

General Safety Awareness Program	Number:
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I. PURPOSE STATEMENT:

This document provides a written general safety program for the company. This program is designed to establish clear company goals and objectives and will be communicated to all employees.

II. SCOPE:

This document applies to all employees and working owners of the company.

III. REFERENCES

A. REGULATORY STANDARD

1. *OSHA General Duty Clause*

B. Company Policies & Procedures

- C. 01-SEM-001 – Safety & Environmental Manual Policy

IV. RESPONSIBILITIES

3.1 Area Management will:

- 3.1.1 Identify and evaluate any safety hazards.
- 3.1.2 Prioritize and address safety hazards based on risk level.
- 3.1.3 Provide reasonable solutions to reduce or eliminate recognized safety hazards.
- 3.1.4 Enforce federal, state and company safety rules and regulations in the workplace.

3.2 Employees will:

- 3.2.1 Report safety concerns and hazards to your Supervisor.
- 3.2.2 Participate in the resolution of the recognized safety hazards, as needed or required.
- 3.2.3 Conduct their work activities in a safe manner.
- 3.2.4 Abide by all the safety rules and regulation established by the company.
- 3.2.5 Assist in maintaining their work area in a clean and neat condition.

3.3 Safety Representative must (as needed):

- 3.3.1 Provide assistance to management in the resolution of recognized safety hazards.

V. DEFINITIONS

- A. *SDS* - Safety Data Sheets.
- B. *CTD* - Cumulative Trauma Disorder is a medical condition caused by repetitive forces or motion.
- C. *CTS* - Carpal Tunnel Syndrome is a medical disease that affects the nerves in the wrist.
- D. *VDT* - Visual Display Terminals like computer monitoring equipment.

VI. SAFETY INFORMATION

5.1 Ventilation

- 5.1.1 General building ventilation systems are usually adequate to remove particulate matter and circulate fresh air throughout the building. Ventilation concerns are generally caused by:

- 5.1.1.3 faulty filters in fresh air ducts

- 5.1.1.4 corridors leading from outside areas (where dust and particulate matter can be drawn into the building)

- 5.1.1.5 enclosed rooms where several printers or copiers are located in a small space (due to paper dust and/or toner dust being generated).

- 5.2 Lighting. The role of proper lighting is to provide a safe, comfortable and efficient visual environment. The following safe lighting criteria will be used to evaluate lighting conditions in office areas.

- 5.2.1 Bare light sources will not be placed in the visual working field of any employee. Light sources will be properly shielded in these instances.

- 5.2.2 The luminance and reflectance of surfaces of furnishings, shades, louvers, acoustic screens, will be considered to reduce their reflectance.

- 5.2.3 Windows will be covered where appropriate.

- 5.2.4 Wall surface colors and degree of reflectance will be appropriate to the work area.

- 5.2.5 Furniture should be arranged so that the luminaire is beside rather than in front of the operator. Light will then be directed across the work surface rather than into the worker's eyes.

- 5.3 Eye Strain. Adjusting the screen for the minimum amount of glare and best contrast will reduce the amount of eyestrain our employees' experience.

