Most importantly, employees must understand that personal protective equipment is useless unless it provides an impermeable barrier between bloodborne pathogens and other potentially infectious materials and the employee's clothes, skin, eyes, mouth, or other mucous membranes.

Personal Protective Equipment is considered appropriate if it prevents potentially infectious materials from reaching work/street clothing or body surface when used under normal conditions.

Disposable Gloves:

Disposable, single use gloves, such as surgical or examination gloves will be worn when it can be reasonably anticipated that the employee may have hand contact with blood or other potentially infectious materials and when handling or touching contaminated items or surfaces. Disposable gloves will always be used when there is a possibility of contact with bloodborne pathogens or other potentially infectious materials.

Disposable gloves will never be washed, decontaminated, or reused.

Disposable gloves will be replaced as soon as practical when contaminated or as soon as feasible if they are torn, punctured, or their ability to function as a barrier is compromised.

Should any employee be allergic to the normal gloves provided, an appropriate alternative (such as hypoallergenic and/or powderless gloves) will be provided in the proper size at no cost to the employee.

Utility Gloves:

Utility gloves may be used for general cleanup (not for any trauma victim procedure) when there is anticipated exposure to bloodborne pathogens or other potentially infectious materials. Utility gloves may be decontaminated for re-use if the integrity of the gloves is not compromised. They will be discarded if they are cracked, peeling, torn, punctured, or exhibit signs of deterioration or when their ability to function as a barrier is compromised.

Eye and Respiratory Protection:

Eye (goggles, glasses, face shield, etc.) and respiratory (mask, etc.) protection will be used when it can reasonably be expected that bloodborne pathogens or other potentially infectious materials may splash or spray in or around the eyes, nose, mouth, and general head area of the employee.

Protective Body Clothing:

Protective body clothing such as gowns, aprons, lab coats, etc. will be worn as determined by the professional judgment of the employee in relation to task. The protective body clothing will certainly be worn where there can reasonably be expected exposure to bloodborne pathogens or other potentially infectious materials to the body area.

Laundry:

Personal protective equipment will be cleaned, laundered, and disposed of at no cost to the employee.

Note: In rare and extraordinary circumstances, an employee, in her/his professional judgment, may decline to temporarily and briefly wear personal protective equipment if he/she deems that the equipment would prevent the delivery of health care or would have increased the hazard of occupational exposure to the employee or his/her co-workers. Should this event occur, it will be documented, investigated, and procedures will be developed to prevent a reoccurrence.

Housekeeping

Housekeeping is an ongoing, never ending procedure which not only enhances our work environment but also eliminates health risk to our personnel. In the area of bloodborne pathogens and other hazardous materials, to ensure proper cleaning, decontamination, sterilization, and disinfecting of surfaces within our work area, cleaning will be accomplished only by employees who have received training in universal precautions and the provisions of this plan. The documented Housekeeping Schedule & Checklist is found at the end of this exposure control plan for bloodborne pathogens & other infectious material. This Schedule will be adhered to following an incident that results in the potential exposure to bloodborne pathogens or other potentially infectious materials.

Broken, potentially infected glassware should be picked up and disposed of using mechanical means such as a brush and dustpan or forceps. All sharps will be stored in a manner that allows easy access and safe handling. Infectious waste will be placed in containers that are color coded red. These containers will be decontaminated as soon as practical.

Subsequent to rendering any procedures, employees will ensure that all surfaces on which blood, body fluids, bloodborne pathogens, or other infectious materials may be present are cleaned with an appropriate disinfectant.

Hepatitis B Epidemiology

Hepatitis B (serum hepatitis) routes of infection include parenteral, oral, or direct contact. The virus can also spread by contact with the respiratory tract. Its sources include contaminated needles and surgical instruments as well as contaminated blood products. Hepatitis B virus has also been found in urine. Further, the hepatitis B virus can live for up to seven (7) days on a dry surface and can be easily be transmitted by a single needle stick. Its incubation period is quite lengthy generally between 45 and 180 days. It affects all age groups. Recovery from hepatitis B does provide immunity. Generally, one can expect a complete recovery from viral hepatitis; however, it is potentially fatal depending on many factors including the virulence (aggressiveness) of the virus, prior hepatic damage, and natural barriers to damage and disease of the liver. It is possible for viral hepatitis to lead to fulminating viral hepatitis and sub-acute fatal viral hepatitis both of which are fatal. Onset symptoms may include headache, elevated temperature, chills, nausea, dyspepsia, anorexia, general malaise, and tenderness over the liver. These types of symptoms will last about one (1) week, and then subside, and jaundice will occur. Jaundice is caused by damaged liver cells. The convalescent stage begins with the disappearance of the jaundice and may last several months. Recovery is expected in six (6) months.

Risk of Exposure

Per the Department of Human Services of the Center for Disease Control, below is the risk of infection after occupational exposure:

HBV:

First aid providers who have received hepatitis B vaccine and have developed immunity to the virus are at virtually no risk for infection. For an unvaccinated person, the risk from a single needle-stick or cut exposure to HBV-infected blood ranges from 6-30% and depends on the hepatitis B e antigen (HBeAg) status of the source individual. In individuals who are both hepatitis B surface antigen (HBsAG) positive and HBeAg positive have more virus in their blood and are more likely to transmit HBV.

HCV:

Based on limited studies, the risk for infection after a needle-stick or cut exposure to HCV-infected blood is approximately 1.8%. The risk following a blood splash is unknown, but is believed to be very small; however, HCV infection from such an exposure has been reported.

HIV:

The average risk of HIV infection after a needle stick or cut exposure to HIV-infected blood is 0.3% (i.e., three-tenths of one percent, or about 1 in 300). Stated another way, 99.7% of needle-stick/cut exposures do not lead to infection.

The risk after exposure of the eye, nose, or mouth to HIV-infected blood is estimated to be, on average, 0.1% (1 in 1,000).

The risk after exposure of the skin to HIV-infected blood is estimated to be less than 0.1%. A small amount of blood on intact skin probably poses no risk at all. There have been no documented cases of HIV transmission due to an exposure involving a small amount of blood on intact skin (a few drops of blood on skin for a short period of time). The risk may be higher if the skin is damaged (for example, by a recent cut) or the contact involves a large area of skin or is prolonged (for example, being covered in blood for hours). All employees with occupational exposure are encouraged to accept the hepatitis B vaccination.

Hepatitis B Vaccination

The hepatitis B vaccination series will be provided, at no cost, to all unvaccinated first aid providers as soon as possible (within 24 hours of initial exposure). All exposed first aid provider employees are encouraged to take this vaccination series unless they have previously received the complete hepatitis B vaccination series; antibody testing has revealed that the employee is immune; or the vaccine is contraindicated (not recommended) for medical reasons. Post-exposure evaluation, prophylaxis (prevention of or protection from disease), and follow-up will be provided at no cost to the employee.

The Hepatitis B vaccination will be performed under the supervision of a licensed physician or other licensed healthcare professional.

All laboratory tests will be conducted by an accredited laboratory at no cost to the employee.

Should routine booster dose(s) of hepatitis B vaccine (as recommended by the U.S. Public Health Service at a future date) be required, they will be provided at no cost as long as the employee remains a first aid provider.

An employee may decline the Hepatitis B vaccination and this declination will not reflect unfavorably upon him/her; however, this declination must be in writing. See the Hepatitis B Declination Form.

It is important to note that if a first aid provider initially declines the hepatitis B vaccination series, he/she may decide at a later date to accept the vaccination series and it will be provided at no cost assuming he/she is still occupationally exposed to bloodborne pathogens or other potentially infectious materials.

Sharps Injury Log

A Sharps injury log will be maintained for the recording of percutaneous injuries from contaminated sharps.

The information on the log will be recorded and maintained in such manner as to protect the confidentiality of the injured employee.

The sharps injury log will contain:

- a. The type and brand of device involved in the incident.
- b. The department or work area where the exposure incident occurred.
- c. An explanation of how the incident occurred.

The sharps injury log will be maintained for the period of five years.

First Aid Provider Input

As a matter of policy, all first aid providers who are responsible for first aid delivery as an additional job are encouraged to suggest methods to improve our engineering and workplace controls. This input may be made verbally to Jake Pritchard at any time. Additionally, suggestions will be solicited during the annual refresher training.

Plan Review

This plan will be reviewed, and if necessary, updated annually to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure. As new medical devices are developed which reduce employee exposure, they will be introduced into our practice. A review of the sharp's injury log will help identify problem areas and/or ineffective devices which may need replacement.

Post-Exposure Evaluation and Follow-Up

The information that has preceded *Post-Exposure Evaluation and Follow-up* has dealt with the methods to restrict occupational exposure to bloodborne pathogens and other infectious materials. Post-exposure evaluation and follow-up deals with the steps to take immediately following a potential exposure incident and the steps that will be taken over time to protect our employees from further health risk.

All incidents involving exposure to blood or other potentially infectious materials will be reported to Jake Pritchard, in writing, before the end of the shift in which the incident occurred using the Exposure Incident Report, located at the end of this exposure control plan for bloodborne pathogens & other infectious material. This Report will be prepared regardless of whether or not there has been an "Exposure Incident" as defined in this Plan and in 29 CFR 1910.1030. A separate Exposure Incident Report will be completed for each employee who was occupationally exposed. Information in this Report will include:

- a. The date and time the incident occurred.
- b. A brief description of the events leading up to the exposure (what happened).
- c. The name of the individual exposed.
- d. The route of exposure.
- e. "Source individual" and "exposed individual" information, including the acceptance or rejection of hepatitis B vaccination series.
- f. A determination of whether or not an actual "exposure incident" occurred. Refer to Definitions in this Plan or 29 CFR 1910.1030.

Jake Pritchard or his authorized representative will review the Exposure Incident Report and determine if methods or procedures may be altered to prevent a reoccurrence of the incident.

Further, an occupational bloodborne pathogens exposure incident which results in the recommendation for hepatitis B vaccination would be recorded on OSHA Form 300 as an injury. See Recordkeeping.

All unvaccinated employees who have assisted in any situation involving blood will be afforded the opportunity to receive the hepatitis B vaccination series as soon as possible but not later than twenty-four (24) hours after the situation.

A confidential medical evaluation and follow-up will be provided immediately, at no cost, to the employee. The healthcare professional evaluating an employee after an exposure incident will be provided a copy of 29 CFR 1910.1030.

Further, the healthcare professional will be provided a description of the exposed employee's duties as they relate to the exposure incident; documentation of the route(s) of exposure; the circumstances under which the exposure occurred; the results of the source individual's blood testing, if available; and all medical records relevant to the appropriate treatment of the employee including vaccination status which is maintained by our office. See Recordkeeping.

The confidential medical evaluation and follow-up will include:

- a. Documentation of the route(s) of exposure.
- b. The circumstances under which the exposure incident occurred.
- c. The identification and documentation of the source individual, unless it can be established that the identification is not feasible or prohibited by state or local law.
- d. The exposed employee's blood will be collected as soon as feasible and tested after consent is obtained.

Note: If the employee consents to baseline blood collection but does not consent at that time for HIV serologic testing, the sample will be preserved for at least 90 days. If, within 90 days of the exposure incident, the employee elects to have the baseline sample tested, such testing will be done as soon as feasible.

- e. The source individual's blood will be tested as soon as feasible to determine HBV and HIV infectivity unless it is already known, in which case this procedure is not necessary.

If consent to test the source individual's blood cannot be obtained the following will occur:

- a. It will be established and documented that legally required consent cannot be obtained.
- b. When the source individual's consent is not required by law, the source individual's blood will be tested, and the results documented.

