

JDMJANITORIAL

WE EMPTY YOUR TRASH NOT YOUR POCKETS".

Health, Safety & Environmental Program

Connie Holguin

JDM Janitorial Inc.

11/1/2021



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	Phone Number	(682) 404-7711	CMS
	Revision Date	11/1/2021	COMPLIANCE MANAGEMENT SERVICE

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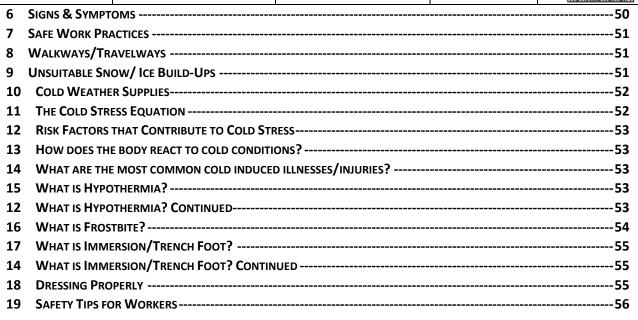
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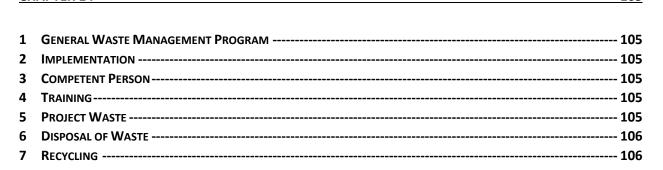
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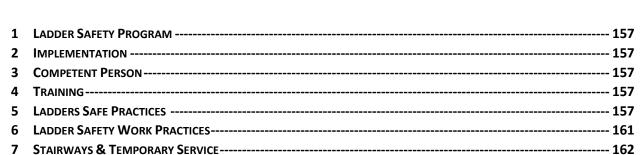
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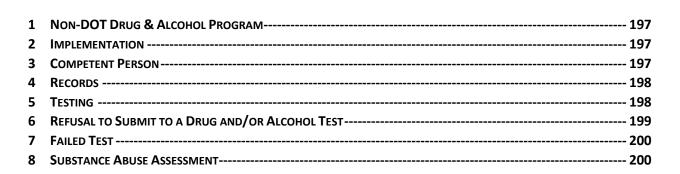
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Safety Coordinator	Connie Holguin	
Phone Number	(682) 404-7711	EMS
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CHAPTER 1

1 HSE Mission Statement

- 1.1 The Health, Safety and Environmental Department (HSE) supports the overall mission and goals of JDM Janitorial Inc. by developing, implementing, and administering comprehensive environmental health and safety services, policies, and procedures throughout the organization.
- 1.2 HSE seeks to develop and implement sound and effective policies and procedures that protect public health, prevent personal injury, and maintain regulatory compliance in the areas of chemical, biological, and radiation safety; occupational health and safety; and environmental stewardship.
- 1.3 We are dedicated to reducing injuries, accidents and environmental impact and ensuring compliance.
- 1.4 We achieve this by providing high-quality training, comprehensive workplace evaluation, emergency response, hazardous materials management from acquisition to disposal and by managing regulatory information.

2 Responsibilities

- 2.1 Safety is the responsibility of every employee, and everyone participates in activities to ensure a safe work environment.
- 2.2 Connie Holguin and Safety Committee are responsible for leadership of the overall safety effort and for providing all resources which are necessary for an effective program of accident prevention.
- 2.3 Supervisors are responsible for maintaining safe work conditions within their areas and for ensuring that all operations are carried out with the utmost regard for safety.
- 2.4 Each employee is responsible for consistently following all established safety procedures, for promptly reporting potential hazards, and for fostering a proactive culture focused on the safe and responsible use of JDM Janitorial Inc.'s facilities.
- 2.5 Maintaining a safe work environment is a top priority and must be a personal goal of every employee.

Endorsed By:	(Title)		
Signature:		Date:	



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CHAPTER 2

1 Behavior Based Safety Program

- 1.1 The goal of a Behavior Based Safety process is to create a total safety culture in the workplace.
- 1.2 The process focuses on observing and correcting behaviors, not attitudes, that are critical to safety.
- 1.3 Employee behavior is measurable; attitudes are not. But Behavior-Based Safety can affect attitudes. Behavior-Based Safety is successful because it fully engages the entire workforce.
- 1.4 JDM Janitorial Inc. has developed the following policy on Behavior Based Safety to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vest, hard hats, work boots, work gloves, eye & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees on Behavior Based Safety.
- 4.2 This training will include:
- 4.2.1 Program objectives and incident metrics reviewed,
- 4.2.2 How to conduct the observation,
- 4.2.3 How to complete the observation form,
- 4.2.4 What do the behaviors mean,
- 4.2.5 Feedback training and role play (mentoring and coaching),
- 4.2.6 Employees should be aware they may be observed at any time.

5 Design Team

- 5.1 A design team will be composed of hourly workers, supervisors, managers and safety personnel.
- 5.2 The team designs forms, establishes training protocol, collects data, sets goals, and identifies roles and responsibilities for the Behavior-Based Safety process.



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6 Identify Critical Behaviors

- 6.1 Identify critical behaviors that are causing or have the potential to cause injury
- 6.2 These steps will help you identify behaviors that need to be changed.
- 6.3 Why the employee is performing these tasks in an unsafe manner.
- 6.4 Steps to identify critical behaviors:
- 6.4.1 Look at incident trends to determine which processes carry the greatest risk for incidents.
- 6.4.2 Conduct a hazard evaluation of the facility to determine the areas that have the greatest risk for an incident.
- 6.4.3 Look at tasks that have the potential for serious injury or death.
- 6.4.3.1 An example would be a confined space entry operation into a vessel that contains a toxic chemical.
- 6.5 Once the critical behaviors have been identified, ensure that effective engineering and/or administrative controls have been implemented.
- 6.6 Eliminating the hazard should be the first priority.
- 6.7 You can then work on changing behaviors.
- 6.8 Pinpoint those practices:
- 6.8.1 After the behaviors have been identified, break down each step in the process.
- 6.8.2 The steps should be detailed enough so that independent observers evaluating the same employee will get the same results.
- 6.8.3 For example, one of the items on the checklist is personal protective equipment (PPE). Be specific about what PPE is required. Don't leave it up to the observer to decide.
- 6.9 Break down the task into the following four critical behaviors:
- 6.9.1 PPE Determine what personal protective equipment is required to perform the task. Be specific so that the person conducting the observation knows exactly what to look for.
- 6.9.2 Housekeeping The observer will evaluate the work area and document its condition.
- 6.9.3 Using Tools and Equipment The observer needs to know the appropriate tools and equipment that are to be used while performing this task. They should also understand how the tools are to be used safely.
- 6.9.4 Body Positioning/Protection The observer will determine if the employee is performing the task in a manner that will protect him from strains, falling objects, exposure to a sudden release of chemicals, etc.



