



J.J. DeLONG & ASSOCIATES, INC. SAFETY AND HEALTH POLICY

J.J. DeLong & Associates, Inc. is committed to safety and every employee should understand the importance of safety in the workplace. By remaining safety conscious, employees can protect their own interests as well as those of their co-workers. J.J. DeLong & Associates, Inc. believes in the philosophy “safety first” and expects all employees to take steps to promote safety in the workplace.

MANAGEMENT RESPONSIBILITIES

Management and those with supervisory responsibilities will be held accountable for overseeing the safety and health of the personnel for whom they are responsible. In the event that an employee notifies J.J. DeLong & Associates of an unsafe condition or practice at the company where the employee is working, it is management’s responsibility for communicating safety to employees about the safety requirements of the jobs they will be assigned.

SAFETY COORDINATOR RESPONSIBILITIES

J.J. DeLong & Associates, Inc.’s Safety Coordinator is responsible for providing guidance on safety to management and employees. The Safety Coordinator should help management and employees identify accident prevention and safety training needs, assist supervision with implementing safety strategies, identify and communicate safety and health requirements, compile accident/illness related records, track progress on safety projects and work with employees to optimize safe work practices.

EMPLOYEE RESPONSIBILITIES

All employees are expected to follow safe work practices, obey rules and regulations, and to work in a way which maintains the high safety standards developed and sanctioned by J.J. DeLong & Associates, Inc. All employees are expected to take an active interest and participate in the safety and health program. All employees must recognize their responsibility to prevent injuries and illnesses and must work in a way which prevents and/or reduces accidents.

When employees are assigned to work at a company it is their responsibility to become familiar with the policies/procedures of that company. For example, employees should become acquainted with the safety rules for the job to which they will be assigned, the location of the first aid facilities and to whom they should report any unsafe conditions.

ACCIDENT/INJURY REPORTING

Prompt reporting of your accident/injury is extremely important. You must notify J.J. DeLong & Associates, Inc. immediately when an injury or accident occurs. This is to allow J.J. DeLong & Associates, Inc. the opportunity to begin an investigation of the incident. In addition, you are also responsible for reporting your injury on an "Employee's Report of Injury" and forwarding it to J.J. DeLong & Associates, Inc.

PROCIDURES FOR OBTAINING MEDICAL TREATMENT

If you are injured and need medical treatment immediately notify your supervisor. Follow the company's procedures where you are working for obtaining medical treatment.

GENERAL INFORMATION

The following is general information regarding safety policies and recommendations. This safety manual cannot anticipate every safety policy or circumstance involving safety. Specific client safety requirements will be discussed with you prior to starting an assignment. You may also receive an orientation manual for the company where you are assigned. If you have any questions regarding this safety manual, feel free to contact J.J. DeLong & Associates, Inc.

PERSONAL PROTECTIVE EQUIPMENT (PPE) AND CLOTHING

There are situations and conditions whereby personal safety can be enhanced with the use of personal protective equipment (PPE) such as gloves, safety glasses, ear plugs or muffs and respiratory gear. Ideally, before it is determined that PPE is required, other options should be considered such as: Using equipment with noise controls or using materials or processes which do not require respirators. In those cases where it is determined that PPE is required to insure the highest possible degree of personal safety, three things should be considered: (1) what type of PPE should be used; (2) how should it be used; and (3) when should it be used. Contact the safety department for assistance/clarification in this area.

Training is essential to the proper use of PPE. Once it has been determined that PPE is required, the supervisor will establish an effective training program. This training will address:

1. The policy governing the use of the particular PPE for which the training is provided.
2. How the PPE is to be worn.
3. How the PPE should be cleaned and maintained.
4. How the PPE is to be replaced.
5. All training in the use and care of PPE should be documented.
6. Once a PPE program has been implemented in an area, it is the responsibility of the supervisor of that area to insure total compliance.
7. Safety glasses must always be worn in designated areas.

SAFETY GLASSES

OSHA requires safety glasses to be worn by employees subjected to hazardous environmental conditions where machines or operations present the hazard of flying objects, liquids, injurious radiation, or a combination of these hazards. J.J. DeLong & Associates, Inc.'s employees whose vision requires the use of corrective lenses shall wear goggles over corrective spectacles without disturbing the adjustment of the spectacles. Most of our clients will furnish each employee with safety glasses (with side shields and brow protectors). You are required to wear the issued glasses/goggles while in the factory area as part of your employment.

SAFETY SHOES

Open-toed shoes, sandals or canvas style shoes are not permitted to be worn while performing daily work assignments. Steel-toed shoes may be required. You will not be permitted to work on an assignment without proper foot attire.