The results of the source individual's testing will be made available to the exposed employee and the employee will be informed of applicable laws and the identity and infectious status of the source individual.

The employee will be provided post-exposure prophylaxis, when medically indicated, and counseling.

The employee will be provided with a copy of the healthcare professional's written opinion within 15 days of the completion of the evaluation. The written opinion will be limited to:

- a. Whether Hepatitis B vaccination is indicated and if the employee has received such vaccination.
- b. An indication that the employee has been informed of the results of the evaluation.
- c. An indication that the employee has been told about any medical conditions resulting from exposure to blood or other potentially infectious materials which require further evaluation or treatment.

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

Recordkeeping

Complete and accurate medical records will be maintained for each employee with occupational exposure. These records will remain confidential and will not be disclosed or reported to any person within or outside the workplace without the employee's express written consent, except as required by law.

Medical records will be maintained for at least the duration of employment plus 30 years.

Included in the employee's medical record will be:

- a. The employee's name
- b. A copy of the employee's hepatitis B vaccination status including the date of all the hepatitis B vaccinations and any medical records relative to the employee's ability to receive vaccination.
 1. If the employee has declined to receive the hepatitis B vaccination series when appropriate, this declination will be included in the person's medical records.
- c. A copy of all results of examinations, medical testing, and follow-up procedures as required following an exposure incident.
- d. The employer's copy of the healthcare professional's written opinion following an exposure incident.
- e. A copy of all information provided to the healthcare professional following an exposure incident.

All work-related injuries from needle-sticks and cuts, lacerations, punctures and scratches from sharp objects contaminated with another person's blood or other potentially infectious materials are to be recorded on the OSHA 300 as an injury.

- a. To protect the employee's privacy, the employee's name may not be entered on the OSHA 300.
- b. If the employee develops a bloodborne disease, the entry must be updated and recorded as an illness.

Training

All of our first aid providers must have current certificates of first aid and CPR training on file. These records will be maintained by Jake Pritchard.

Initial training, training at the introduction of a new or altered task affecting exposure to bloodborne pathogens or other potentially hazardous materials, and annual training will be provided by a person knowledgeable in the subject matter contained in this Plan.

Training will be interactive between the instructor and employee. An opportunity to ask questions will be provided. Further, this Plan as well as 29 CFR 1910.1030, Bloodborne Pathogens, will be readily available for review.

All training will be documented using the forms found in our Training Information and Documentation Program. Training documentation will be maintained for a period of three (3) years from the date on which the training occurred.

Training will include, but not be limited to, the following topics and materials:

- a. A complete review of our Exposure Control Plan and its accessibility.
- b. An accessible copy of 29 CFR 1910.1030 and an explanation of its contents.
- c. A general explanation of the epidemiology and symptoms of bloodborne diseases.
- d. An explanation of the modes of transmission of bloodborne pathogens.
- e. An explanation of the appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials.
- f. An explanation of the use and limitations of methods that will prevent or reduce exposure including appropriate engineering controls, work practices, and personal protective equipment.
- g. Information on the types, proper use, location, removal, handling, decontamination and disposal of personal protective equipment.
- h. An explanation of the basis for selections of personal protective equipment.
- i. Information on the hepatitis B vaccine, including information on its efficacy, safety, method of administration, benefits of being vaccinated, and that the vaccine and vaccination will be offered free of charge.
- j. Information on the appropriate actions to take and persons to contact in an emergency involving blood or other potentially infectious materials.
- k. An explanation of the procedure to follow if an exposure incident occurs, including the method of reporting the incident and the medical follow-up that will be made available.
- l. Information on the post-exposure evaluation and follow-up that is provided after an exposure incident.
- m. An explanation of the color coding required by 29 CFR 1910.1030(g)(1).
- n. A request for input from employees in the identification, evaluation, and selection of effective engineering and work practice controls.

Waste Management

Waste management, if necessary, will comply with State EPA standards regarding handling, storage, and shipping of medical wastes.

Summary

The whole thrust of the exposure control plan for bloodborne pathogens & other infectious material Plan is to provide an awareness of the dangers of bloodborne pathogens, provide a means of reducing the possibility of occupational exposure, and, should occupational exposure occur, provide a means of reducing health risk.

DFW Moving Company

Exposure Determination Form - List I

All job classifications in which all employees have occupational exposure.

1. First Aid Providers
2. _____
3. _____
4. _____
5. _____
6. _____

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from workplace incidents within our facility.

DFW Moving Company

Exposure Determination Form - List II

Job classifications in which some employees have occupational exposure:

1. None
2. _____
3. _____
4. _____
5. _____
6. _____

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from workplace incidents within our facility.

DFW Moving Company

Exposure Determination Form - List III

All tasks and procedures or groups of closely related tasks and procedures in which occupation exposure occurs and are performed by employees in job classifications noted in List II.

	Job Classification	Tasks
1.	<u>None</u>	<hr/> <hr/> <hr/> <hr/>
2.	<hr/>	<hr/> <hr/> <hr/> <hr/>
3.	<hr/>	<hr/> <hr/> <hr/> <hr/>
4.	<hr/>	<hr/> <hr/> <hr/> <hr/>

Note: The above exposure determinations are to be made without regard to the use of personal protective equipment.

Note: The primary job assignment of our designated first aid providers is not the rendering of first aid or other medical assistance. Any first aid rendered by them is rendered only as a collateral duty, responding solely to injuries resulting from workplace incidents within our facility.

DFW Moving Company

Housekeeping Schedule & Checklist

SCHEDULE

Following every incident where there is a possibility of the presence of residual bloodborne pathogens or other potentially infectious materials.

CHECKLIST

Only personnel who have had training in our Exposure Control will ensure that all surfaces are decontaminated and that cleaning materials are properly disposed of. Areas to consider include, but are not limited to:

	YES	NA
FLOORS	<input type="checkbox"/>	<input type="checkbox"/>
WALLS	<input type="checkbox"/>	<input type="checkbox"/>
EQUIPMENT	<input type="checkbox"/>	<input type="checkbox"/>
PRODUCT	<input type="checkbox"/>	<input type="checkbox"/>
WASTE CONTAINERS	<input type="checkbox"/>	<input type="checkbox"/>
TOOLS	<input type="checkbox"/>	<input type="checkbox"/>

Broken, potentially infected glassware should be picked up and disposed of using mechanical means such as a brush and dust pan or forceps.

All sharps will be stored in a manner that allows easy access and safe handling.

Infectious waste will be placed in containers that are color coded red. These containers will be decontaminated as soon as practical.

Subsequent to rendering any procedures, employees will ensure that all surfaces on which blood, body fluids, bloodborne pathogens, or other infectious materials may be present are cleaned with an appropriate disinfectant.

DFW Moving Company

Hepatitis B Declination Form

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

(WITNESS)

(EMPLOYEES SIGNATURE)

(PRINTED NAME)

(DATE)

DFW Moving Company

Annual Exposure Control Plan Review

This Exposure Control Plan was prepared:

At least annually, this program will be reviewed and, if necessary, updated to reflect innovations in procedures and technological developments that eliminates or reduces exposure to bloodborne pathogens.

As part of the annual review, the below will be considered:

- a. Employee Input
- b. Sharps Injury Log
- c. Exposure Incident Reports
- d. Professional Journals

Date Reviewed:

Signature

Title

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

DFW Moving Company

Exposure Incident Report

ALL INFORMATION ON THIS FORM IS TO REMAIN CONFIDENTIAL

THIS FORM WILL BE COMPLETED AS SOON AS FEASIBLE AFTER AN EXPOSURE INCIDENT BUT, UNDER NO CIRCUMSTANCES, AFTER THE SHIFT ON WHICH THE INCIDENT OCCURRED.

DATE: _____ TIME: _____

NAME OF EMPLOYEE: _____

ROUTE OF EXPOSURE: _____

SOURCE INDIVIDUAL'S NAME: _____

a. Above individual did / did not consent to be tested for HBV or HIV.

b. Testing was done by: _____

1. Results: _____

EMPLOYEE WAS OFFERED AND ACCEPTED: **NO** **YES**

a. Hepatitis Vaccination Series. [Date(s)] _____

1. If "NO", written declination was signed.

b. Post Exposure Evaluation and follow-up.

c. Employee consents to baseline blood collection. _____

(Signature)

Description of events leading to this exposure incident:

Corrective Measures to Prevent a Reoccurrence:

Jake Pritchard

Employee Signature

Forklifts

29 CFR 1910.178 - Powered Industrial Trucks

Overview

This program has been developed to make our truck operators aware of the hazards associated with motorized truck use as well as to provide guidance for safe truck operations.

Persons will be authorized to operate our forklifts only after they have successfully demonstrated their understanding of proper procedures for truck inspection, use, and refueling/recharging. Operators will demonstrate their truck knowledge and abilities by passing a written test and performing designated truck maneuvers. All truck operators will be evaluated by Jake Pritchard, our Forklift Program Administrator, or a designated competent person.

Because of their power, weight, size, restricted visibility, &, often, high center of gravity, operation of industrial trucks takes skill and attention to detail. One moment of inattention can lead to a major mishap in an instant. Additionally, the load presents potential hazards if not properly secured, balanced, and/or properly placed on the truck.

In accordance with 29 CFR 1910.178(b)12, Jake Pritchard, or other competent person, will determine whether the atmosphere or location in which our industrial trucks will operate is hazardous or non-hazardous &, after further assessing our needs, will determine which types of trucks are appropriate & allowed for our specific operations.

In the unlikely event that unsafe industrial motor truck operations are observed, retraining will be given with emphasis on correcting the improper behavior. To prevent the possibility of severe injury to the operator (or a bystander), our forklifts must be operated in a professional manner and anything less will not be tolerated.

All truck operators will have ready access to this program, appropriate OSHA standards, and the truck owner/operator manuals.

Forklifts

Forklifts are designed to move items quickly, safely, and cleanly. Forklift training would also apply to numerous types of powered industrial trucks such as: tractors, platform lift trucks, motorized hand trucks, and other specialized industrial trucks powered by electric motors or internal combustion engines.

While many safety features are designed into forklifts, accidents still happen, and they are generally the result of operator error.

There is a general agreement among safety professionals, as well as OSHA, that requiring training for all persons (including part-time, seasonal, and temporary employees) who operate forklifts will significantly reduce the accident and injury rates.

General Requirements

All truck operators must be thoroughly familiar with the truck, itself. This includes knowing:

- a. Instinctively, what each and every control does.
- b. How to perform a truck safety check.
- c. The truck's limitations such as maximum load, height and width, visibility, stability, and surface requirements.
- d. The truck's stopping and turning ability and its effect on loads.

The below safety rules and guidelines to which one must adhere while operating a forklift have been established. These rules are designed to protect the operator and/or persons adjacent to truck operations.

Specifically:

- a. No person will operate one of our trucks unless authorized in writing.
 1. Prior to authorization, the operator will have read this program, received training, passed a quiz on truck operations, and been evaluated on operational skills.
 2. Authorization to operate one type of truck does not automatically authorize a person to operate all trucks. Different power sources, visibility restrictions, controls, and capacities may dictate, in the judgment of Jake Pritchard, that a separate certification process may be required for a different type of truck. There may be instances where a new vehicle does not necessitate new training and a demonstration of proficiency. A newer model of a currently used truck may be identical to the truck the operator is qualified on as far as safety and operations are concerned. As a general rule, each type of truck has its own characteristics, limitations, and idiosyncrasies -- each model of a type of truck may or may not be unique.
- b. No riders are allowed on our forklift unless:
 1. The truck is specifically designed for such use.
 2. The rider is authorized by Jake Pritchard.