- 5.3.1 Monitor/VDT problems. Correct placement of the VDT can relieve stress on the neck and shoulders. Adjust the monitor so screens can be read with the head up and facing forward (at about eye level). Employees with bifocals should be able to read without tilting their head. Distance is key in that employees should not have to move to focus.
- 5.3.2 Glare and contrast. The two major sources of eye strain from working with a VDT are glare and poor contrast. Most offices have diffused overhead lighting to reduce screen glare, but glare from windows or other light sources, like lamps, should be shielded. Blinds can be closed to reduce light glare. Desks and work areas can be repositioned to reduce glare, or the brightness and contrast controls on a VDT can be adjusted.
- 5.3.3 Minimizing Eye Strain. Reading from a VDT for hours at a time can be very hard on the eyes. The characters on a VDT screen are not as sharp as print on paper-- they are almost always a little bit fuzzy. They are also always moving, and even though they may not move enough to notice, they move enough to make focusing difficult. Employees should be encouraged to take micro breaks or switch to other non-computer based tasks to reduce eye strain.
- 5.3.4 Supervisor involvement. Encourage employees to have their eyes examined annually--more often if they are having vision problems or if their eyes feel tired at the end of the day. Even when VDT work does not cause a vision problem, the strain of reading from a monitor for long periods will make it difficult for employees to continue ignoring uncorrected or under corrected vision problems they might already have.
- 5.4 Ergonomic Improvements. Ergonomic improvements can dramatically improve worker safety and productivity. Employees are most likely to work efficiently and accurately when they do not have to strain. Supervisors should be given adequate training in recognition and control of ergonomic improvements.
 - 5.4.1 Problem recognition. Supervisors should know the symptoms of Cumulative Trauma Disorders (CTD) and recognize when the stress involved in a particular job has the potential for contributing to a CTD. Make sure employees are working in the best way possible.
 - 5.4.2 Cumulative trauma disorders. The most common CTDs are Tendinitis (inflammation of a tendon, usually at the wrist or elbow), Carpal Tunnel Syndrome (CTS) (caused by pressure on the nerve in the wrist) symptoms include numbness, difficulty holding objects and restricted movement), and lower back problems (strains caused improper lifting, or improper seating or poor work station design).
 - 5.4.3 Data entry. Data entry is probably the biggest contributor to CTS. With the fingers resting on the home keys of the keyboard, and shoulders relaxed, the employee's wrists and forearms should be in a straight line and more or less parallel to the floor. Surface or chair height adjustments may help (so employees type or write with body erect with feet flat on the floor.
 - 5.4.3.1 The edge of the seat should not contact the back of the knees. Arm rests and keyboard wrist rests can be provided to relieve the pressure on the

upper body. Footrests can assist in relieving strain on the back. Keyboard placement or copy stands, and telephone headsets may improve working postures. Back supports or lumbar supports on chairs can help prevent strain. Repetitive force and lifting can be minimized to prevent injury, or frequent breaks can be offered. Employees should be encouraged to take “stretch breaks” even if only for a minute or two.

5.4.4 Supervisor involvement. Make changes slowly, one at a time, and follow up on the effects. Observation and open communication with employees are our two most valuable tools for reducing the risks of ergonomic disorders in the workplace. If an employee has symptoms of a CTD, encourage him or her to get medical attention and work with the employee to find out if changes should be made in the job design.

5.5 Disciplinary Actions for Willful Unsafe Acts. Employees who willfully endanger themselves or the safety of their co-workers will be subject to the disciplinary action procedures stipulated by company policy or the Employee Handbook.

I. TRAINING AND INFORMATION

6.1 Employee Orientation and General Safety Training:

6.1.1 All new employees will be provided with a general safety orientation upon initial assignment. This orientation will include:

6.1.1.1 A review of the employee responsibilities with regard to workplace safety and an overview of the general safety workplace rules.

6.1.1.2 The hazards that may be encountered in the workplace.

6.1.1.3 The process for reporting hazards, accidents, injuries and near-misses.

6.1.1.4 It is additionally recommended that the orientation include information on office safety and ergonomics.

6.1.2 Employees who transfer or change jobs within the company will be provided with work area specific training in the hazards they may encounter.

VII. PROCEDURE

4.1 General Work Rules:

4.1.1 General Duty Clause

4.1.1.1 OSHA’s general duty clause states that companies must provide a place of employment that is free from recognized hazards.

4.1.1.2 Each employee is responsible to comply with the standards and regulations that are applicable to their work activities.

4.1.2 Housekeeping

4.1.2.1 Every safety management program includes standards for general housekeeping. Housekeeping ensures that materials and contaminants do not accumulate and cause hazards to employee safety and health.