HEARING PROTECTION

Decibel readings, as recorded on a noise level Dosimeter, indicate that hearing protection is mandatory in certain areas. If you are assigned to these areas, you will be issued hearing protection consisting of disposable sponge units, soft pliable silicon rubber, or ear muffs. You are responsible for cleaning and maintaining your personal hearing protective equipment and for requesting replacements as needed.

RESPIRATORY PROTECTION

Processes or work procedures may result in your over-exposures to toxic chemicals. Respirator use is necessary to help reduce these exposures, only if engineering controls or administrative controls are not technically or economically feasible or for temporary high-exposure situations such as sporadic clean-up operations or emergencies.

ELECTRICAL LOCKOUT AND DANGER PROCEDURES

1. Lockouts are required any time you may be exposed to danger if the equipment you are working on is started by mistake or any time the operation of a particular piece of equipment will cause damage to the equipment.
2. Before starting work on a piece of equipment requiring lockout, you must first obtain permission from the supervisor for the equipment.
3. Equipment requiring lockouts will be locked out locally at the piece of equipment where facilities are required.
4. All start/stop switches which operate this equipment must be tested and tagged (i.e. "Danger – Do Not Start", or "Danger – Do Not Close Switch")
5. If localized lockout facilities are not available, the lockout will be made at the motor control center.
6. Opening the circuit and removing the fuse does not provide adequate protection. There is not guarantee the circuit is dead and no way to prevent someone from replacing the fuse.
7. Safety padlocks and keys (one key for each lock) should be provided for the use of authorized repair personnel such as maintenance, lead set-up and electricians. There is not to be a master key for any lockout locks.
8. You must attach and remove your own lock.
9. Before any work is begun by you requiring lockout, put your own lock on the lockout and place a "Danger" tag on the start switches.

10. Test the lockout method by trying to close the circuit breaker with the lock in place.
11. Test the Circuit to ensure it is de-energized by closing the local switch to see whether the equipment starts, then return the switch to the off position. If this is not possible, use the proper equipment to test the circuit.
12. Insert a flywheel or main Locking device.
13. When you finish your job, remove your own lock and tags.
14. If work extends into the following or subsequent shifts, remove your lock after the person involved on the second shift attaches their locks.
15. When maintenance jobs are incomplete and work is discontinued for the day, overnight lockout equipment must be coordinated with concerned supervisor. Locks may be left in place to protect you and/or the equipment until work is again continued.
16. All maintenance employees are prohibited from loaning out any safety lock keys to anyone else.

ERGONOMICS IN THE WORKPLACE

Some jobs require you to perform the same or similar tasks over and over again. It is important, when performing these repetitive motion tasks, to stand or sit in a correct posture. It is also important to have the work station at the proper height and distance from your body. For example, if you are tall and have a long reach, you may need your work station at a different height and distance from your body than someone who is shorter than you. If you feel that your work station is not the correct height or distance from your body in order for you to work comfortably, then notify your supervisor.

CONFINED SPACE ENTRY

The OSHA confined spaces rule establishes the definition for “permit-required confined spaces”, as a confined space that contains or has potential to contain a hazardous atmosphere, contains a material that the potential for engulfing the entrant, has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section or contains any other recognized serious safety or health hazard.

OSHA also indicates that some confined spaces may be excluded from the definition. Those areas are termed “non-permit confined spaces: which means a confined space which does not contain, or with respect to atmospheric hazards, have the potential to contain any hazard capable of causing death or serious physical harm.

Examples of confined-space could include: tanks, vessels, silos, storage bins, hopper, vaults, vats and pits, etc.

Commonly recognized confined-space hazards include: toxic vapors, gases or liquids, flammable gases; insufficient oxygen; electric shock hazards; flowing solid materials like grain, fly ash, and sand, mechanical equipment that could be activated like agitators, mixers, augers, pumps or valves; and physical hazards, such as slippery surfaces or sharp objects.

BLOODBORNE PATHOGENS

Acquired Immunodeficiency Syndrome (AIDS) and Hepatitis B merit serious concern for workers occupationally exposed to blood, other potentially infectious material, and certain other body fluids, that contain bloodborne pathogens such as the human immunodeficiency virus (HIV), and the Hepatitis B virus (HBV).

You may be exposed to bloodborne pathogens in many ways. Although needle stick injuries are the most common means of exposure for health care workers, bloodborne pathogens also can be transmitted through contact with the mucous membranes and non-intact skin of workers. Universal precautions must be observed. This method of infection control requires you to assume that all human blood and specified human body fluids are infectious for HIV, HBV, and other bloodborne pathogens. Where differentiation of types of body fluids is difficult or impossible, all body fluids are to be considered as potentially infectious.

The bloodborne pathogens standard identifies how to determine who has occupational exposure and how to reduce workplace exposure to bloodborne pathogens. Preventive measures and other requirements of the standard will depend on the assigned client company and the risks involved.