Note: Forklifts are generally designed to move product, supplies and equipment, not personnel.
- c. Jake Pritchard will revoke the authority to operate a truck if unsafe acts are observed or it is apparent that the operator has not retained the knowledge and job skills necessary to safely perform truck operations.
 1. An operator who has lost his authorization to operate a truck will be retrained, reevaluated, and, if appropriate, re-certified.
- d. At the beginning of each shift, the operator will inspect the truck using our Forklift Daily Checklist.
 1. If deficiencies relating to safety are found, the deficiencies will be noted on the Checklist and reported to Jake Pritchard or other designated person. The vehicle will not be used until safety defects are repaired.
 2. If cosmetic damage is discovered during the daily check, it will be noted on the Checklist, but the truck will be used. Cosmetic faults will not delay our operations.

Hazards

The major personal safety hazards involved in truck operation include:

- a. Physically hitting a person/object with the truck or load.
- b. Having a load fall and hit the operator or other person.
- c. Having the truck tip and crush the operator or other person.
- d. Fire or explosion during refueling/recharging.

Below are rules and guidelines to control the hazards identified & reduce the likelihood of accident/injury. While some of the procedures may seem too obvious to mention or just plain common sense, remember this —serious, even fatal, accidents have occurred because for one split second an operator forgot or ignored a basic safety rule.

Falling/Hitting a Person/Object:

- a. Never drive up to a person standing in front of a fixed object.
- b. When possible, stay within delineated travel lanes or aisles.
- c. Be seen and/or heard.
- d. Ensure that adequate lighting is available.
- e. Maintain a clear view of travel. If the load blocks or restricts the view, the operator will drive with the load trailing (backwards).
- f. Slow down, sound horn, and do not pass where vision is restricted.
- g. Operate the truck at speeds that will allow it and the load to be stopped in a safe, smooth, manner.
- h. Be aware of floor conditions. Remove loose objects that have found their way to the truck travel lanes. Operate the truck at slower speeds on wet or slippery floors.
- i. Of course, stunt or reckless driving is prohibited.
- j. Be aware of the height of the truck and, if equipped, its mast and load. Carelessness can damage ceiling, lights, pipes, etc.
- k. Never allow anyone to stand or pass under an elevated portion of any truck at any time.

Falling Loads:

- a. Know your load – do not “over stack.” Because practically all loads lifted or hauled by a forklift are not secured to the truck, ensure the load is properly stacked. Cartons generally should be interlaced or banded.
- b. If lifting a load or pallet, get the forks (or other engaging means) as far under the load as possible.
- c. Travel with the load in the lowest position for stability as well as prevention of hitting objects overhead. If using forks, tilt the load backward for stabilization.
- d. Do not exceed the truck’s rated capacity or stack loads too high.
- e. Do not make “jerky” movements such as slamming the brakes or high speed turns.
- f. A load backrest extension will reduce the possibility of part of the load falling rearward.
- g. When using a fork lift, the forks may be tilted forward only for picking up or setting down a load.

Tipping:

Forklifts are, by design, narrow allowing them greater access within the work setting. Unfortunately, a narrow track offers less stability. Tipping or falling off an edge (or dock) is a preventable accident by following the guidelines below. If your truck tips, keep your body and limbs within the safety of the cage. Wear a seat belt if the truck is so equipped.

- a. Stay within travel lanes.
- b. If entering a trailer, ensure:
 1. The trailer brakes are engaged.
 2. The trailer is secured from movement by means of chocks and/or a locking mechanism.

3. The tractor is either shut off or removed from the trailer.
4. The trailer is squared up with the dock opening and dock plates are secure.
5. The trailer floor is capable of supporting the forklift and its load.
6. The lighting within the trailer is adequate.

Note: Falling off a dock edge because a trailer has moved is invariably a serious accident. Do not count on the tractor-trailer driver to lock his brakes or even trust that his brakes work. Physically check and ensure that the trailer into which you are taking your forklift is flush against the dock. If possible, the trailer should be actually attached to the dock, but in all cases, it should be chocked.

- c. Travel with the load in the lowest possible position and avoid sharp turns at higher speeds as well as abrupt truck movements.
- d. Be aware of the surface on which you are traveling -- its traction, ability to hold weight, slope, and surface.

Fire/Explosion during Refueling/Recharging:

Refueling accidents are not common experiences, however should they occur, they would be sudden and possibly catastrophic. Follow the manufacturer's owner's manual and local fire laws.

- a. There is absolutely NO SMOKING or open flame during any portion of the refueling/recharging process.
- b. Per 29 CFR 1910.110, Storage and handling of liquefied petroleum gases, paragraph (f)(7), at least one approved portable fire extinguisher having a minimum rating of 8-B, C must be readily available when refueling propane.
- c. Facilities for quick drenching of the eyes and body must be readily available.

Other Concerns

The program deals primarily with the personal safety of our forklift operators. However, when discussing truck operations, we would be remiss if it were not pointed out that improper truck operations could also result in physical damage to products, trucks, and/or facilities. Proper truck operation will reduce personal injury accidents, and, as an added benefit, prevent general damage.

Operator Protection

A hazard assessment of forklift operations will be conducted by Jake Pritchard. Particular attention will be given to hand, head, eye, and foot protection, as well as environmental conditions such as atmospheres, heat, or cold. If the truck is equipped with a seat belt, it must be worn when the truck is moving.

Keep your limbs within the running lines of the truck and keep your hands and fingers away from moving parts -- particularly the mast on a fork lift truck.

Jake Pritchard will perform a hazard assessment of our truck operations and determine what, if any, personal protective equipment (PPE) requirements are appropriate. If PPE (examples: steel toed boots, leather gloves, hard hat, eye protection, etc.) is required, it must be worn.

Forklift Operations

In addition to safety operating practices previously identified in this manual, the following will be considered general operating procedures:

- a. Fire aisles, access to stairways, and fire equipment must be kept clear.
- b. Operators leaving their trucks must ensure the load is fully lowered, controls neutralized, and brakes set. On an incline, the wheels must be blocked. If the operator is 25 feet or more from the truck or does not have a clear view of the truck, the power to the truck must be shut off.
- c. A safe distance will be maintained from the edge of ramps or platforms while on any elevated dock, platform, or freight car.
- d. Trucks will not be used for opening or closing freight doors.
 1. Trucks, like all items of equipment, will be used for the purpose for which they were designed.
- e. Be aware that if the operator of a semi-trailer has placed the rear wheels in a far forward position, the trailer may act as a “teeter-totter” when a heavy forklift enters the trailer. When a trailer is not coupled to a tractor, fixed jacks may be necessary to support the semi-trailer during loading or unloading.
- f. Be aware that the overhead guard (used as protection against falling objects) is designed to prevent injury from the impact of small packages, boxes, bagged material, etc. -- it is not necessarily designed to withstand the impact of a falling capacity load.
- g. In the event persons are lifted by a truck, a lifting platform must be securely attached to the lifting mechanism and the persons on the safety platform must have means of shutting off power to the truck.
- h. If more than one truck is operated, they must be separated by a safe distance (at least three truck lengths) and they may not pass each other in intersections, blind spots, or other dangerous locations. The right of way will be yielded to other trucks in emergency situations.
- i. Trucks traveling in the same direction will not be passed at all.
- j. Driving on grades:
 1. Grades will be ascended or descended slowly.
 2. When ascending or descending grades in excess of 10 percent, loaded trucks will be driven with the load upgrade.
- k. Motorized hand trucks must enter confined areas with the load end forward.

Maintenance

While the operator is responsible for checking the truck before use, actual mechanical maintenance must be performed by an authorized person.

- a. If at any time a forklift is found to be in need of repair, defective, overheating, or in any way unsafe, the truck will be taken out of service until it has been restored to safe operating condition.
- b. Forklifts should be kept reasonably clean and free of excess oil and grease.

Duties of our Forklift Administrator

The duties of Jake Pritchard include:

- a. Operator training and certification.
- b. Hazard assessment of our truck operations.
- c. Identification of truck operators who, through their performance have demonstrated a lack of retained knowledge or ability to safely operate a powered truck. These people will receive retraining.
- d. Keeping up-to-date of developments in the materials handling field with an emphasis on safety.

Additionally, Jake Pritchard will ensure that all truck operators have ready access to 29 CFR 1910.178, Powered Industrial Trucks, this program, and the individual truck's Operator/Owner Manual.

Training

will administer the training portion of this program.

Interactive training will be given by a competent (one with knowledge, training, and experience) person with ample opportunity to ask questions and clarify all aspects of truck operation relating to safety.

Prior to actual truck operation on the job, all truck operators will become familiar with the contents of this program as well as the operator's manual applicable to the specific powered truck they will operate. Each operator will demonstrate an understanding of truck operations and complete a driving test which will include truck inspection, maneuvering, and fueling/charging.

New truck operators may operate powered trucks in a training capacity:

- a. When they are under the direct supervision of persons who have the knowledge, training, and experience to train and evaluate their competence.
- b. Where such operation does not endanger themselves or others.

will ensure that all truck operators have a complete understanding of the below listed topics:

Truck-Related Topics:

- a. Operating instructions, warnings, and precautions for the type of truck the operator will be authorized to operate.
- b. Differences between the truck and the automobile.
- c. Truck controls and instrumentation: where they are located, what they do, and how they work.
- d. Engine or motor operation.
- e. Steering and maneuvering.
- f. Visibility (including restrictions due to loading).
- g. Fork and attachment adaptation, operation, and use limitations.
- h. Vehicle capacity.
- i. Vehicle stability.

- j. Any vehicle inspection & maintenance that the operator will be required to perform.
- k. Refueling and/or charging and recharging of batteries.
- l. Operating limitations.
- m. Any other operating instructions, warnings, or precautions listed in the operator's manual for the types of vehicle that the employee is being trained to operate.

Work-Related Topics:

- a. Surface conditions where the vehicle will be operated.
- b. Composition of loads to be carried and load stability.
- c. Load manipulation, stacking, and unstacking.
- d. Pedestrian traffic in areas where the vehicle will be operated.
- e. Narrow aisles and other restricted places where the vehicle will be operated.
- f. Hazardous (classified) locations where the vehicle will be operated.
- g. Ramps and other sloped surfaces that could affect the vehicle's stability.
- h. Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of carbon monoxide or diesel exhaust.
- i. Other unique or potentially hazardous environmental conditions in the work area that could affect safe operation.

Refresher training in relevant topics will be provided to the operator when:

- a. If unsafe truck operations are observed.
- b. After an accident or near-accident.
- c. Operator has received an evaluation that reveals that the operator is not operating the truck safely
- d. If the operator is to be assigned to drive a different type of truck.
- e. If work area changes could affect safe operation of the truck.

An evaluation of each powered industrial truck operator's performance must be conducted at least once every three years and refresher training will be provided as needed.

Hazard Communication

[29 CFR 1910.1200, Hazard Communication](#)

[29 CFR 1910.1200 Appendix A, Health Hazard Criteria \(Mandatory\)](#)

[29 CFR 1910.1200 Appendix B, Hazard Determination \(Mandatory\)](#)

[29 CFR 1910.1200 Appendix C, Allocation of Label Elements \(Mandatory\)](#)

[29 CFR 1910.1200 Appendix D, Safety Data Sheets \(Mandatory\)](#)

[29 CFR 1910.1200 Appendix E, Definition of "Trade Secret" \(Mandatory\)](#)

Purpose

The purpose of our hazard communication program is to ensure that the hazards of all chemicals produced or imported are classified, and that information concerning the classified hazards is transmitted to our employees. The provisions of our hazard communication program are consistent with the provisions of the United Nations Globally Harmonized System of Classification and Labeling of Chemicals (GHS), Revision 3. The transmittal of information is to be accomplished by means of our comprehensive hazard communication program.