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7 Behavior Observation Checklist

- 7.1 Observation checklists help provide direct, measurable information on employees' work practices.
- 7.2 The observer must use the checklist to document employees performing their routine task(s).
- 7.3 The observer must record safe and unsafe behaviors on the checklist.
- 7.4 This information will be used to provide feedback and measure progress toward goals.
- 7.5 Use the critical behaviors and practices you identified to develop the checklist.
- 7.6 Limit the checklist to 5 10 critical behaviors. This will make it simple and easy to use.
- 7.7 An example of a checklist for a grinding operation is shown on the next page:



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7.8 Behavior Observation Checklist

Observer:		Date:		
Department:		Time:		
Operating Procedures	Safe	At Risk	Comments	% Safe
PPE : Using required personal protective equipment. Face shield, safety glasses, gloves and hearing protection				
Housekeeping: Work area maintained safely (e.g., trash and scrap picked up, no spills, walk ways clear, materials and tools organized)				
Using Tools and Equipment Guards are in place, tool rest adjusted to within 1/8," grinding wheel in good condition, grinder secured				
Body Positioning/Protecting Hand positioned to avoid pinch point.				

*To determine percent safe, divide number of safe observations by the total number of observations for each task.



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8 Observation and Feedback Procedures

- 8.1 Observation and feedback are the most important components of the Behavior-Based Safety process.
- 8.2 Observation provides the data that makes this process uniquely effective.
- 8.3 Frequent, objective, feedback is essential in maintaining any safe behavior.
- 8.4 Provide positive feedback for safe behaviors, and non-threatening, instructive feedback on how to correct unsafe behaviors.
- 8.5 Finalize the checklist, then follow these steps to design the observation and feedback procedures:
- 8.5.1 Determine who will conduct the observations.
- 8.5.2 Determine the frequency of the observations.
- 8.5.3 Develop the observation procedures.
- 8.5.4 Determine who will provide feedback and when.
- 8.5.5 Give training on conducting observations and providing feedback.

9 Who will Conduct Observations

- 9.1 Observers will include members of the design team and additional volunteers.
- 9.2 One observer will be obtained from each shift or department.
- 9.3 Management must also allow observers and other design team members the time needed to participate in this process.

10 Frequency of Observations

- 10.1 The risks associated with the task will determine whether the observations are performed daily, weekly, or monthly.
- 10.2 If the task is high risk, the observations will be conducted daily.
- 10.3 Different levels of management may also conduct observations at different intervals. Peers may conduct observations weekly, supervisors biweekly, and management monthly. Having management periodically conduct observations will help with quality control.



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11 Observation procedures

- 11.1 The observer will watch the employee work, and will use the checklist to record the number of safe and unsafe acts the employee performs.
- 11.2 The observations should take no longer than 15 20 minutes to complete.
- 11.3 In the example on the next page, the observer will also record the number of times appreciative and constructive feedback was given.
- 11.4 Positive feedback is given immediately to employees who exhibit safe behaviors.
- 11.5 Constructive feedback is given in a non-threatening manner to employees who exhibit unsafe behaviors.
- 11.6 The objective is to point out the unsafe behaviors the employee is performing, as well as the safe behaviors he should be performing.



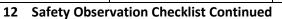
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12 Safety Observation Checklist

Observer:			Date:			
Department:			Time:			
Conditions		Safe	At- Risk	Apprec. Feedback	Constr. Feedback	% Safe
1. Forklift warning device operational	S					80
2. Forklift driver's compa free of debris	rtment		++++			29
3. Forklift propane tank c locked in place	lamps	++++				83



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	Safe	At- Risk	Apprec. Feedback	Constr. Feedback	% Safe
Behaviors	Sale	RISK	reeuback	Feedback	Sale
1. Operator's driver's license displayed above the waist	++++				100
2. Forks 6" or less from ground when traveling					60
3. Seat belts worn during forklift operation		++++			0
4. Sets parking brake, puts forks to floor, puts gear in neutral, and shuts off when leaving forklift unattended					100
5. Sounds horn when exiting trailer					0
 Wears authorized safety footwear, gloves and eye protection 					80
7. Uses approved lift cage when transporting or elevating people					
8. Removes freight from side of forks					100
Comments:	L	1	1	L	1

*To determine percent safe, divide number of safe observations by the total number of observations for each task.



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- 13 Who will Provide Feedback and When
- 13.1 Who will provide the feedback?
- 13.1.1 Employees will be trained to be coaches,
- 13.1.2 Feedback will be assigned to specific positions.
- 13.2 How often will feedback be given?
- 13.2.1 Daily or weekly feedback will be conducted based on the risks associated with job tasks, the number of targeted employees, whether different areas or levels of employee will coach at different frequencies, and whether feedback is voluntary or required.
- 13.2.2 The feedback is typically given immediately following the observation.
- 13.2.3 The observer lets the employee know which critical behaviors they are performing safely and which ones they are performing unsafely.
- 13.2.4 In the course of the discussion, the observer may uncover system barriers to safe performance. During the feedback session, the observer asks the employee why he is not wearing a face shield.
- 13.2.5 The observer may learn that the face shield the employee had been using was cracked and there were no others available. If the unsafe behavior may call for a disciplinary action, a peer should not provide feedback.
- 13.2.6 The supervisor should deal with the concern.
- 13.2.7 Feedback should also be given to the department as a whole. The safe and unsafe behaviors being observed should be discussed with everyone so the department can make needed corrections.

14 Identify & Set Improvement Goals

- 14.1 Setting improvement goals increases the effectiveness of feedback and the success of the Behavior-Based Safety process.
- 14.2 These goals should be based on the workers' perceptions of their work practices and how they can improve.
- 14.3 Action plans are then developed to support their efforts and help them achieve their goals.



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- 14 Identify & Set Improvement Goals Continued
- 14.4 These goals can take different forms:
- 14.4.1 Percent safe goals:
- 14.4.1.1 These goals can be based on safe work practices observed.
- 14.4.1.2 They must be based on a realistic evaluation of the area's level of safety.
- 14.4.1.3 They should also be set for a short time period. One to three months is common.
- 14.4.2 Process goals:
- 14.4.2.1 These goals focus on improving a specific work practice, such as using proper lifting techniques. If any employee is observed using unsafe lifting techniques, the goal could be to reduce the percentage of times that technique is observed.
- 14.4.3 Implementation Goals
- 14.4.3.1 These goals focus on maintaining the Behavior-Based Safety process. An example would be setting a goal to increase the number of observations conducted in a week.
- 14.5 The first step in developing goals is to develop a baseline.
- 14.6 Conduct the observations for at least 4 weeks to develop the baseline.
- 14.7 After the baseline is developed, compare future observations with the baseline, and track them for improvements.
- 14.8 For example: If there were 20 items on the checklist, and the worker performed 17 of them safely, then he would get a score of 85% safe.
- 14.9 The improvement between observations could be graphed and displayed for employees to view.
- 14.10 When the graph shows improvement, it provides positive reinforcement feedback to employees.