HOUSEKEEPING

Housekeeping standards must be established and maintained at all times rather than depending upon cleaning to eliminate hazards. Machines, tools, work areas and miscellaneous equipment must be inspected on a periodic basis to insure that it is in compliance with standards. Any deficiencies, when observed, must be reported immediately and action taken to correct the defect. In addition, the following guidelines should be observed at all times:

1. You are responsible for the cleanliness and neatness of your work area or machine. Please keep your area free of accumulation of trash, scrap and unnecessary materials.
2. All aisles must be kept clean for passage of employees and forklifts, etc.
3. Use scrap bins and trash bins. Never throw trash or scrap on the floor or ground.
4. Keep tables and work benches clear of excess items.
5. Use ashtrays for disposing of cigarette ashes, matches, etc.
6. When cleaning work tables or machines, use appropriate towels. Never wipe a table or machine with your bare hand.
7. Never wipe face with bare hand or rag. Always use a clean tissue.
8. Walk, never run. Be alert to tripping hazards. Remove hazards that could cause a slip or a fall. Look ahead and pay close attention above as well as around walking areas.
9. Access to emergency equipment such as: fire extinguisher, control valves, fire hoses, electrical control panels must be free at all times from any and all obstructions.
10. If oil or grease is spilled or leaks on the floor, use an oil absorbent to remove slipping hazard immediately.
11. Never leave oily or dirty rags lying around machinery, or anywhere in plant or cafeteria. Place in designated bins.
12. You are prohibited from altering, defacing, or changing the design of company property in any manner without proper authority.
13. Please observe the use of special safety equipment in designated areas such as: face shields, mesh gloves, leather sleeves.

HAZARDOUS MATERIALS TRAINING AND HANDLING

Many manufacturing organizations store and use some materials which may, if not handled properly, cause illness or injury to you. The purpose of this section is to detail the procedures which must be followed to prevent injury to personnel as well as to ensure compliance with OSHA's Hazard Communications Standard. A program for hazardous materials consists of the following three major components:

1. Identification of all potentially hazardous materials.
2. Labeling all hazardous materials.
3. Training all personnel in the safe handling of the hazardous materials to which they are exposed.

IDENTIFYING HAZARDOUS MATERIALS

The Hazardous Communications Standard requires a master list of all chemicals used in the facility. This list is best put together by gathering information from several sources.

- A walk-through survey of the facility to inventory every chemical substance present.
- Cleaning or other supplies used by the company in a consumer manner should be noted along with their limited use.
- Purchasing documents such as invoices and receiving reports.
- Industrial hygiene report giving by-products and intermediate products generated.
- Information on building materials used, transformers and other fixed problem areas.

The Hazardous Communications Standard also requires a material safety data sheet (MSDS) for each chemical used. These should be supplied by the supplier or manufacturer of the chemical/material. If the manufacturer declares the substance is non-hazardous, the document from the manufacturer which states this should be filed for verification.

MATERIAL SAFETY DATA SHEETS (MSDS)

A MSDS is a description on paper of a single substance or a mixture of substances. It must be printed in English. It is essential that workers who do not speak or read English be assisted in their understanding of MSDS's. The MSDS of a single substance is required to give such routine information as:

- Its names – both chemical and common.
- Its chemical and physical characteristics including appearance and odor.
- Physical routes of entry into the body.
- Recommended and required exposure limits.
- Control measures known.
- List of hazardous substances it appears on.
- Measures necessary to protect against it during use and cleanup.
- First aid measures to be used in case of accidental exposure.
- The name, address, and telephone number of the responsible MSDS preparer or distributor and the date when it was prepared.
- New information about hazards or protection within three months of its appearance.

An MSDS of a mixture tested as a whole must also include the chemical and common name(s) of ingredients amounting to 1% or more when it constitutes a health hazard, but just .1% for a carcinogen. A mixture containing 1% or more of a hazardous chemical or 0.1% or more of a carcinogen is considered hazardous. A mixture is also considered hazardous if any component could release a concentration exceeding the OSHA Permissible Exposure Limits or current Threshold Limit Values into the air.

LABELING

In addition to the MSDS identifying hazardous substances, the Hazard Communication Standard requires contents of containers to be identified and printed in English. Again, if you do not read or write English you should receive further instruction. The contents may be identified by labels on the containers or other means such as signs, placards, process sheets and batch tickets, as long as you have ready access to them.

Whatever the printed means used for identifying the substance, the information required on it is:

- The hazardous substance's chemical and common names.
- The type of hazard-physical, health or explosive.
- Target organs
- The manufacturer for responsible party's name and address.