We will develop, implement, and maintain **at each workplace** a comprehensive written hazard communication program for our employees which includes container labeling and other forms of warning, safety data sheets and employee training.

Note: Where employees must travel between workplaces during a work shift, *i.e.*, their work is carried out at more than one geographical location, the safety data sheets may be kept at the primary workplace facility. In this situation, the employer will ensure that employees can immediately obtain the required information in an emergency.

Hazard communication applies to any hazardous substance which is known to be present in the work place in such a manner that employees may be exposed under normal conditions of use or in a reasonably foreseeable emergency resulting from work place operations.

Manufacturers and importers will obtain or develop a safety data sheet for each hazardous substance they produce or import. We will obtain from the manufacturer or seller an SDS of each hazardous substance which we use.

We will maintain a list of the hazardous substances known to be present using an identity that is referenced on the appropriate SDS. This list may be compiled for the workplace as a whole or for individual work areas.

We will also maintain copies of the required SDS for each hazardous chemical & will ensure that they are readily accessible to each employee when they are in their work areas.

Electronic access and other alternatives to maintaining paper copies of the safety data sheets are permitted as long as no barriers to immediate employee access in each workplace are created by such options.

As a matter of course, before a new product is purchased, we will review its SDS to determine the presence of carcinogenic or other extremely hazardous chemicals. Using this information from the SDS, we will be able to inform employees how they will be protected from carcinogens at the workplace.

Prior to performing a non-routine task (for example, the cleaning of reactor vessels), an employee will be given information by a competent person or supervisor concerning the hazardous chemicals to which he may be exposed. This information will include:

- a. Specific chemical hazards
- b. Protective/safety measures the employee is to use.
- c. Measures taken to lessen the hazards including ventilation, respirators, presence of another employee and emergency procedures.

Should work activities be performed in areas where chemicals are transferred through unlabeled pipes, the employee will be informed by the competent person or supervisor of:

- a. The chemical in the pipes.
- b. Viscosity, pressure, heat.
- c. Potential Hazards.
- d. Safety precautions to be taken.

In multi-employer workplaces, our written hazard communication program will include the methods we will use to inform any other employers sharing the same work area of the hazardous chemicals to which their employees may be exposed while performing their work, & any suggestions for appropriate protective measures, including the following:

The competent person at the workplace will inform those with whom DFW Moving Company work of any hazardous chemical products we are using & will provide them with the appropriate SDS for their review. SDS for all chemical products used at the workplace will be readily available.

Should DFW Moving Company introduce a new chemical product to the facility that contains a physical or health safety hazard, the product's SDS will accompany that product and, before use, employees will be given instruction on the products hazards.

Labels and Other Forms of Warning

The manufacturer, importer, or distributor will ensure that each container of hazardous chemicals leaving the workplace is labeled, tagged or marked. Where the manufacturer or importer is required to label, tag or mark the following information will be provided:

- a. Product identifier;
- b. Signal word;
- c. Hazard statement(s);
- d. Pictogram(s);
- e. Precautionary statement(s); and,
- f. Name, address, and telephone number of the manufacturer, importer, or other responsible party.

The manufacturer or importer preparing the safety data sheet will ensure that the information provided accurately reflects the scientific evidence used in making the hazard determination. If the manufacturer or importer, become aware of any significant information regarding the hazards of a chemical, or ways to protect against the hazards, this new information will be added to the safety data sheet within three months. If the chemical is not currently being produced or imported, the manufacturer or importer will add the information to the safety data sheet before the chemical is introduced into the workplace again. DFW Moving Company will replace safety data sheets with updated copies as they are received.

Product identifier and words, pictures, symbols, or combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

Example below for labeling:

<p>HS85 Batch number: 85L6543</p>  <p>Warning Harmful if swallowed</p> <p>Wash hands and face thoroughly after handling. Do not eat, drink or smoke when using this product. Dispose of contents/container in accordance with local, state and federal regulations.</p> <p>First aid: If swallowed: Call a doctor if you feel unwell. Rinse mouth.</p> <p>GHS Example Company, 123 Global Circle, Anyville, NY 130XX Telephone (888) 888-8888</p>
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We may use signs, placards, process sheets, batch tickets, operating procedures, or other such written materials in lieu of affixing labels to individual stationary process containers, as long as the alternative method identifies the containers to which it is applicable and conveys the information required by the above to be on a label. The written materials will be readily accessible to the employees at DFW Moving Company in their work area throughout each work shift. We may use such written materials in lieu of affixing labels to individual containers as long as the alternative method identifies and accompanies the containers to which it is applicable and conveys the information required to be on a label.

We **are not required** to label portable containers into which hazardous chemicals are transferred from labeled containers, and which are intended only for the immediate use of the employee who performs the transfer.

We will not remove or intentionally deface existing labels on incoming containers of hazardous chemicals, unless the container is immediately marked with the required information.

We will ensure that workplace labels or other forms of warning are legible, in English, and prominently displayed on the container, or readily available in the work area throughout each work shift. If we have employees who speak languages other than English, we will add the information to the presented material translated to the appropriate language and the information will be presented in their language.

Note: OSHA pictograms do not replace the diamond shaped labels that the U.S. Department of Transportation (DOT) requires for the transport of chemicals, including chemical drums, chemical totes, tanks, or other containers. Those labels must be on the external part of a shipped container and meet the DOT requirements set forth in 49 CFR 172, Subpart E.

Employee Information and Training

DFW Moving Company will provide employees with effective information and training on hazardous chemicals in their work area at the time of their initial assignment, and whenever a new chemical hazard is introduced into their work area. Information and training may relate to general classes of hazardous chemicals to the extent appropriate and related to reasonably foreseeable exposures of the job. Chemical-specific information must always be available through labels and safety data sheets.

Information and training will consist of at least the following topics:

- a. Employees will be informed of the requirements of 29 CFR 1910.1200, Hazard Communication, and its appendices.
- b. Employees will be informed of any operations in their work area where hazardous chemicals are present.
- c. Employees will be informed of the location and availability of the written hazard communication program, including the list(s) of hazardous chemicals and safety data sheets required by this section.
- d. Employees will be trained in the methods and observations that may be used to detect the presence or release of a hazardous chemical in the work area (such as conducting specific monitoring, using continuous monitoring devices, learning the visual appearance or odor of hazardous chemicals when being released, etc.).
- e. Employees will be trained in the physical, health, simple asphyxiation, combustible dust and pyrophoric gas hazards, as well as hazards not otherwise classified, of the chemicals in the work area, and the measures they can take to protect themselves from these hazards, including specific procedures that DFW Moving Company has implemented to protect our employees from exposure to hazardous chemicals, such as appropriate work practices, emergency procedures, and personal protective equipment to be used.
- f. Our employees will be trained in the details of our hazard communication program, including an explanation of the labels received on shipped containers and the workplace labeling system used by their employer and the safety data sheet, and how our employees can obtain and use the appropriate hazard information.

Documentation of Training

Documentation of safety and health training will be maintained for at least one (1) year.

Documentation will include:

- a. employee name or other identifier
- b. training dates
- c. type(s) of training
- d. training providers

Employees will be informed employees of the right:

- a. To personally receive information regarding hazardous substances to which they may be exposed, according to the provisions of this section;
- b. For their physician or collective bargaining agent to receive information regarding hazardous substances to which the employee may be exposed according to provisions of this section;
- c. Against discharge or other discrimination due to the employee's exercise of the rights afforded pursuant to the provisions of the Hazardous Substances Information and Training Act.

Whenever DFW Moving Company receives a new or revised safety data sheet, such information will be provided to employees on a timely basis not to exceed 30 days after receipt, if the new information indicates significantly increased risks to, or measures necessary to protect, employee health as compared to those stated on a safety data sheet previously provided.

DFW Moving Company

Request for Safety Data Sheets

TO:

(Date)

(Supplier)

(PO Box/Street Address)

(City, State, ZIP)

To whom it may concern:

On _____, we received a shipment of _____,
(Date) (Product Name)

Reference Invoice: _____.
(Invoice Number)

The above product was received without an accompanying Safety Data Sheet (SDS).
Per 29 CFR 1910.1200, we are unable to use this product without its SDS.

Please furnish the appropriate SDS as soon as possible to:.

DFW Moving Company

815 Brazos St STE 500
Austin, TX 78701
4699014871

Thank you,

Oleksii Dudar
Safety Director

Personal Protective Equipment – General

[29 CFR 1910.132 - General Requirements](#)

[29 CFR 1910.133 - Eye and Face Protection](#)

[29 CFR 1910.135 - Head Protection](#)

[29 CFR 1910.136 - Occupational Foot Protection](#)

[29 CFR 1910.138 - Hand Protection](#)

Overview

This Personal Protective Equipment (PPE) Program has been prepared to inform our employees of potential hazards at our facility and to identify the proper PPE to be used to reduce or eliminate these hazards. This Program relies on a cooperative effort by all personnel to understand the reasons for PPE and to protect themselves from harm.

The use of PPE does not lessen an employee's obligation to use safe work practices and procedures. Employees are expected to be aware of the hazards within their area of responsibility and properly use prescribed PPE.

Our operations, work methods, and individual facility present specific hazards which must be identified, analyzed, and matched with the appropriate PPE through a continuing hazard assessment process.

A Certificate of Hazard Assessment will be kept at the facility for inspection purposes.

Duties of the PPE Program Administrator

The primary duties of Jake Pritchard, our Program Administrator include: hazard assessment; PPE selection; PPE training; and monitoring of our PPE Program. Certain types of PPE may require hands-on training before on the job use (primarily for sizing and fitting) and this training may be further delegated to competent persons.

Hazard Assessment and PPE Selection

A careful, systematic personal protective equipment selection process is used to identify what, if any, protection is required to reduce or eliminate the possibility of eye, hand, foot, limb, or head injury.

Hazard assessment, performed by Jake Pritchard, or a designated competent person, starts with a thorough knowledge of our facility, work procedures, and methods of operation. The basic hazard categories are: impact, penetration, compression, chemical, heat, harmful dust, and light radiation.

Identifying the source of the above hazards allows for consideration of administrative or engineering controls to eliminate the hazard as opposed to providing protection against it. Examples would include: redirecting traffic flow, ventilation, temporary weather barriers, non-slip surfaces, etc.

Because administrative and engineering controls are passive -- no employee involvement is required -- they are preferable to PPE.

A PPE selection is made by analyzing the above information and evaluating the type of risk, the level of risk, the potential for injury and the possible seriousness of that injury. PPE, which is compatible with the above risks and work situation, is considered. Actual selection involves all the above factors plus an attempt to provide a level of protection greater than the minimum required.

In all situations where it has been determined that a particular type of PPE is to be used, it will be used. There will be no exceptions, by virtue of position or rank, to this policy. Within an area at the facility where the possibility of falling objects exists, hard hats will be worn. It follows that once an item of PPE (hard hat, in this case) is selected, it must be used by all persons in the identified area regardless of job title or function.

Having Jake Pritchard, or designated competent person, at the facility determine the PPE requirements allows for knowledgeable selection and consistency, and eliminates chaos that would result if each individual were to decide when, where, and if PPE should be used.