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- 15 Procedures for Providing Positive Reinforcement
- 15.1 Providing positive reinforcement when employees improve or attain goals is the key to a successful Behavior-Based Safety process.
- 15.2 Positive reinforcement usually takes one of these forms:
- 15.2.1 Immediate verbal feedback.
- 15.2.2 Graphical feedback placed in strategic locations in the workplace.
- 15.2.3 Weekly/monthly briefings, during which the observation scores are analyzed to provide detailed feedback about specific behaviors.
- 15.2.4 Plan training and kickoff meetings.
- 15.3 For the Behavior-Based Safety process to be successful, employees will need training in these areas:
- 15.3.1 The rationale and basic theory of the Behavior-Based Safety process,
- 15.3.2 Observation skills,
- 15.3.3 Use of the checklist,
- 15.3.4 The observation procedure,
- 15.3.5 Feedback skills,
- 15.3.6 Leading meetings to review safety data,
- 15.3.7 Job-related skills identified on the safety checklist.
- 15.4 This training can be accomplished by:
- 15.4.1 Individual coaching (tell, show, observe and provide feedback),
- 15.4.2 Mentors,
- 15.4.3 Seminars or workshops,
- 15.4.4 Videos and slides.



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16 Action Plans

- 16.1 Once trend analysis is complete, appropriate action plans will be developed to address unsafe behaviors.
- 16.2 Action planning will include:
- 16.2.1 Evaluate unsafe behaviors from trend analysis and prioritize,
- 16.2.2 Develop action plan for unsafe behaviors based on comments and feedback from data sheets,
- 16.2.3 Designate responsible parties and timeframes within the action plan,
- 16.2.4 Define who is responsible for action planning,
- 16.2.5 Ensure management support.

17 Measure Success

- 17.1 The success of the Behavior-Based Safety process can be measured in different ways.
- 17.2 Reaching the goals that you set is one measurement of success.
- 17.3 If employees are performing their tasks with a higher percentage of safe behaviors, injuries are less likely to occur.
- 17.4 Incident rate can be calculated at the beginning of the process and evaluated at different intervals.
- 17.5 The decrease in unsafe behaviors should correlate with a decrease in the incident rate.
- 17.6 Incident rate is calculated by multiplying the number of claims by 200,000 and dividing that by total man-hours worked.
- 17.7 Individual departments, as well as JDM Janitorial Inc. as a whole, will compare these measurements and track these results by an acceptable method so that numerical and statistical comparisons can be made over time.



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CHAPTER 3

1 Bloodborne Pathogens Program

- 1.1 The program covers Bloodborne pathogens which are infectious microorganisms in human blood that can cause disease in humans. These pathogens include, but are not limited to, hepatitis B (HBV), hepatitis C (HCV) and human immunodeficiency virus (HIV).
- 1.2 JDM Janitorial Inc. has developed the following policy on Bloodborne Pathogens to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting with signatures.
- 2.2 Training Records: Must be kept for 3 years.
- 2.3 Hepatitis B Vaccine: Required for those with occupational exposure.
- 2.4 Medical Records: Must be kept for duration of employment plus 30 years.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 It is the policy of JDM Janitorial Inc. that training will be provided at the time of initial assignment for employees whose job duties pose a risk of infection from bloodborne pathogens or have the potential to be exposed to bodily fluids.
- 4.2 Training must be conducted at least annually thereafter.
- 4.3 Training records will be kept for a minimum of 3 years.

5 Universal Precautions

- 5.1 It is a requirement of JDM Janitorial Inc. that employees whose job duties pose a risk of infection from bloodborne Pathogens follow the following universal precautions:
- 5.2 Employees to observe Universal Precautions to prevent contact with blood or other potentially infectious materials (OPIM).
- 5.3 Under circumstances in which differentiation between body fluid types is difficult or impossible, all body fluids shall be considered potentially infectious materials.
- 5.4 Treat all blood and other potentially infectious materials with appropriate precautions such as:
- 5.5 Use gloves, masks, and gowns if blood or OPIM exposure is anticipated.
- 5.6 Use engineering and work practice controls to limit exposure.



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6 Exposure Control Plan

- 6.1 It is the policy of JDM Janitorial Inc. to have the exposure control plan readily available to employees when the job warrants such an exposure plan.
- 6.2 The Exposure Control Plan will be reviewed and updated at least annually and whenever necessary to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.
- 6.3 An exposure determination must be made without regard to the use of personal protective equipment.
- 6.4 The various types of bodily fluids that the affected company employees can reasonably be exposed to in the workplace to include, but is not limited to blood, mucus, and saliva.

7 Handwashing Facilities

7.1 Handwashing facilities or antiseptic hand cleanser will be available to all employees whose job duties pose a risk of infection from bloodborne pathogens.

8 Personal Protective Equipment

- 8.1 Personal protective equipment will be provided to all employees at no cost and must be used, whose job duties pose a risk of infection from bloodborne pathogens. For Example:
- 8.1.1 Latex/Non-Latex Gloves,
- 8.1.2 Masks,
- 8.1.3 Aprons/long sleeves.
- 8.2 Personal protective equipment will be repaired or replaced as need by JDM Janitorial Inc.

9 Equipment/Working Surfaces

9.1 Any equipment in contact with blood or other infections material must be decontaminated.

10 Vaccines

10.1 It is a requirement of JDM Janitorial Inc. to provide employees at no cost with the Hepatitis B vaccination whose job duties pose a risk of infections from occupational exposure to bloodborne pathogens.

11 Medical Records

11.1 Medical record will be kept for each employee with occupational exposure for a minimum of 30 years after the duration of employment.



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12 Warning & Signs

12.1 Warning labels and signs must be used to warn employees of items containing blood or other potentially infectious material.

13 OPIM is defined as:

- 13.1 The following human body fluids: semen, vaginal secretions, cerebrospinal fluid, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva in dental procedures,
- 13.2 Any bodily fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids;
- 13.2.1 Any unfixed tissue or organ (other than intact skin) from a human (living or dead); and
- 13.2.2 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.

14 CDC Standard Precautions

- 14.1 The CDC recommends these Standard Precautions for the care of all patients, regardless of their diagnosis or presumed infection status.
- 14.1.1 Standard precautions include the use of: hand washing, appropriate personal protective equipment such as gloves, gowns, masks, whenever touching or exposure to patients' body fluids is anticipated.
- 14.1.2 Transmission-based precautions can be used for patients with known or suspected to be infected or colonized with epidemiologically important pathogens that can be transmitted by airborne or droplet transmission or by contact with dry skin or contaminated surfaces. These precautions should be used in addition to standard precautions.
- 14.1.3 Airborne Precautions, Droplet Precautions, and Contact Precautions. May be combined for diseases that have multiple routes of transmission. When used either singularly or in combination, they are to be used in addition to Standard Precautions.
- 14.1.3.1 Airborne Precautions used for infections spread in small particles in the air such as chicken pox.
- 14.1.3.2 Droplet Precautions used for infections spread in large droplets by coughing, talking, or sneezing such as influenza.
- 14.1.3.3 Contact Precautions used for infections spread by skin to skin contact or contact with other surfaces such as herpes simplex virus.