4.1.2.2 Workplaces will be cleaned on a regular basis.

4.1.2.3 Restrooms will be kept in a sanitary condition.

4.1.2.4 Materials will be stored in designated areas and not allowed to accumulate in places where employee safety could be at risk (i.e. aisles, corridors, stairwells, near exits, around machinery or equipment where employees work, etc.).

4.1.2.5 Tools and equipment will be stored in their appropriate places.

4.1.2.6 Chemicals will be handled according to their instructions. Spills or leaks will be cleaned up immediately and prevented from reoccurring.

4.1.2.7 Protective equipment will be used, as needed or required.

4.2 Written Standard Operating Procedures:

4.2.1 Job Hazard Analysis (Identifying Hazards) - Each job task will be reviewed for safety hazards. Recognized safety hazards will be prioritized and addressed based on their risk level.

4.2.2 Written Procedures

4.2.2.1 Develop written procedures outlining the steps to take to reduce or eliminate recognized safety hazards. These procedures must identify when the use of personal protective equipment (PPE) is necessary.

4.2.2.2 All companies must have:

4.2.2.2.1 Emergency Evacuation and Fire Prevention Programs (written if >10 employees).

4.2.2.2.2 Hazard Communication Program in workplaces where chemicals are used or stored.

4.2.2.3 Written procedures are required if there are exposures to:

4.2.2.3.1 Blood or bloodborne pathogens

4.2.2.3.2 Hazardous chemical exposures

4.2.2.3.3 Confined spaces

4.2.2.3.4 Control of hazardous energy (Lock-out/Tag-Out)

4.2.2.3.5 Live electrical energy (>50 volts)

- 4.2.2.3.6 Noise levels >85 dBa
- 4.2.2.3.7 Laboratories
- 4.2.2.3.8 Forklifts
- 4.2.2.3.9 PPE required activities
- 4.2.2.3.10 Physical hazards
- 4.2.2.3.11 Radiation
- 4.2.2.3.12 Respiratory hazards
- 4.2.2.3.13 Shipping and handling of hazardous materials
- 4.2.2.3.14 Lasers (>Class 2)

4.3 Recordkeeping (Incident Investigation and Reporting):

- 4.3.1 Incidents are work-related activities that cause concern for the health or safety of employees. All injuries (and work-related illnesses) are considered incidents.
- 4.3.2 Reporting of incidents is required for many companies. Specific information about incidents must be identified and recorded on specific OSHA forms.
- 4.3.3 Investigation may be required to determine some information that is required to be reported.
- 4.3.4 Exemptions from Recordkeeping exist for some industries in general and for employers with fewer than 10 employees. For a full listing of exempted industries, see the OSHA website at www.OSHA.gov, or reference the listing in the OSHA Recordkeeping Exemption Listing form associated with this program.

4.4 Emergency Evacuation Planning:

- 4.4.1 All companies must have a program for emergency evacuation of their employees.
- 4.4.2 Companies with more than 10 employees must have this information in writing.
- 4.4.3 Companies should post their evacuation routes to assist employees and others during an evacuation situation.
- 4.4.4 A review of the emergency action program must occur for every employee when the program is developed, upon initial assignment or new hire, when the employee's responsibilities under the program change and whenever the program is changed.

4.4.5 Any employees that have specific duties and requirements under the program (i.e. assisting others, locking sensitive information, area searchers or wardens, etc.) must be specifically trained in their duties and responsibilities.

4.5 Hazard Communication:

4.5.1 Every employee exposed or potentially exposed to hazardous chemicals in the workplace must be trained and informed of the hazards of those chemicals and the measures to be used to protect themselves from exposure. This training must occur initially and whenever changes to hazards in the workplace occur.

4.5.2 Safety Data Sheets are required for all hazardous chemicals or mixtures used or stored in the workplace.

4.5.3 A hazardous chemical inventory list must be maintained at the workplace (either one master listing or individual area listings) that list the hazardous materials by name (as it appears on the SDS) the manufacturer's name and phone number and any "common names" that the company may call the product (if they are different than the SDS name).