29 CFR 1910 Subpart I - Appendix B, Non-mandatory Compliance Guidelines for Hazard Assessment and Personal Protective Equipment Selection, provides excellent selection guidelines for eye and face protection, head protection, foot protection, and hand protection.

Dissemination of PPE Selection Information

Employees must understand when PPE is necessary and what type(s) of PPE are necessary.

All persons for whom PPE will provide a measure of safety will be given appropriate training on that item of PPE as well as an explanation of the importance of its use.

ANSI Standards and PPE

Most items of PPE are manufactured in accordance with a specific American National Standards Institute (ANSI) standard. For example, protective eye and face devices purchased after 07/05/94 must comply with ANSI standard ANSI Z87.1-1989, American National Standard Practice for Occupational and Educational Eye and Face Protection; protective helmets purchased after 07/05/94 must comply with ANSI standard ANSI Z89.1-1986, American National Standard for Personnel Protection-Protective Headwear for Industrial Employees-Requirements.

PPE safety products are tested to ensure they meet ANSI standards. Because products are tested in the manner in which they are designed to be used, ANSI certification is valid only if the user follows the manufacturer's instructions for proper sizing, fitting, wearing, and adjusting. A review of OSHA citations reveals that fines can be levied because employees were improperly using PPE. For example, a hard hat worn with the bill toward the rear may provide adequate protection from impact; however, because it is tested with the bill toward the front, this improper use is cause for a safety violation.

PPE will be provided to our employees at no cost to them. Prior to purchase, items of selected PPE will be checked to ensure they were manufactured in accordance with the proper ANSI standard.

The importance of hazard assessment takes on added significance when judgments are made matching the hazard to the protection desired in cases where ANSI certification is not available. What matters most is: does the selected PPE do what it is intended to do?

Employee owned PPE must be approved for use by Jake Pritchard. Further, such equipment must be properly maintained and cleaned in accordance with the manufacturer's instructions.

Sizing and Fitting

The word “personal” in the phrase “personal protective equipment” correctly implies that the equipment is for a specific person. As such, sizing and fitting are important for a variety of reasons.

- a. Function: An improperly fitted piece of PPE may not do its job. For example, eye protection against dust must have an excellent face seal.
- b. Comfort: The likelihood of continued use is increased if the PPE selected is comfortably fitted. Example: gloves that fit poorly and, over time, make a person’s hands hot and clammy are likely to be removed exposing that person to the hazard for which the gloves were required in the first place.
- c. Safety: Ill-fitting PPE may actually cause an accident. Example: loose hard hat may slip and block one’s vision.

Most PPE come in a variety of sizes and within those size groups, adjustments may be made to affect a perfect fit. It is important to understand the procedures for donning, adjusting, using, and removing PPE. Each person who is required to use any type of PPE will be taught, before initial issue, the specific procedures for properly donning, adjusting, using, and removing the specific PPE. This instruction will generally be given by the employee’s Supervisor. When available, the manufacturer’s instructions will be issued with the PPE.

Care and Maintenance of PPE

PPE will be visually inspected before each use and if defects are noticed, it will not be used. Some types of PPE are expendable (cotton gloves) and have a limited life span after which they are discarded, and new PPE is reissued. Plastic safety glasses become scratched and they too must be exchanged for new ones when vision is impaired. Other types of safety equipment consist of both non-expendable and expendable components. A cartridge respirator is an example of this, with the respirator being non-expendable while the cartridges “wear out” and become expendable (discarded and replaced). PPE will be maintained in accordance with the manufacturer’s instructions and, where appropriate, kept in a sanitary condition.

Cleanliness takes on an added importance when dealing with PPE designed to protect the eyes and face. Dirty or fogged lenses can impair vision and, rather than offer protection from a hazard, actually becomes a contributory factor in causing an accident. Lastly, should PPE become contaminated with a chemical substance and decontamination is impossible, the PPE will be properly disposed of following the disposal instructions on the Safety Data Sheet, or SDS, for that substance.

Training

Affected employees will be given an understanding of:

- a. When PPE is necessary.
- b. What PPE is necessary.
- c. How to properly put on, take off, adjust, and wear PPE.
- d. The limitations of the PPE.
- e. The proper care, maintenance, useful life and disposal of the PPE.

Retraining will be given in situations when changes in PPE requirements render the previous training obsolete or it is noticed that an employee is not following our PPE policies -- specifically, not properly wearing the selected PPE in identified locations or work situations.

Eye and Face Protection

29 CFR 1910.133 - Eye and Face Protection

Your eyes are a marvel of engineering. Most of us take them for granted as we do all our senses, until an accident, injury, or disease forces us to realize the miracle we lost or almost lost. Can you imagine a system that can take (absorb) light and convert it to electrical signals (by way of the 120 million rods and 6 million cones on the retina) and transfer these signals through an optic nerve which has about one million fibers directly into the brain?

Most of us see the world in living color and with depth perception. The body itself does much to protect the eyes. Bony eye sockets in the skull protect the eye from many mechanical injuries. Orbital fluids and tissues cushion direct blows. Eyelids close reflexively from visual or mechanical stimuli. Eyes reflexively rotate upward with the lid closing to protect the cornea. Tears can flush away chemicals and foreign bodies. We all come with these safeguards. Sometimes, they are not enough.

Eye protection is required when there is a possibility of eye injury. Eye injury is not confined to flying objects. Eye injury can be caused by bright light, dust, chemicals, heat, and, literally, anything that can reach them. Different hazards require different types of protection.

Eye (and face) protection is required when one is exposed to flying particles, chemicals, or injurious light radiation. Types of eye protection include: impact resistant safety glasses, safety glasses with side shields, goggles, goggles with a face seal, face masks, and shaded goggles with varying degrees of darkness.

Affected employees who wear prescription lenses will wear eye protection over the prescription lenses without disturbing the proper positioning of the prescription lenses or will wear eye protection that incorporates their prescription into the design.

All prescription glasses should be made with impact-resistant lenses. Hardened lenses, through a tempering process, are extremely hard and resistant to impact and breakage. Safety lenses are similar to hardened lenses but are 1 mm thicker. Safety lenses are used in goggles where there is a danger of flying glass or chips of metal.

All employees who wear contact lenses must also wear appropriate eye and face protection in hazardous environments.

Welding helmets and face shields, if required, should be worn over primary eye protection (spectacles or goggles).

An inexpensive pair of safety glasses can save your priceless eyesight.

Head Protection

Talking about head protection is really talking about brain protection. Your brain, either through divine providence, evolution, or quirk of nature, is you. The brain, that soft mass of gray and white convoluted matter, is what you are all about. Destroy your brain and you no longer exist.

Your brain is naturally protected by a cranium. Your skull actually has many bones which protect your brain and support your face. Obviously, there are other parts to your head which need protecting such as your eyes, ears, nose, tongue, skin, etc., but your brain is the most important.

Head protection is required when there is a possibility of injury to the head from falling objects and when working near exposed electrical conductors which could contact the head.

Brain injury is the second most common cause of major neurologic deficits and causes more deaths than injury to any other organ.

When the skull receives an impact, it actually can indent and deform. A fracture may occur and the fracture may be distant from the point of impact. A direct blow to the head can cause the brain to actually move within the skull. Surprisingly, there is often a reverse correlation between skull damage and brain damage. Just because there is no external visible injury to the skull does not preclude the possibility of brain injury.

Wearing head protection (a hard hat) accomplishes two major objectives: it reduces the rate of energy transfer and spreads out the area of energy transfer. Just as your head should be checked out at a hospital after a head impact, so should your hard hat. A hard hat can absorb energy by destructing and this destruction may be unnoticeable.

A head injury may occur after a blow to the head and the following symptoms may be present: unconsciousness or disorientation, confusion, nausea, vomiting, and/or double vision. Get medical help immediately. Cover open wounds lightly with sterile dressing. Keep victim still, warm, and reassured. DO NOT move the victim unless he/she would be in greater danger if you did not. DO NOT apply pressure to a head wound. DO NOT try to stop blood or clear fluid coming from ears, nose, or mouth.

Foot Protection

When purchasing new protective footwear, ensure that it complies with ASTM F-2412-2005, "Standard Test Methods for Foot Protection," and ASTM F-2413-2005, "Standard Specification for Performance Requirements for Protective Footwear."

Specific hazards require specific types of protective footwear. Certain types of footwear can offer traction, crush protection, penetration protection, electrical protection, chemical resistance, heat and/or fire resistance, dryness, cushion, or ankle-protection. Further, certain activities may require a combination of these features.

Your foot is a remarkable piece of engineering which is composed of 26 bones, muscles, fatty tissue, nerves, tendons, skin and joints. The foot itself can absorb a tremendous amount of punishment without damage. But there are limits and it would be a shame to lose a foot, or part of a foot, because of failure to wear the prescribed protective footwear.

Hand Protection

Your hand is composed of 20 muscles, 3 major nerves, and 27 bones (14 of which are in your fingers) plus skin, fatty tissue, tendons, and joints. There are 15 muscles in your forearm which provide power to your hand. Your hand is your gateway to the world. It lets you do what you think. Its function is feeling and grasping.

Try to pick up something while holding your thumb still. It is very difficult. If the nerve to the small muscles of the thumb is severed, 80% of the total hand function is lost.

There are numerous types of hand protection (gloves) available -- each with a specific purpose. The most common are general purpose cotton work gloves which provide protection from minor skin abrasions and cold. However, there are many other types of gloves. Hands need protection from chemicals, abrasions, cuts and lacerations, temperature extremes, germs, radiation, impact, punctures, electricity, and other hazards on the facility. Specific job requirements determine the type of hand protection needed. Proper hand protection must do more than protect your hand; it must allow you to accomplish your job assignment with efficiency as well as safety.

Wearing hand protection could prevent your hand and/or fingers from being severed, burned, crushed, punctured, lacerated, cut, or generally abused.

Respiratory Protection

Employees who, by nature of their work, are exposed to harmful aerosols, vapors, gases, contaminated air, or non-breathable air will be provided air purifying or air supplying respirators after training, medical evaluation, and fit testing per our Respiratory Protection Program. The one exception is dust masks worn solely for comfort and not for respiratory protection.

Miscellaneous Personal Protection

PPE immediately brings to mind eye, head, hand, and foot protective equipment. However, there may be other types of protective equipment which are readily available and which have the capability of protecting employees from identified hazards on the facility. Some of these items may not fall under a specific OSHA standard or may not be ANSI approved or disapproved; however, in the judgment of Jake Pritchard, they may be appropriate for use in our operations.

Summary

The true beneficiary of PPE utilization is the user. The whole thrust of this Program is to protect our employees from injury. This is accomplished by, among other things, explaining the process of hazard assessment, the reasons for PPE use, and the necessity of using the PPE selected.

What possible justification could there be for maiming, losing, or even slightly injuring a body part because available (and required) PPE was not used? "I forgot"; "I was in a hurry"; "I misplaced my PPE"; "I felt silly wearing PPE"; or "I really didn't believe PPE was necessary" will not undo what could be a lifetime of regret.

DFW Moving Company

Certificate of Workplace Hazard Assessment

In accordance with 29 CFR 1910.132(d)(2), I certify that, this date, I have performed a hazard assessment of our facility located at:

815 Brazos St STE 500

Austin, TX 78701

4699014871

This hazard assessment was performed to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE).

Identified hazards which cannot be eliminated through engineering controls or changes in procedures will be addressed by the use of selected PPE.