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15 Post Exposure

- 15.1 An exposure incident to bloodborne pathogens is defined as an 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.
- 15.2 It is the policy of JDM Janitorial Inc. to include Good Samaritan acts performed by an employee at the work site.
- 15.3 Whenever an exposure occurs, wash the contaminated skin immediately with soap and water.
- 15.4 Immediately flush contaminated eyes or mucous membranes with copious amounts of water.
- 15.5 Medically evaluate exposed employees as soon as possible after the exposure incident in order that post-exposure prophylaxis, if recommended, can be initiated promptly.
- 15.6 The medical evaluation is to include the route(s) of exposure and the exposure incident circumstances; identification and documentation of the source individual, where feasible; exposed employee blood collection and testing of blood for HBV and HIV serological status; post-exposure prophylaxis, where indicated; counseling; and evaluation of reported illnesses.
- 15.7 Source test results and identity will be disclosed to the exposed employee according to applicable laws and regulations concerning disclosure and confidentiality.
- 15.8 JDM Janitorial Inc. has chosen a provider for hepatitis B vaccinations and medical evaluations and post-exposure follow-up after an exposure incident and has a copy of the Bloodborne Pathogen standard, 1910.1030.

16 Exposure Determination

- 16.1 Although there is not a large risk of exposure in our industry, JDM Janitorial Inc. has tried to identify exposure situations that employees may encounter.
- 16.2 The following page lists all employees with any reasonable potential for exposure, their titles and the reasons they may find themselves in an exposure situation.
- 16.2.1 For example, all supervisors who are trained in first aid and may have an occupational exposure in the event of an accident are listed.
- 16.3 The initial list was compiled on or before 11/1/2021.
- 16.4 Connie Holguin will work with department managers and supervisors to revise and update these lists as our tasks, procedures and classifications change.



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17 Work Activities Involving Potential Exposure to Bloodborne Pathogens

17.1 Listed below are the names, titles and job responsibilities that may bring these individuals into contact with human blood or other potentially infectious materials, which may result in exposure to bloodborne pathogens:

Name	Title	Job Responsibilities

18 Bloodborne Pathogens Compliance Program

- 18.1 JDM Janitorial Inc. understands that there are a number of areas that must be addressed to effectively eliminate or minimize exposure to bloodborne pathogens in any business, and although not all need to be fully addressed, each will be discussed to ensure that all areas are considered. The first four areas addressed in our plan are:
- 18.1.1 Use of "universal precautions",
- 18.1.2 Establishment of appropriate engineering controls and work practice controls,
- 18.1.3 Use of necessary personal protective equipment (PPE),
- 18.1.4 Implementation of appropriate housekeeping.
- 18.2 Each of these areas is reviewed with employees during their bloodborne pathogens training. By rigorously following the requirements of the Occupational Safety and Health Administration (OSHA's) Bloodborne Pathogens Standard in these four areas, JDM Janitorial Inc. not only comply with OSHA's standard but also eliminate or minimize its employees' occupational exposure to bloodborne pathogens as much as possible.

19 Universal Precautions

- 19.1 In the business, which includes all off-site work locations, as well as the shop, JDM Janitorial Inc. has begun the practice of "universal precautions."
- 19.2 As a result, all human blood and bodily fluids are treated as though they are known to be infected with Hepatitis B Virus (HBV), Human Immunodeficiency Virus (HIV) and other bloodborne pathogens.
- 19.3 In circumstances where it is difficult or impossible to differentiate between body fluid types, it is assumed that all body fluids are potentially infectious.
- 19.4 Connie Holguin is responsible for overseeing the Universal Precautions Program.



Potential Exposures

JDM Janitorial Inc.

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20 Engineering and Work Practice Controls

- 20.1 Engineering controls are controls that isolate or remove bloodborne pathogens hazards from the workplace.
- 20.2 Work practice controls reduce the likelihood of exposure by altering the manner in which a task is performed.
- 20.3 In our industry, blood or other bodily fluids are not worked with in an occupational manner; any exposure to these potentially hazardous substances by anyone other than the cleaning staff is almost always the result of an accident.
- 20.4 There is continual work to create safer working conditions for employees so that accidents will not occur, and all aspects of the safety program constitute work practice controls.
- 20.5 Additional controls take the form of personal protective equipment (PPE), hand washing and other controls that occur immediately during and after an accident on a job site.
- 20.6 Listed below are potential exposure situations and the engineering or work precautions taken to minimize risks.
- 20.7 Connie Holguin is responsible for the Engineering and Work Practice Controls program.

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Precaution

- 20.8 This list is re-examined during an annual exposure control plan review, and opportunities for new or improved controls are identified.
- 20.9 Any existing equipment is checked for proper function and needed repair or replacement every 3 months by the supervisor of the crew or job site.

21 Personal Protective Equipment

- 21.1 Personal protective equipment is employees' line of defense against bloodborne pathogens. Because of this, JDM Janitorial Inc. provides (at no cost to the employees) the PPE they need to protect themselves against exposures.
- 21.2 JDM Janitorial Inc. shall ensure that PPE is used unless the employee temporarily and briefly declined to use PPE in rare circumstances.



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21.3 PPE at the office and work sites include:

- 21.4 Connie Holguin is responsible for ensuring that all work sites have appropriate PPE available for employees.
- 21.5 Employees are trained regarding the need for appropriate PPE for their job responsibilities. Additional training is provided when necessary, for example, if an employee takes a new position or if new job functions are added to his current position.
- 21.6 To ensure that PPE is not contaminated and is in the appropriate condition to protect employees from potential exposure, our JDM Janitorial Inc. adheres to the following practices:
- 21.6.1 All PPE is inspected periodically and repaired or replaced, as needed, to maintain effectiveness.
- 21.6.2 Single-use PPE is disposed of immediately after use.
- 21.7 To make sure that this equipment is used as effectively as possible, employees adhere to the following practices when using their PPE:
- 21.7.1 Any garments penetrated by blood or other body fluids are removed as soon as feasible.
- 21.7.2 All potentially affected PPE is removed prior to leaving the work area.
- 21.7.3 Gloves are worn whenever an employee anticipates handling or touching contaminated items or surfaces.
- 21.7.4 Disposable gloves are replaced as soon as practical after contamination or when they are torn, punctured or otherwise lose their ability to function as an exposure barrier.