TRAINING

In training, risks and protection from hazardous substances at work will be addressed. Some information can be covered on a general and comprehensive level. You must be made aware of the Hazardous Communication Standard and its provisions. Equally important is your training in the company's hazard Communication Plan.

EQUIPMENT SAFETY

Machinery, Presses, and Guarding

Because of the variation in design, purpose and operation of the various machines and presses in use at our client companies, it is not practical to thoroughly cover all safety factors of each piece of equipment in this section. Rather, we have established some general operating procedures for all pieces of equipment as well as some specific guidelines for certain types of equipment.

The following Guidelines should govern the use and operation of all machinery regardless of type of function:

- No employee should be required/allowed to operate equipment on which they have not been trained to operate safely and properly.
- If you detect a malfunction in a machine or its safety system which you believe may result in injury, immediately shut down the machine and notify your supervisor.
- Once a machine has been shut down because of a safety concern, that machine may not be used (except for inspection or repair) until the supervisor or their authorized designate has reviewed the concern/corrective action and approved the use of that machine.
- Safety devices such as: barrier guards, light curtains, palm buttons, etc. Shall not be removed or modified in such a way that the protection they were intended to provide is eliminated or reduced.

- Before using machinery equipped with electrical, mechanical, etc. Guarding devices, the operator should confirm that these devices are functioning and set properly.
- In determining whether or not a machine or press requires guarding or other means of operator protection, the existence of an opening of one-quarter inch or more, in which a body part could be pinched, shall constitute the need for guarding/protective devices. Contact the safety department for specific data.

*Machinery with rotating heads or tools such as: drill presses, vertical and horizontal mills, lathes, deburring machines, etc. Pose risks which can be minimized by following the specific rules. These are:

- Contain hair by wearing a hat, cap, hood, hair net or other similar apparel when operating drill presses.
- When operating any of the machinery with rotating heads or tools, do not wear long sleeves below the elbow, rings, watches, bracelets, gauntlets, loose-fitting clothing, necklaces or gloves
- When drilling or milling, the part should be contained in a fixture or vise which is either secured or blocked so as to prevent the part and/or fixture from spinning in the event that drill/mill "seizes" the part..
- The drive system of the machinery, whether it be belts, chains, gears, pulleys, etc. must be enclosed to prevent you from becoming caught in the equipment. This encompasses all rotating parts.
- When drilling or milling, the tool should be kept sharp and the operation performed such that long shavings will not occur which could cut or capture you.
- It is important that when drilling or milling, the machinery is operated at the proper RPM's.

REPORTING UNSAFE CONDITIONS AND RISKS

When employees think that an unsafe condition exists or feels that they are being asked to perform an unsafe act, they have been advised to then call J.J. DeLong & Associates, Inc.

Where it is determined that an unsafe or unhealthy condition, work practice or work procedure exists, J.J. DeLong & Associates, Inc. will take steps that it thinks are appropriate under the circumstances.

REPORTING ACCIDENTS / ILLNESSES

Employees are required to immediately report any work related accidents/illnesses to J.J. DeLong & Associates, Inc. Employees are responsible for initiating and cooperating in the completion of all accident reports.

PROCEDURES FOR OBTAINING MEDICAL TREATMENT

Employees are required to familiarize themselves with the procedures for obtaining medical treatment of the company to which they are assigned.

MODIFIED DUTY

J.J. DeLong & Associates, Inc. is committed to locating light duty work for employees who have experienced work related injuries or illnesses. Management will make every attempt to accommodate employees with prescribed medical restrictions.



TO: ALL J.J. DeLONG & ASSOCIATES, INC. EMPLOYEES

FROM: JEFF DeLONG, PRESIDENT

J.J. DeLong & Associates, Inc. is committed to assuring that each of its employees is provided with a safe place to work.

While on assignment, you are expected to become acquainted with the safety rules for your job including the use of guards on machines, operation of equipment, first aid facilities, and to whom you should report any unsafe conditions.

You should remain alert to the dangers of any equipment and avoid becoming indifferent to those dangers. Most injuries occur to people who are familiar with equipment and who begin to shortcut the safety requirements of operation.

If you are asked by the customer to pick up loads that are too heavy for you, or if you are asked to remove a safety device or to reach into a pinch point of a machine, then you should ask to see the plant safety person. If they instruct you to do it anyway, and you still question the safety, you may call Jeff who will talk to the customer's safety manager about the problem. If Jeff decides that the job is unsafe, you will be reassigned to other available work, rather than make you do the unsafe act.

When you come in to get your paycheck each week, and at the end of your assignment, you will be asked to fill out a confidential survey about unsafe conditions at the job. So that we can make sure that those conditions are investigated, before we assign anyone else to the client.

I have read and been given a copy of this letter.

Employee

Date

Witness