All affected employees will be informed of the required PPE for specific work locations or specific types of work to be performed and will receive initial training or retraining, if necessary, before being allowed to perform work requiring PPE.

If conditions or procedures change, a reassessment will be made.

Jake Pritchard

PPE Program Administrator

Date

Personal Protective Equipment - Hearing Conservation

29 CFR 1910.95 - Occupational Noise Exposure

Overview

This Hearing Conservation Program is designed for one purpose – to prevent hearing damage caused by occupational noise exposure.

Most forms of personal protective equipment (PPE) are a response to an obvious hazard and are easy to understand. A hard hat will protect your head from falling objects, for example.

Hearing protection is different from most other types of PPE because loss of hearing generally occurs painlessly over a period of time and, when finally realized, the damage is permanent.

Because of the above, it is vital that cooperation between all affected employees & management be established to prevent occupational hearing loss. To achieve this goal, our Hearing Conservation Program focuses on the effects of noise on hearing as well as the selection & use of hearing protectors. Information is provided on how sound is transmitted to your brain, & lastly, the actual application of our Hearing Conservation Program.

While our Hearing Conservation Program has all the elements required of a complete safety program, it is not necessary to understand all the technical formulas and procedures that are required of licensed monitors, doctors, and hygienists. Individual employees are required to wear appropriate hearing protection when so directed and to understand the importance of protecting their hearing from damage. If workplace noise bothers you and those noises are below the threshold for required ear protection, you should bring this to the attention of Jake Pritchard, our Hearing Conservation Program Administrator for resolution.

Wherever it is not feasible to reduce the noise levels or duration of exposures to those specified in Table G-16, below, ear protective devices will be provided and used.

TABLE G-16 - PERMISSIBLE NOISE EXPOSURES	
<u>Duration per day, hours</u>	<u>Sound level dBA slow response</u>
8	90
6	92
4	95
3	97
2	100
1 1/2	102
1	105
1/2	110
1/4 or less	115

Hearing damage is caused by noise level and duration of exposure to the noise. If, after using the formula below, the equivalent noise exposure exceeds unity (1), then a Hearing Conservation Program will be initiated.

$F(e) = (T(1) \text{ divided by } L(1)) + (T(2) \text{ divided by } L(2)) + \dots + (T(n) \text{ divided by } L(n))$ where:

F(e) = The equivalent noise exposure factor.

T = The period of noise exposure at any essentially constant level.

L = The duration of the permissible noise exposure at the constant level (from Table G-12).

If the value of F(e) exceeds unity (1) the exposure exceeds permissible levels.

A sample computation showing an application of the formula in paragraph (d)(2)(ii) of this section is as follows. An employee is exposed at these levels for these periods:

110 db A 1/4 hour.

100 db A 1/2 hour.

90 db A 1 1/2 hours.

$F(e) = (1/4 \text{ divided by } 1/2) + (1/2 \text{ divided by } 2) + (1 \text{ 1/2 divided by } 8)$

$F(e) = 0.500 + 0.25 + 0.188$

$F(e) = 0.938$

Since the value of F(e) does not exceed unity, the exposure is within permissible limits.

Hearing protection is different from most other types of PPE because loss of hearing generally occurs painlessly over a period of time and, when finally realized, the damage is permanent.

As one would reasonably expect, acoustic trauma to your hearing can cause instant and permanent damage.

The initial determination of excessive noise levels is generally subjective. Indications of excessive noise would include: actual information pertaining to specific machines, personal observation, complaints from employees, and noticed indications of hearing loss. It is requested that employees draw attention to work situations where there is an apparent loudness that possibly requires hearing protection.

Duties of the Program Administrator

The duties of Jake Pritchard, our Hearing Conservation Program Administrator, include identifying work areas where the equivalent noise exposure factor exceeds unity, determining what types of noise level monitoring may be necessary, and ensuring that all personnel who are directed to wear hearing protection are trained in its proper use, cleaning, and storage.

Jake Pritchard will also be responsible for recordkeeping, testing, and training. Lastly, Jake Pritchard will keep abreast of developments in the hearing conservation field and he is encouraged to seek outside professional help when needed.

When a Hearing Conservation Program is Required

The industry standard that deals with occupational noise exposure, 29 CFR 1910.95 - Occupational Noise Exposure, is what this program is based.

Hearing protection will be provided at 85 dbA or greater **or** when it is not feasible to reduce the noise levels or duration of exposures to those specified in Table G-16 below, ear protective devices will be provided and used.

TABLE G-16 - PERMISSIBLE NOISE EXPOSURES	
Duration per day, hours	Sound level dbA slow response
8	90
6	92
4	95
3	97
2	100
1 1/2	102
1	105
1/2	110
1/4 or less	115

Footnote¹ When the daily noise exposure is composed of two or more periods of noise exposure of different levels, their combined effect should be considered, rather than the individual effect of each. If the sum of the following fractions: $C(1)/T(1) + C(2)/T(2) + \dots + C(n)/T(n)$ exceeds unity, then, the mixed exposure should be considered to exceed the limit value. C_n indicates the total time of exposure at a specified noise level, and T_n indicates the total time of exposure permitted at that level.

- C** = total length of work day in hours
- T** = period of noise exposure at any essentially constant level
- C(n)** = total time of exposure at a specific noise level
- T(n)** = total time of exposure permitted at that level

Footnote² When the daily noise exposure is composed of two or more periods of impulsive or impact noise should not exceed 140 dB peak sound pressure level.

A continuing, effective hearing conservation program will be administered when employees are exposed to sound levels greater than 85 dbA on an 8 hour time-weighted average basis.

This Hearing Conservation Program must be implemented when the equivalent noise exposure exceeds unity (the number 1) using the below formula and example:

$$F(e) = (T(1) \text{ divided by } L(1)) + (T(2) \text{ divided by } L(2)) + (T(n) \text{ divided by } L(n))$$

where:

- F(e)** = The equivalent noise exposure factor.
- T** = The period of noise exposure at any essentially constant level.
- L** = The duration of the permissible noise exposure at the constant level (from TABLE G-16).

If the value of $F(e)$ exceeds unity (1) the exposure exceeds permissible levels.

Because the action level is an 8-hour time-weighted average of 85 decibels measured on the A-scale, slow response, we will implement a monitoring program when this level is reached.

A sample computation showing an application of the formula is as follows.

An employee is exposed at these levels for these periods:

110 db A 1/4 hour

100 db A 1/2 hour

90 db A 1 1/2 hours

$F(e) = (1/4 \text{ divided by } 1/2) + (1/2 \text{ divided by } 2) + (1 \text{ } 1/2 \text{ divided by } 8)$

$F(e) = 0.500 + 0.25 + 0.188$

$F(e) = 0.938$

Since the value of F(e) does not exceed unity, the exposure is within permissible limits.

Definitions

There are certain words in our Hearing Conservation Program which are not used in everyday life. So that all may have a clearer understanding of this program, the below definitions are presented:

Action Level means an 8-hour time-weighted average of 85 decibels measured on the A-scale, slow response, or equivalently, a dose of fifty percent.

Attenuate means to lessen the intensity.

Audiogram means a chart, graph, or table resulting from an audiometric test showing an individual's hearing threshold levels as a function of frequency.

Audiologist means a professional, specializing in the study and rehabilitation of hearing, who is certified by the American Speech-Language-Hearing Association or licensed by a state board of examiners.

Baseline Audiogram means the audiogram against which future audiograms are compared.

Criterion Sound Level means a sound level of 90 decibels.

Decibel (dB) means unit of measurement of sound level.

Dosimeter means an instrument that integrates a function of sound pressure over a period of time in such a manner that it directly indicates a noise dose.

Hertz (HZ) means unit of measurement of frequency, numerically equal to cycles per second.

Medical Pathology means a disorder or disease which should be treated by a physician specialist.

NIHL means noise Induced Hearing Loss.

Noise Dose means the ratio, expressed as a percentage, of:

1. the time integral, over a stated time or event, of the 0.6 power of the measured SLOW exponential time-averaged, squared A-weighted sound pressure and
2. the product of the criterion duration (8 hours) and the 0.6 power of the squared sound pressure corresponding to the criterion sound level (90 dB).

Otolaryngologist means a physician specializing in diagnosis and treatment of disorders of the ear, nose and throat.

Representative Exposure means measurements of an employee's noise dose or 8-hour time-weighted average sound level that the employers deem to be representative of the exposures of other employees in the workplace.

Sound Level means ten times the common logarithm of the ratio of the square of the measured A-weighted sound pressure to the square of the standard reference pressure of 20 micro pascals. Unit: decibels (dB). For use with OSHA standard 29 CFR 1910.95, SLOW time response is required.

Sound Level Meter means an instrument for the measurement of sound level.

Time-Weighted Average means that sound level, which if constant over a sound level 8-hour exposure, would result in the same noise dose as is measured.

Noise Monitoring Procedures

Initially, the implementation of a noise monitoring program is the result of subjective reasoning by Jake Pritchard. Indications of excessive noise would include: actual information pertaining to specific machines, personal observation, complaints from employees, and noticed indications of hearing loss. It is requested that employees draw attention to work situations where there is an apparent loudness that possibly requires hearing protection.

The measure of a sound's strength is referred to as "sound level" and it is measured in units called "decibels" (dB).

To provide some idea of the loudness of 85 dB, the following comparisons are provided:

<u>Sound of</u>	<u>Approximate Decibels</u>
Softest sound heard with normal hearing	0 dB
Ordinary speech at conversational distance	65 dB to 70 dB
Telephone dial tone	80 dB
Train whistle at 500 feet	90 dB
Power mower	107 dB
Jet engine at 100 feet	140 dB
Gun Shot	140 dB

Sound levels above 80 dB may become uncomfortable; sound above 125 dB may be painful.

Individual occupational sound exposures above 85 dB do not trigger the need for noise monitoring or a Hearing Conservation Program -- it is when the equivalent noise exposure factor exceeds unity. The two factors that cause occupational hearing loss are: 1) loudness and 2) the duration of time one is exposed to that loudness. **In spite of the above**, when information indicates employee exposure may equal/exceed the 8 hr time-weighted avg. of 85 decibels, the monitoring program will be implemented to identify employees to be included in the hearing conservation program.

Hearing loss generally occurs over a lengthy period of time. Of course, as one would reasonably expect, acoustic trauma to your hearing can cause instant and permanent damage.

Our monitoring program is designed to identify:

- a. Areas where feasible administrative controls may be implemented to reduce noise exposure. Example: shorter exposure times.
- b. Areas where feasible engineering controls may be implemented to reduce noise exposure. Example: soundproofing.
- c. Which employees should be included in our hearing conservation program.
- d. The types of hearing protection to be used.

Noise monitoring equipment and procedures will be determined by employee mobility, variations in workplace sound levels, individual types of noise such as impact, impulse, or steady stream; and/or the noise type combinations.

Noise Level Monitoring

The monitoring equipment and procedures will be designed to determine the actual sound levels that reach the employee's ears and the length of time there is exposure to those levels.

Noise level monitoring is generally conducted by using a dosimeter, a sound level meter, or both. Because a sound level meter takes one measurement at one point in time, it is useful when sound is fairly constant and the employee is not moving in and out of the noise area.

A dosimeter, on the other hand, stores sound level measurements and can produce an average noise exposure which can be calculated into an 8-hour time weighted average.

When using a dosimeter in an area where employees are exposed to varying sound levels or they move in and out of the noise area, the dosimeter is actually worn and the sound pick-up is placed close to the employee's ear to get an accurate measurement of the sound level exposure. Generally, a dosimeter is the best choice for the workplace.