22 Housekeeping

- 22.1 Maintaining its shop, office and work sites in clean and sanitary condition is an important part of JDM Janitorial Inc.'s exposure control plan.
- 22.2 Employees are trained to promptly dispose of or clean any surface that comes into contact with bodily fluids, in keeping with the other sections of this program.
- 22.3 There is no reason to anticipate regular exposure to bodily fluids by employees, other than the janitorial staff, so there is no routine schedule for decontamination at work sites.



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- 22.4 The janitorial staff employs the following practices:
- 22.4.1 All equipment and surfaces are cleaned and decontaminated after contact with blood or other potentially infectious material.
- 22.4.2 Protective coverings (such as plastic trash bags) are removed and replaced at the end of the work shift if they have been contaminated during the shift.
- 22.4.3 All trash containers, pails and bins are routinely cleaned and decontaminated as soon as possible after contaminated.
- 22.5 Connie Holguin is responsible for overseeing the cleaning and decontamination process and making sure that it is carried out regularly.
- 22.6 JDM Janitorial Inc. is very careful in its facility and on its work sites when handling regulated waste (including used bandages, tissues, feminine hygiene products and any other potentially infectious materials).
- 22.6.1 They are discarded or bagged in containers that are:
- 22.6.2 Closeable,
- 22.6.3 Puncture-resistant,
- 22.6.4 Leak-proof (if the materials have the potential to leak,
- 22.6.5 Red in color or labeled with the appropriate biohazard warning label.
- 22.7 Containers used for these purposes are placed in appropriate locations within easy access of employees and as close as possible to the sources of the waste.
- 22.8 Waste containers are maintained upright and not allowed to overfill.
- 22.9 Whenever employees move containers of regulated waste from one area to another, the containers are immediately closed and placed inside a secondary container, if leakage is possible from the first container.
- 22.10 Connie Holguin is responsible for the collection and handling of the facility's contaminated waste.

23 Hepatitis B Vaccination Employee List

- 23.1 For the purposes of compliance with the Occupational Safety and Health Administration's General Duty Clause, JDM Janitorial Inc. has prepared a written exposure control plan and implemented a training program on bloodborne pathogens.
- 23.2 The majority of employees are not exposed to bloodborne pathogens, and any exposure would be the result of an on-the-job accident only.
- 23.3 For this reason, Hepatitis B vaccinations are not offered, except to those employees required by the company to be certified in first aid and any members of the janitorial staff employed by this business.
- 23.4 If a janitorial company contracts with JDM Janitorial Inc., vaccination will not be offered to those employees.



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23.5 Employees who have been offered the Hepatitis B vaccination include the following:

24 Declination

24.1 In the event that any employees who are offered the Hepatitis B vaccination series decide to decline the series, they must read and sign the mandatory Hepatitis B Vaccine Declination form on the next page.



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25 Hepatitis B Vaccine Declination Form

- 25.1 I understand that because of my occupational exposure to blood or other potentially infectious materials, I may be at risk of acquiring the Hepatitis B Virus (HBV).
- 25.2 I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to me.
- 25.3 At this time, however, I decline the Hepatitis B vaccination.
- 25.4 I understand that by declining this vaccine, I continue to be at risk for acquiring Hepatitis B, a serious disease.
- 25.5 If in the future I want to be vaccinated with the Hepatitis B vaccine, I can receive the vaccination series at no charge to me.

Employee Date

Supervisor Date



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26 Post-Exposure Evaluation and Follow-Up

- 26.1 If employees are involved in an incident where exposure to bloodborne pathogens may have occurred, there are two efforts on which to immediately focus:
- 26.1.1 Investigating the circumstances surrounding the exposure incident.
- 26.1.2 Making sure that employees receive medical consultation and treatment (if required) as expediently as possible.
- 26.2 Connie Holguin investigates every exposure incident that occurs in the company facilities or on work sites.
- 26.3 This investigation is initiated within 24 hours of the incident and involves gathering the following information:
- 26.3.1 Date and time when the incident occurred,
- 26.3.2 Where the incident occurred,
- 26.3.3 What potentially infectious materials were involved in the incident,
- 26.3.4 Source of the material,
- 26.3.5 Under what circumstances the incident occurred,
- 26.3.6 How the incident was caused,
- 26.3.7 Personal protective equipment in use at the time of exposure,
- 26.3.8 Actions taken as a result of the exposure (decontamination, clean-up, notifications).
- 26.4 After this information is gathered, it is evaluated, and a written summary of the incident and its cause is prepared.
- 26.5 Recommendations are then made for avoiding similar incidents in the future (see the Incident Investigation Form at the end of this section).
- 26.6 To make sure employees receive the best and most timely treatment when an exposure to bloodborne pathogens occurs, an evaluation and follow-up process has been set up.
- 26.7 The checklist at the end of this section will be used to verify that all the steps in the process have been taken correctly. This process is overseen by Connie Holguin.
- 26.8 Much of the information involved in this process must remain confidential, and everything possible will be done to protect the privacy of the people involved.
- 26.9 As the first step in this process, an exposed employee will be provided with the following confidential information:
- 26.9.1 Documentation of the routes of exposure and circumstances under which the exposure incident occurred,
- 26.9.2 Identification of the source individual (unless protected by law).
- 26.10 (As previously stated, most exposure to bodily fluids will be the result of a workplace accident, and this information will be known.)



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- 26.11 Next, if possible, the source individual's blood will be tested to determine whether the Hepatitis B Virus (HBV) and the Human Immunodeficiency Virus (HIV) is present.
- 26.11.1 This information will be made available to the exposed employee, if it is obtained.
- 26.11.2 At that time, the employee will be made aware of any applicable laws and regulations concerning disclosure of the identity and infectious status of the source individual.
- 26.12 Finally, the blood of the exposed employee is collected and tested for HIV and HBV, if needed.
- 26.13 Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified health care professional to discuss the employee's medical status.
- 26.13.1 This includes an evaluation of any reported illnesses, as well as any recommended treatment.

27 Information Provided to Health-Care Professionals

- 27.1 To assist health-care professionals, [company name] forwards a number of documents to them, including the following:
- 27.1.1 A description of the exposure incident,
- 27.1.2 The exposed employee's relevant medical records,
- 27.1.3 Any other pertinent information.

28 The Health-Care Professionals' Written Opinion

- 28.1 After the consultation, health-care professionals will provide JDM Janitorial Inc. with a written opinion evaluating the exposed employee's situation. In turn, a copy of this opinion will be furnished to the exposed employee.
- 28.2 In keeping with this process's emphasis on confidentiality, the written opinion will contain only the following information:
- 28.2.1 Whether the Hepatitis B vaccination is indicated for the employee,
- 28.2.2 Whether the employee has received the Hepatitis B vaccination,
- 28.2.3 Confirmation that the employee has been informed of the results of the evaluation,
- 28.2.4 Confirmation that the employee has been told about any medical conditions resulting from the exposure incident time require further evaluation or treatment.
- 28.3 All other findings or diagnoses will remain confidential and will not be included in the written report.