4.5.4 A written program must be present in the workplace describing how the requirements of the regulation are implemented.

4.5.5 All hazardous chemicals must have labels indicating the product identifier, supplier contact information, hazard pictograms, signal word, hazard statements and precautionary statements.

4.6 Electrical Safety

4.6.1 Any exposure greater than 50 volts requires electrical safety training and information be provided to employees. Employees with such exposure require the knowledge to understand the magnitude of the hazard they are exposed to and the measures needed to prevent injury from such exposure.

4.6.2 All electrical installations and equipment must meet the installation and maintenance requirements under the National Electrical Code.

4.6.2.3 Companies must ensure that electrical service panel boxes and equipment shutoffs are clear and unobstructed at all times for use during an emergency.

4.6.2.4 Electrical service panel boxes must have covers and those covers must remain in the closed position when the panel is not being accessed.

4.6.2.5 Electrical sources and outlets within 3 feet of any water source (such as a sink or drinking fountain) must be GFCI (Ground Fault Circuit Interrupt) protected.

4.7 Audits and Inspections:

- 4.7.1 Safety audits are formal reviews of employee activities, workplace processes and systems, and documentation. Audits normally use pre-established or written protocols or inspection reports to assure that the written procedures and process flows indicate what the employees are supposed to do, and that employees are following the procedures as written. Audits will normally have a final written summary report of the non-conformances that is presented to management. Each finding or non-conformance will have corrective actions assigned by management to correct the deficiency in the system.
- 4.7.2 Inspections are informal reviews of employee activities, workplace processes, systems and documentation. Inspections may use pre-established written checklists, or may be even less-formal. The checklists are normally in a yes/no format that indicates whether or not the activity or process is compliant with what is required. Inspection findings are generally discussed with area supervisors or management, and the retention of the checklist (to assure that the items have been corrected before the next inspection) is normally the only documentation maintained.
- 4.7.3 Some regulations require that procedures or activities be inspected, and that the inspection documentation be retained for a specified period of time. However, inspection reports are generally kept only until all action items are addressed or they are superseded by subsequent inspection reports.
- 4.8 Communications:
- 4.8.1 Employees are encouraged to voice concerns and suggestions to their supervisors or to the Safety Officer. These communications can be verbal or written.
- 4.8.2 Management will provide employee training as the need arises or regulations require.
- 4.9 Safety Committee:
- 4.9.1 Some states require safety committees if companies have more than 20 employees. It is generally recommended that any company with more than 20 employees establish a safety committee.
- 4.9.2 Committees should meet at least quarterly and be comprised of at least 3 employees. A member of management and/or the safety officer may serve as additional members of the committee. The committee chairperson should not be a member of management or the company Safety Officer.
- 4.9.3 Safety committees should discuss safety concerns at the company. They may be charged with performing area inspections, injury report reviews and investigations, training, or other safety-related duties that are appropriate to the business needs of the company.
- 4.10 Records Retention:
- 4.10.1 Training Records are maintained until they are superseded by new training.

- 4.10.2 Audit Reports are kept for 5 years or until all findings are corrected, whichever is longer.
- 4.10.3 Inspection Reports are kept until all findings are corrected, the reports are superseded by new reports, or for a duration specified by a specific regulation, whichever is longer.
- 4.10.4 OSHA 300 logs and associated Injury and Illness Records are kept for 5 years.
- 4.10.5 Certain hazardous chemical exposure records (e.g. cancer causing agents, benzene, asbestos, and mercury) and biological exposure records (e.g. needle stick injuries of contaminated blood or body fluids) are kept for the duration of employment plus 30 years.
- 4.10.6 Other safety records are generally kept only until the actions that are required to be taken are complete.

II. REVISION LOG

Rev No.	Date	Revision Made	Reason
00		Original	
01			
02			
03			
04			
05			

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