Noise level monitoring results, as well as 29 CFR 1910.95, will be made available to affected employees and copies of these items be posted in the workplace.

Monitoring Plan

All continuous, intermittent and impulsive sound levels from 80 dB to 130 dB will be integrated into the noise measurements.

All instruments used to measure employee noise exposure will be calibrated to ensure measurement accuracy.

Representative personal sampling will be used, in lieu of area sampling, when there is high employee mobility, significant variations in sound levels, or a significant component of impulse noise.

Area sampling will be used when sound levels are relatively constant and employees have a constant exposure to them.

When there is a change in workplace activity or equipment which would likely increase noise levels, additional monitoring will be undertaken.

- a. All persons found to be exposed to sound levels at or above the action level will be notified.
- b. Affected employees or their representatives will be allowed to observe the noise monitoring process.

Noise Level Monitoring Records

All noise level monitoring records will be kept for a period of two (2) years.

Audiometric Testing Program

Audiometric testing will be made available at no cost to affected employees.

When noise exposures reach the action level, 8-hour time-weighted average of 85 dB, the audiometric testing will be initiated.

Audiometric tests will be performed by a licensed or certified audiologist, otolaryngologist, physician, technician who is certified by the Council of Accreditation in Occupational Hearing Conservation, or who has satisfactorily demonstrated competence in administering audiometric examinations, obtaining valid audiograms, and properly using, maintaining, and checking calibration and proper functioning of the audiometers being used. A technician who operates microprocessor audiometers does not need to be certified. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist, or physician.

Baseline Audiogram

Within 6 months of an employee's first exposure at or above the action level, a valid baseline audiogram will be established against which subsequent audiograms can be compared. Hearing loss can occur as a result of age, trauma, drug reaction, and exposures that are not work related. However, with a baseline audiogram -- which measures the frequency (125 or 250 Hz to 8000 Hz) and loudness (-10 or 0 dB to 110 dB) -- it is possible from subsequent audiograms to determine with accuracy if hearing loss is due to occupational noise exposure or some other cause.

For the purposes of this program, audiograms must measure, in each ear, at least the frequencies of 500, 1000, 2000, 3000, 4000, and 6000 Hz.

Occupational hearing loss occurs within the inner ear in the cochlea. By using a bone-conduction vibrator, sounds can be carried directly to the inner ear and bypass the outside and middle ear areas.

An annual audiogram may be substituted for the baseline audiogram if the audiologist, otolaryngologist or physician who is evaluating the audiogram determines:

- a. The standard threshold shift revealed by the audiogram is persistent.
- b. The hearing threshold shown in the annual audiogram indicates significant improvement over the baseline audiogram.

Procedure

To ensure an accurate test, employees must not be exposed to occupational noises for at least 14 hours prior to the establishment of a baseline audiogram. To meet this requirement, if needed, hearing protectors may be worn during the preceding work shifts. This procedure is to factor out temporary hearing changes from the test.

Annual Audiogram

At least annually, after obtaining the baseline audiogram, a new audiogram will be obtained for each employee exposed at or above an 8-hour time-weighted average of 85 decibels. Each employee's annual audiogram will be compared to that employee's baseline audiogram to determine if the audiogram is valid and if a standard threshold shift has occurred. If a standard threshold shift has occurred, the employee will be notified in writing within 21 days of this determination.

A standard threshold shift would be a change in hearing of an average of 10 dB or more at 2000, 3000, and 4000 Hz in either ear.

While audiograms may be compared by a technician, problem audiograms will be referred to an audiologist, otolaryngologist, or physician for further evaluation.

The person performing this evaluation will be provided the following:

- a. A copy of this program including all standards.
- b. The baseline audiogram and most recent audiogram of the employee to be evaluated.
- c. Measurements of background sound pressure levels in the audiometric test room as required in Appendix D to 29 CFR 1910.95.
- d. Records of audiometer calibrations.

Note: If the annual audiogram shows that an employee has suffered a standard threshold shift, the employee will be re-tested within 30 days and these results will be considered the annual audiogram.

If the physician determines that a standard threshold shift has occurred, the following steps will take place:

- a. Those employees not using hearing protectors will wear them and be trained in their use and care.
- b. Those employees using hearing protectors will be re-evaluated and refitted and provided with hearing protectors that offer greater attenuation. They will also be retrained using this program with emphasis on the need for hearing protection.
- c. The employee will be referred for a clinical audiological evaluation or an ontological examination if additional testing is necessary or if it is suspected that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
- d. The employee will be informed, if necessary, of the need for an ontological examination if a medical pathology of the ear that is unrelated to the use of hearing protectors is suspected.

Audiometric Tests - Recordkeeping

Audiometric test records will be retained for the duration of the affected employees' employment.

These records will include:

- a. The employee's name and job classification.
- b. The date of the audiogram.
- c. The examiner's name.
- d. The date of the last acoustic or exhaustive calibration of the audiometer.
- e. The employee's most recent noise exposure assessment.
- f. Accurate records of the measurements of the background sound pressure levels in audiometric test rooms.

Upon request, employees may have access to these records.

Hearing Protectors

At no cost, and replaced as necessary, hearing protectors will be provided to all employees exposed to an 8-hour time-weighted average of 85 dB or greater.

Ear protective devices inserted in the ear will be fitted or determined individually by competent persons.

Appropriate hearing protectors will be available in a variety of styles from which to choose to provide a comfortable fit and employees will be made aware of the proper use and care of the protectors selected.

In selecting appropriate hearing protectors, Jake Pritchard the below factors:

- a. The hearing protector's noise reduction rating (Subject Fit) [NRR(SF)].

Note: The NRR(SF), measured in dB and found as a number on the hearing protector, can be used by subtracting that number from an A-weighted sound level or a time-weighted average noise exposure to determine the level of protection for most (84%) of the users.

Note: The NRR(SF) is based on tests of continuous noise and may not be an appropriate indicator for protection against impulse or impact noise.

- b. The user's daily equivalent noise exposure.
- c. Variations in noise levels.
- d. User preference.
- e. Communication needs.
- f. Hearing ability.
- g. Compatibility with other safety equipment.
- h. User's physical limitations.
- i. Climate and other working conditions.
- j. Replacement, care, and use requirements.

Training

Affected employees (those exposed to action level noise) will receive training in our Hearing Conservation Program and this training will be repeated annually. Training will be updated to be consistent with changes in the PPE and work processes. An employee who is required to wear hearing protectors and fails to do so will be retrained with emphasis on the needless and permanent damage to hearing caused by careless exposure to hazardous noises in the work environment.

Interactive training will include, but not be limited to:

- a. The effects of noise on hearing.
- b. The purpose of hearing protectors, the advantages, disadvantages, and attenuation of various types, and instructions on selection, fitting, use, and care.
- c. The purpose of audiometric testing and an explanation of the test procedures.
- d. A review of the program including all appropriate standards.

Process of Hearing

Hearing involves, in its simplest terms, conducting sounds from outside your body to your brain. The ear is divided into three main sections:

- a. External Ear collects sounds and directs them to the tympanic membrane (ear drum).

Major Components:

- Pinna: the visible part of the ear.
External auditory canal: approximately 1¼ inch tube to direct sound to the eardrum.
Tympanic membrane: vibrates as it is hit with incoming sounds.

- b. Middle Ear air filled space that connects outer ear to inner ear.

Major Components:

- Ossicles: three bones commonly called the “hammer”, the “anvil”, and the “stirrup”. These bones collect the sound, amplify it, and transfer it to the fluid in the inner ear.
Eustachian tube: small tube connected to the throat that brings air into the middle ear allowing pressure equalization of both sides of the ear drum.

- c. Inner Ear transfers sound vibrations to nerve impulses and sends them to the brain.

Major Components:

- Vestibule: helps maintain balance.
Cochlea: takes vibrations of the middle ear bones and transfers them into nerve impulses that go the brain. The stirrup, in the middle ear, vibrates through a small opening in the cochlea. This opening is connected to fluid filled canals. The pressure waves in the fluid cause small hair type cells to bend. As they bend, they release a nerve impulse which is sent to the brain. The brain perceives these impulses as sound. This is where noise induced hearing loss occurs.
Semicircular canals: involved with equilibrium (balance)
Acoustic nerve:
a. cochlear nerve: connects the cochlea to the brain.
b. vestibular nerve: connects the semicircular canals to the brain.

Noise Induced Hearing Loss (NIHL)

Moderate exposure to loud noise (over 90 dB for one or more hours) may cause reversible changes within the inner ear such as: subtle intracellular changes in the hair cells or swelling of the auditory nerve endings. These temporary changes present themselves as temporary threshold shifts (TTS) 10 dB or more at various frequencies in either ear. This temporary hearing loss will go away within hours -- 16 hours maximum.

How this loss may occur is as follows: continued sound may decrease the stiffness in the hair bundles at the top of the hair cells in the inner ear. This in turn would cause less vibration at a given sound level and an accompanying loss in hearing.

However, continued exposure to loud noise over time will result in permanent threshold shift (PTS) and the resultant permanent, non-reversible hearing loss.

Additionally, the most common cause of tinnitus (an annoying ringing in the ears) is damage to the ear from noise exposure resulting in hearing loss.

Because the loss of hearing is so gradual, so painless, so unnoticeable, there may be a tendency to not take hearing conservation seriously until it is too late and you have lost one of your major contacts with the world around you – your hearing.

Why bother with a Hearing Conservation Program? Why not, instead, just require hearing protectors at all times, in all situations?"

This misses the point. Your hearing – just as your sight, touch, and smell – is your means of contact and placement in the world around you. By wearing hearing protectors when not needed, you lessen your ability to hear and be in touch with your environment.

You certainly wouldn't want to save your hearing and lose your life because you didn't hear the warning "Watch out!", "Stop!" or you missed the sound of approaching danger.

Hearing Conservation Program Recordkeeping

The below records will be retained.

- a. All noise level monitoring records.
- b. All employee exposure measurements.
- c. All employee audiometric test records which will include:
 1. The employee's name and job classification.
 2. The date of the audiogram.
 3. The examiner's name.
 4. The date of the last acoustic or exhaustive calibration of the audiometer.
 5. The employee's most recent noise exposure assessment.
 6. Accurate records of the measurements of the background sound pressure levels in audiometric test rooms.

Record Retention:

The below records will be retained at least for the period indicated:

Noise exposure measurement records will be retained for two years.

Audiometric test records will be retained for the duration of the affected employee's employment.

Access to Records:

All the above records will be provided upon request to employees, former employees, representatives designated by the individual employee, and the Assistant Secretary.

Transfer of Records:

If DFW Moving Company ceases to do business, we will transfer to the successor employer all above records and the successor employer will retain them for the remainder of the period noted above.

Prevention of Heat and Cold Stress

Prevention of Cold Stress

Cold related work illness is a real threat to our employees who work outside during months of cold weather. In order to lessen this threat, this program has been prepared. All current employees will be given instruction in this program prior to working outside where the possibility of frostbite and hypothermia exist.

On days when applicable environmental conditions exist (temperatures or wind chill factors equal to or less than 30 degrees F), the site supervisor will, before the morning shift starts, remind workers of the danger of frostbite and hypothermia, the procedures to lessen its impact, and, in the worst case, the procedure for medical response.

All persons should recognize the symptoms of cold related illness.

Frostbite

(Sensations of coldness; tingling, stinging or aching feeling of the exposed area followed by numbness of ears, fingers, toes, cheeks, and noses. Frostbitten areas appear white and cold to the touch)

Seek medical assistance immediately.