29 Medical Record Keeping

- 29.1 To ensure that as much medical information as possible is available to the participating health-care professionals, comprehensive medical records will be kept on employees.
- 29.2 Connie Holguin is responsible for setting up and maintaining these records, which include the following information:



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- 29.2.1 Name of employee,
- 29.2.2 Social security number of the employee,
- 29.2.3 Copies of the results of the examinations, medical testing and follow-up procedures that took place because of an employee's exposure to bloodborne pathogens,
- 29.2.4 A copy of the information provided to the consulting health-care professional.
- 29.3 As with all personal information, it is important that all medical records be kept confidential.
- 29.4 They will not be disclosed or reported to anyone without an employee's written consent (except as required by law).

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30 Exposure Incident Investigation Form

Date of Incident:	Time of Incident:		
Location:			
Potentially Infectious Materials Involv	ed:		
Туре:	Source:		
	d, etc.):		
How Incident Was Caused (accident, e	equipment malfunction, etc.):		
Personal Protective Equipment Being	Used: n-up, reporting, etc.):		
	ition:		
Report Prepared by:		Date:	
Supervisor		Date [,]	



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31 Post-Exposure Evaluation and Follow-Up Checklist

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

Employee's Name:			
Employee furnished with documen	tation regarding	exposure incident.	
Source individual identified:	Yes	No	
Source individual's blood collected	and tested, and	results given to exposed employee.	
Consent from source ind	ividual could not	t be obtained.	
Exposed employee's blood collecte	d and tested.		
Appointment arranged for employ	ee with health-ca	are professional.	
Documentation forwarded to healt	h-care professio	nal.	
Description of exposed e	mployee's dutie	S	
Description of exposure	incident, includir	ng routes of exposure	
Bocult of course individu	al's blood tostin	a	

_____ Result of source individual's blood testing Employee's medical records

32 Information and Training

- 32.1 Having well-informed and trained employees is extremely important when attempting to eliminate or minimize employees' exposure to bloodborne pathogens.
- 32.2 For this reason, all employees who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program and furnished with as much information as possible on this issue.
- 32.3 Employees will be retrained at least annually to keep their knowledge current.
- 32.4 Additionally, all new employees, as well as employees changing jobs or job functions, will be given any additional training their new position require at the time of their new job assignment.
- 32.5 Connie Holguin is responsible for seeing that all employees who have the possibility
- 32.6 of being exposed to bloodborne pathogens receive this training.



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33 Training Topics

- 33.1 The topics to be covered in our training program include, but are not limited to, the following:
- 33.1.1 The Occupational Safety and Health Administration's (OSHA's) Bloodborne Pathogens Standard.
- 33.1.2 The epidemiology and symptoms of bloodborne diseases.
- 33.1.3 The modes of transmission of bloodborne pathogens.
- 33.1.4 JDM Janitorial Inc. exposure control plan (and where employees can obtain a copy).
- 33.1.5 Appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious material.
- 33.1.6 A review of the use and limitations of methods that will prevent or reduce exposure, including:
- 33.1.7 Engineering and work practice controls.
- 33.1.8 Selection and use of personal protective equipment, including:
- 33.1.8.1 Types available,
- 33.1.8.2 Proper use,
- 33.1.8.3 Location,
- 33.1.8.4 Removal,
- 33.1.8.5 Handling,
- 33.1.8.6 Decontamination,
- 33.1.8.7 Disposal.
- 33.1.8.8 Actions to take and people to contact in an emergency involving blood or other potentially infectious materials.
- 33.1.8.9 The procedures to follow if an exposure occurs, including the incident reporting.
- 33.1.8.10 Information on the facility-provided post-exposure evaluation and follow-up, including medical consultation.

34 Training Methods

- 34.1 JDM Janitorial Inc.'s training presentations make use of several training techniques including, but not limited to:
- 34.1.1 Classroom-type atmosphere with personal instruction,
- 34.1.2 Videotape programs,
- 34.1.3 Training manuals and employee handouts,
- 34.1.4 Employee review sessions.



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34.2 Because we feel employees need an opportunity to ask questions and interact with their instructors, time is set aside specifically for these activities in each training session.

35 Record Keeping

- 35.1 To facilitate the training of employees, as well as to document the training process, training records containing the following information are maintained:
- 35.1.1 Dates of all training sessions,
- 35.1.2 Contents/summary of the training sessions,
- 35.1.3 Names and qualifications of instructors,
- 35.1.4 Names and job titles of employees attending the training sessions.
- 35.2 These training records are available for examination and copying to employees and their representatives, as well as OSHA and its representatives.

36 Sharps Injury Log

Date	Case/ Report No.	Type of Device examples: syringe, suture needle)	Brand Name of Device	Work Area where injury occurred examples: Geriatrics, Lab)	Brief description of how the incident occurred (examples: procedure being done, action being performed (injection, disposal), body part injured.



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37 Bloodborne Pathogens Training Roster

Date of Training: _____

Training Topic:

Instructors and Their Qualifications:

 Attendee Name &
 Attendee Signature
 Attendee Job Title



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CHAPTER 4

1 Cold Weather Safety / Cold Stress Program

- 1.1 Anyone working in a cold environment may be at risk of cold stress. Some workers may be required to work outdoors in cold environments and for extended periods, for example, snow cleanup crews, sanitation workers, police officers and emergency response and recovery personnel, like firefighters, and emergency medical technicians. Cold stress can be encountered in these types of work environment.
- 1.2 What constitutes extreme cold and its effects can vary across different areas of the country. In regions that are not used to winter weather, near freezing temperatures are considered "extreme cold." A cold environment forces the body to work harder to maintain its temperature. Whenever temperatures drop below normal and wind speed increases, heat can leave your body more rapidly.
- 1.3 Wind chill is the temperature your body feels when air temperature and wind speed are combined. For example, when the air temperature is 40°F, and the wind speed is 35 mph, the effect on the exposed skin is as if the air temperature was 28°F.
- 1.4 Cold stress occurs by driving down the skin temperature and eventually the internal body temperature (core temperature). This may lead to serious health problems, and may cause tissue damage, and possibly death.
- 1.5 JDM Janitorial Inc. has developed the following policy on Cold Weather Safety to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, 3 loose layers of clothing, gloves, boots, eye, face & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 All JDM Janitorial Inc. employees will be trained on the hazards on working in cold environments.
- 4.2 Employees exposed to cold will receive initial and annual training regarding the health effects of cold exposure, proper rewarming procedures, recognition and first aid for frostbite and hypothermia, required protective clothing, proper use of warming shelters, the buddy system, vehicle breakdown procedures, and proper eating and drinking habits for working in the cold.
- 4.3 The training will consist of the information contained within this procedure.
- 4.4 Retraining will be conducted when warranted by an accident or other evidence of the employee's lack of understanding or compliance with the program.



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- 4.5 Training will be provided for employees on how to prevent and recognize cold stress illnesses and injuries and how to apply first aid treatment.
- 4.6 Workers will be trained on the appropriate engineering controls, personal protective equipment and work practices to reduce the risk of cold stress.

5 Work Considerations

- 5.1 One aspect of the work environment that must be taken into consideration when planning and conducting projects in winter months (e.g. November through March) is the occurrence of adverse and harsh weather conditions.
- 5.2 An assessment will be conducted to identify the types of jobs or employees who are at risk for cold exposure.
- 5.3 Cold weather can cause physical discomfort, loss of efficiency, and possibly injury or death.
- 5.4 Connie Holguin will be responsible for the daily monitoring of temperature and wind speed, which may result in cold stress to employees.
- 5.5 In addition, employees will be kept aware of the effects of cold stress. When outdoor temperatures are expected to be below (500 F), near freezing (300 F) or below, employees should pace themselves, especially if wearing heavy clothing, and take frequent rest breaks if directly involved with strenuous activities (e.g. lifting, pushing, etc.). Proper intake of non-caffeinated beverages (e.g. water, commercial electrolyte balanced drinks) is encouraged periodically throughout the workday in order to maintain proper fluid level retention and avoiding dehydration.

6 Signs & Symptoms

- 6.1 If an employee experiences one or more of the following:
- 6.1.1 Pale, cool moist skin,
- 6.1.2 Heavy or no sweating,
- 6.1.3 Muscle spasms,
- 6.1.4 Pain in hands, feet, or abdomen,
- 6.1.5 Strong, rapid, pulse rate,
- 6.1.6 Dizziness or nausea,
- 6.1.7 Confusion,
- 6.1.8 Fainting,
- 6.1.9 Red, hot, or drier than normal skin.
- 6.2 It is strongly advised that they should immediately sit down and attempt to alert a coworker to notify the site supervisor, who will take appropriate measures.
- 6.3 If a worker experiences the following disorders, especially during exhaustive, high physical activity periods outdoors in winter months:



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- 6.3.1 Uncontrollable shivering,
- 6.3.2 Vague or slowed speech,
- 6.3.3 Memory lapses,
- 6.3.4 Incoherence,
- 6.3.5 Drowsiness,
- 6.3.6 Changing color of skin,
- 6.3.7 Decreasing blood pressure, pulse rate, or respiration.
- 6.4 That person may be exhibiting early warning signs of cold stress. It is imperative to get this person acclimatized to a warmer (preferably indoors, at ambient temperatures) location as soon as possible and re-hydrated with non-caffeinated, sweetened beverages.

7 Safe Work Practices

- 7.1 The following practices will be used to help prevent cold stress and related injuries:
- 7.1.1 Ensure workers have suitable clothing for working in cold conditions.
- 7.1.2 Postpone outdoor work if temperatures are less than 40 degrees and there is rain.
- 7.1.3 Conduct outdoor operations during the middle of the day to take advantage of solar heat load.
- 7.1.4 Provide a heated space for workers to take breaks.
- 7.1.5 Ensure worker stay adequately hydrated.
- 7.1.6 Workers and Supervisors should know the signs and symptoms of cold-related illness.
- 7.1.7 Workers must practice the buddy system and monitor other workers on the crew for signs and symptoms of cold-related illness.
- 7.1.8 Supervisors should remind workers of the dangers, and signs and symptoms of cold related illness during daily and weekly safety briefings during periods of low temperatures.
- 7.1.9 Workers should notify the Site Safety Officer if the worker has a medical condition that would predispose him or her to cold stress. These conditions may include heart disease, high blood pressure, pulmonary diseases, obesity, lack of acclimatization, etc.

8 Walkways/Travelways

8.1 It is the policy of JDM Janitorial Inc. that regularly used walkways and travelways must be sanded, salted, or cleared of snow and ice as soon as practicable.

9 Unsuitable Snow/ Ice Build-Ups

9.1 All employees of JDM Janitorial Inc. will be informed of the dangers and destructive potential caused by unstable snow buildup, sharp icicles, and ice dams and know how to prevent accidents caused by them.



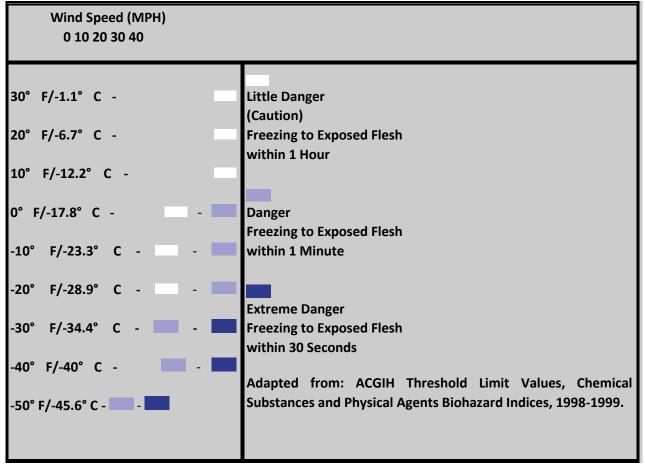
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10 Cold Weather Supplies

10.1 Cold weather supplies must be regularly inspected and restocked when necessary.

11 The Cold Stress Equation

11.1 Low Temperature + Wind Speed + Wetness = Injuries and Illnesses





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12 Risk Factors that Contribute to Cold Stress

- 12.1 Wetness/dampness, dressing improperly, and exhaustion.
- 12.2 Predisposing health conditions such as hypertension, hypothyroidism, and diabetes.
- 12.3 Poor physical conditioning.

13 How does the body react to cold conditions?

- 13.1 In a cold environment, most of the body's energy is used to keep the internal core temperature warm.
- 13.2 Over time, the body will begin to shift blood flow from the extremities (hands, feet, arms, and legs) and outer skin to the core (chest and abdomen).
- 13.3 This shift allows the exposed skin and the extremities to cool rapidly and increases the risk of frostbite and hypothermia.
- 13.4 Combine this scenario with exposure to a wet environment, and trench foot may also be a problem.

14 What are the most common cold induced illnesses/injuries?

- 14.1 Hypothermia
- 14.2 Frostbite
- 14.3 Trench Foot

15 What is Hypothermia?

- 15.1 Hypothermia occurs when body heat is lost faster than it can be replaced and the normal body temperature (98.6°F) drops to less than 95°F.
- 15.2 Hypothermia is most likely at very cold temperatures, but it can occur even at cool temperatures (above 40°F), if a person becomes chilled from rain, sweat, or submersion in cold water.
- 15.3 What are the symptoms of hypothermia?
- 15.3.1 Mild symptoms:
- 15.3.1.1 An exposed worker is alert.
- 15.3.1.2 He or she may begin to shiver and stomp the feet in order to generate heat.