Frostbitten parts should be covered with dry, sterile gauze or soft, clean cloth bandages.

DO NOT massage frostbitten tissue

Take measures to prevent further cold injury.

General Hypothermia

(Shivering, an inability to do complex motor functions, lethargy, and mild confusion)

Conserving remaining body heat. Providing additional heat sources. Seek medical assistance for persons.

Severe Hypothermia

(Unresponsive and not shivering)

Seek medical attention immediately. Reduce heat loss by:

- a. Obtaining shelter.
- b. Removal of wet clothing.
- c. Adding layers of dry clothing, blankets, or using a pre-warmed sleeping bag.

The four environmental conditions that cause cold-related stress are low temperatures, high/cool winds, dampness and cold water. Wind chill, a combination of temperature and velocity, is a crucial factor to evaluate when working outside. For example, when the actual air temperature of the wind is 40°F (4°C) and its velocity is 35 mph, the exposed skin receives conditions equivalent to the still-air temperature being 11°F. A dangerous situation of rapid heat loss may arise for any individual exposed to high winds and cold temperatures.

The purpose of this program is to take definitive measures prior to the onset of cold related illnesses so that medical response will not be necessary. If the above conditions do present themselves, the supervisor, who will always have access to a mobile phone, will follow our standard emergency procedures.

Definitive measures to prevent cold related illness include:

Personal Protective Clothing

Personal Protective Clothing is the most important step in fighting the elements is providing adequate layers of insulation from them. Wear at least three layers of clothing:

- a. An outer layer to break the wind and allow some ventilation (like Gore-Tex® or nylon);
- b. A middle layer of wool or synthetic fabric (Quallofil or Pile) to absorb sweat and retain insulation in a damp environment. Down is a useful lightweight insulator; however, it is ineffective once it becomes wet.
- c. An inner layer of cotton or synthetic weave to allow ventilation.

Pay special attention to protecting feet, hands, face, and head. Up to 40% of body heat can be lost when the head is exposed. Footgear should be insulated to protect against cold and dampness. Keep a change of clothing available in case work garments become wet.

Engineering Controls

Engineering Controls help reduce the risk of cold-related injuries.

- a. Use an on-site source of heat, such as air jets, radiant heaters, or contact warm plates.

Note: During telecommunication operations, flame-type heaters may not be used within ground tents or on platforms within aerial tents unless the tent covers are constructed of fire-resistant materials and adequate ventilation is provided to maintain safe oxygen levels and avoid harmful buildup of combustion products and combustible gases.

- b. Shield work areas from drafty or windy conditions.
- c. Provide a heated shelter for employees who experience prolonged exposure to equivalent wind-chill temperatures of 20°F or less.
- d. Use thermal insulating material on equipment handles when temperatures drop below 30°F.

Safe Work Practices

Safe Work Practices, such as changes in work schedules and practices, are necessary to combat the effects of exceedingly cold weather. Possible workable safe practices include:

- a. Allowing a period of adjustment to the cold before embarking on a full work schedule.
- b. Permitting employees to set their own pace and take extra work breaks when needed.
- c. Reducing, as much as possible, the number of activities performed outdoors. When employees must brave the cold, selecting the warmest hours of the day and minimize activities that reduce circulation.
- d. Ensuring that employees remain hydrated.
- e. Establishing a buddy system for working outdoors.
- f. Educating employees to the symptoms of cold-related stresses – heavy shivering, uncomfortable coldness, severe fatigue, drowsiness, or euphoria.

Provision of Water

Employees will have access to adequate quantities of potable drinking water.

Where the supply of water is not plumbed or otherwise continuously supplied, water will be provided in sufficient quantity.

Supervisor will provide frequent reminders to employees to drink frequently, and, if needed, more water breaks will be provided.

Drinking water will be dispensed in containers with a tight sealing lid and labeled as Drinking Water. Drinking water containers are to be cleaned daily. Water containers will be placed as close as possible to the workers.

Supervisors will monitor water consumption and water supply and ensure adequate levels are available to last the whole shift.

Disposable/single use drinking cups will be provided to employees.

Supervisors will remind employees that personal military style canteens may be worn containing water. In cold weather conditions, employees are encouraged to drink warm, sweet beverages (sugar water, sports-type drinks). They should avoid drinks with caffeine (coffee, tea, or hot chocolate). Employees are cautioned, however, that sharing water from a personal canteen is forbidden and, because of the health hazard to the user and the person with whom it is shared, disciplinary action will be taken against both employees if they drink out of the same container. This disciplinary action will be documented using our disciplinary enforcement form.

Training

All employees will read this program and be given interactive training in its provisions. A copy of this program will be kept at the work area during applicable periods of cold weather.

All supervisors will read the below informational items prior to utilization of this program and have an opportunity for discussion and clarification with Oleksii Dudar, our Safety Director.

[OSHA Cold Stress QuickCard 3156](#)

[OSHA Cold Stress QuickCard 3158 \(Spanish\)](#)

Prevention of Heat Stress

Heat related work illness is a real threat to our employees who work outside during months of high heat and humidity. In order to lessen this threat, this program has been prepared.

All current employees will be given instruction on this program prior to working in heat illness inducing environments or other severe environmental conditions.

On days when applicable environmental conditions exist - periods of hot weather (equal to or greater than 85°F and 40% Relative Humidity) -the site supervisor will, before the morning shift starts, remind workers of the danger of heat illness, the procedures to lessen its impact, and, in the worst case, the procedure for medical response.

All persons should recognize the symptoms of heat related illness.

Heat Exhaustion

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

Remove from hot area.

Have victim lie 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.

The purpose of this program is to take definitive measures prior to the onset of heat exhaustion and heat stroke so that medical response will not be necessary. If the above conditions do present themselves, the supervisor, who will always have access to a mobile phone, will follow our standard emergency procedures.

Definitive measures to prevent heat related illness include:

- a. Provision of water
- b. Provision of shade
- c. Provision of rest (recovery period)
- d. Modified work procedures

Provision of Water

Water is a key preventive measure to minimize the risk of heat related illnesses.

Employees will have access to adequate quantities of potable drinking water.

Where the supply of water is not plumbed or otherwise continuously supplied, water will be provided in sufficient quantity at the beginning of the work shift to provide one quart per employee per hour for drinking for the entire shift.

Supervisors will encourage the frequent drinking of water. The supervisor or a designated person will monitor water consumption every 30 minutes. Employees are encouraged to report bad tasting water or low levels of water immediately so the situation can be corrected.

Supervisor will provide frequent reminders to employees to drink water, and, if needed, more water breaks will be provided.

Every morning during conditions where this program is applicable, there will be short tailgate meetings to remind workers about the importance of frequent consumption of water throughout the shift.

Drinking water will be dispensed in containers with a tight sealing lid and labeled as Drinking Water. Drinking water containers are to be cleaned daily. Water containers will be placed as close as possible to the workers.

Supervisors will monitor water consumption and water supply and ensure adequate levels are available to last the whole shift. Disposable/single use drinking cups will be provided to employees. During extreme conditions, the supervisor will blow an air horn to remind workers to take a water break.

Supervisors will remind employees that personal military style canteens may be worn containing water. Employees are cautioned, however, that sharing water from a personal canteen is forbidden and, because of the health hazard to the user and the person with whom it is shared, disciplinary action will be taken against both employees if they drink out of the same container. This disciplinary action will be documented using our disciplinary enforcement form.

As a reminder of the importance of water to the human system, the following information is supplied:

Fluids

If you heard in advance that this safety meeting was on fluids, you may well have thought that the meeting would focus on the storage, use, clean-up, and possible emergency procedures involved with the liquid chemical products used on or near work areas. You'd be wrong. While the above are important topics and questions related to them should be addressed to the competent person, this safety meeting is about **your** bodily fluids.

From a safety standpoint, you must not neglect your need for potable (drinkable) fluids. Water is not only the most abundant of all compounds found on the earth, it is the most abundant part of you – actually about 65% of you is water.

Drink fluids! From a life process standpoint, what fluid intake is doing is keeping you healthy by allowing your body to maintain its core body temperature at its appropriate level. When your brain senses that cooling action is needed, your body circulates blood to your skin to allow it to cool with the outside temperature. If the water used for sweat is not replaced, a water deficit starts to occur. The millions of chemical reactions taking place in your body at every moment can only occur in the presence of water. The fluids in your body transport nourishment, gases, and waste.

Imagine your body as a water based chemical factory that functions only within a narrow temperature range. An average, healthy person, at rest, has an oral temperature of between 98.6°F and 100.4°F. If your body temperature reaches 105.8°F, convulsions may occur. Your whole central nervous system is impaired when your body temperature raises 9°F above normal. At 106.0°F, the thermoregulatory center in your brain fails and, because of damage to your central nervous system, the sweating (cooling) mechanism cuts off when you need it most. It is a vicious circle – the hotter you get, the more heat you generate through metabolism. In fact, at 107.6°F, cellular metabolism is 50% higher than at normal temperatures.

Without getting too graphic, here are some of the problems associated with extreme water loss: cells will shrink; the skin will lose its elasticity; skin and mucous membrane cells will dry out eyeballs will become soft; weight loss will occur; the body temperature will rise; apprehension, restlessness, and even coma may occur; urine will become concentrated; renal shutdown will occur; red blood cells will shrink; death.

Stay healthy! Drink water! Water is truly the stuff of life.

Provision of Shade

The supervisor will ensure that employees have access to shade to minimize the risk of heat related illnesses. If natural shade is not available, the supervisor will ensure that sun umbrellas or portable canopies are provided in adequate number. These umbrellas or canopies will be placed in close proximity to the work activity (i.e., no more than 50-100 yards).

Ideally, if available, employees will be allowed to get out of the sun by entering an air conditioned structure such as a building or job trailer. This not only provides shade, it provides a cool, less humid, atmosphere. Any employee who feels the need for shade will protect himself/herself from the sun for a period of not less than 5 minutes.

Lastly, but importantly, persons must provide personal shade in the form of shirts (preferably light colored to reflect the sun). Shirts are required to prevent sunburn, another health hazard.

Provision of Rest (Recovery Period)

While shade and rest often go hand in hand, they are two distinct activities. Any employee who, due to heat, humidity, or exertion under the provisions of this program, may rest for a period of not less than 5 minutes if that employee believes a preventative recovery period is required.

Modified Work Procedures

The supervisor will make every effort, consistent with our effort to properly perform our job tasks, to modify work procedures. Example would include performing work requiring heavy exertion during the cooler hours of the day, assigning more persons to a job task to lessen the effort required of each, and the use of machinery in lieu of physical effort.

All employees, but new employees in particular, should be allowed to acclimate to hotter weather. It takes a body four to fourteen days to acclimate to hotter weather. Reduced workloads and careful attention to new employees may be required.

Training

All employees will read this program and be given interactive training in its provisions. A copy of this program will be kept at the work area during applicable periods of heat and humidity.

All supervisors may wish to read the below informational items prior to utilization of this program and have an opportunity for discussion and clarification with Oleksii Dudar, our Safety Director.

[American Red Cross Heat Wave Safety](#)

[CAL OSHA Heat Illness Prevention etool](#)

DFW Moving Company Safety Program Addendum

DFW Moving Company
Company Specific Safety Requirements

There also may be times when DFW Moving Company requires its employees to meet safety policies that are specific to our company. If we implement these additional policies, they must have more stringent safety requirements than what OSHA has developed.

We currently do not have any company specific safety requirements.