12 What is Hypothermia? Continued

- 15.3.2 Moderate to Severe symptoms:
- 15.3.2.1 As the body temperature continues to fall, symptoms will worsen and shivering will stop.
- 15.3.2.2 The worker may lose coordination and fumble with items in the hand, become confused and disoriented.



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- 15.3.2.3 He or she may be unable to walk or stand, pupils become dilated, pulse and breathing become slowed, and loss of consciousness can occur. A person could die if help is not received immediately.
- 15.4 What can be done for a person suffering from hypothermia?
- 15.4.1.1 Call 911 immediately in an emergency; otherwise seek medical assistance as soon as possible.
- 15.4.1.2 Move the person to a warm, dry area.
- 15.4.1.3 Remove wet clothes and replace with dry clothes, cover the body (including the head and neck) with layers of blankets; and with a vapor barrier (e.g. tarp, garbage bag). Do **not** cover the face.
- 15.4.1.4 If medical help is more than 30 minutes away:
- 15.4.1.4.1 Give warm sweetened drinks if alert (no alcohol), to help increase the body temperature. Never try to give a drink to an unconscious person.
- 15.4.1.4.2 Place warm bottles or hot packs in armpits, sides of chest, and groin. Call 911 for additional rewarming instructions.
- 15.4.1.5 If a person is not breathing or has no pulse:
- 15.4.1.5.1 Call 911 for emergency medical assistance immediately.
- 15.4.1.5.2 Treat the worker as per instructions for hypothermia, but be very careful and do not try to give an unconscious person fluids.
- 15.4.1.5.3 Check him/her for signs of breathing and for a pulse. Check for 60 seconds.
- 15.4.1.5.4 If after 60 seconds the affected worker is not breathing and does not have a pulse, trained workers may start rescue breaths for 3 minutes.
- 15.4.1.5.5 Recheck for breathing and pulse, check for 60 seconds.
- 15.4.1.5.6 If the worker is still not breathing and has no pulse, continue rescue breathing.
- 15.4.1.5.7 Only start chest compressions per the direction of the 911 operator or emergency medical services^{*}
- 15.4.1.5.8 Reassess patient's physical status periodically.
- 15.4.1.5.9 Chest compression are recommended only if the patient will not receive medical care within 3 hours.

16 What is Frostbite?

- 16.1 Frostbite is an injury to the body that is caused by freezing of the skin and underlying tissues. The lower the temperature, the more quickly frostbite will occur.
- 16.2 Frostbite typically affects the extremities, particularly the feet and hands. Amputation may be required in severe cases.
- 16.3 What are the symptoms of frostbite?
- 16.3.1 Reddened skin develops gray/white patches.



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- 16.3.2 Numbness in the affected part.
- 16.3.3 Feels firm or hard.
- 16.3.4 Blisters may occur in the affected part, in severe cases.
- 16.4 What can be done for a person suffering from frostbite?
- 16.4.1 Follow the recommendations described above for hypothermia.
- 16.4.2 Do not rub the affected area to warm it because this action can cause more damage.
- 16.4.3 Do not apply snow/water. Do not break blisters.
- 16.4.4 Loosely cover and protect the area from contact.
- 16.4.5 Do not try to rewarm the frostbitten area before getting medical help; for example, do not place in warm water. If a frostbitten area is rewarmed and gets frozen again, more tissue damage will occur. It is safer for the frostbitten area to be rewarmed by medical professionals.
- 16.4.6 Give warm sweetened drinks, if the person is alert. Avoid drinks with alcohol.

17 What is Immersion/Trench Foot?

- 17.1 Trench Foot or immersion foot is caused by prolonged exposure to wet and cold temperatures. It can occur at temperatures as high as 60°F if the feet are constantly wet.
- 17.2 Non-freezing injury occurs because wet feet lose heat 25-times faster than dry feet.
- 17.3 To prevent heat loss, the body constricts the blood vessels to shut down circulation in the feet. The skin tissue begins to die because of a lack of oxygen and nutrients and due to the buildup of toxic products.

14 What is Immersion/Trench Foot? Continued

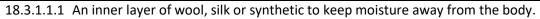
- 17.4 What are the symptoms of trench foot?
- 17.4.1 Redness of the skin, swelling, numbness, blisters.
- 17.5 What can be done for a person suffering from immersion foot?
- 17.5.1 Call 911 immediately in an emergency; otherwise seek medical assistance as soon as possible.
- 17.5.2 Remove the shoes, or boots, and wet socks.

18 Dressing Properly

- 18.1 Dressing properly is extremely important to preventing cold stress.
- 18.2 The type of fabric worn also makes a difference. Cotton loses its insulation value when it becomes wet. Wool, silk and most synthetics, on the other hand, retain their insulation even when wet.
- 18.3 The following are recommendations for working in cold environments:
- 18.3.1.1 Wear at least three layers of loose fitting clothing. Layering provides better insulation. Do not wear tight fitting clothing.



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- 18.3.1.1.2 A middle layer of wool or synthetic to provide insulation even when wet.
- 18.3.1.1.3 An outer wind and rain protection layer that allows some ventilation to prevent overheating.
- 18.3.1.2 Wear a hat or hood to help keep your whole body warmer. Hats reduce the amount of body heat that escapes from your head.
- 18.3.1.3 Use a knit mask to cover the face and mouth (if needed).
- 18.3.1.4 Use insulated gloves to protect the hands (water resistant if necessary).
- 18.3.1.5 Wear insulated and waterproof boots (or other footwear).
- 18.3.1.6 Keep a change of dry clothing available in case work clothes become wet.
- 18.3.1.7 With the exception of the wicking layer do not wear tight clothing. Loose clothing allows better ventilation of heat away from the body.

19 Safety Tips for Workers

- 19.1 Monitor your physical condition and that of your coworkers.
- 19.2 Dress properly for the cold.
- 19.3 Stay dry in the cold because moisture or dampness, e.g. from sweating, can increase the rate of heat loss from the body.
- 19.4 Keep extra clothing (including underwear) handy in case you get wet and need to change.
- 19.5 Drink warm sweetened fluids (no alcohol).
- 19.6 Use proper engineering controls, safe work practices, and personal protective equipment (PPE) provided.
- 19.7 If possible, heavy work should be scheduled during the warmer parts of the day.
- 19.8 Take breaks out of the cold.
- 19.9 Try to work in pairs to keep an eye on each other and watch for signs of cold stress.
- 19.10 Avoid fatigue since energy is needed to keep muscles warm.
- 19.11 Take frequent breaks and consume warm, high calorie food such as pasta to maintain energy reserves.



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CHAPTER 5

1 Confined Space Program

- 1.1 The program covers confined spaces to include, but are not limited to, tanks, vessels, silos, storage bins, hoppers, vaults, pits, manholes, tunnels, equipment housings, ductwork, pipelines, etc.
- 1.2 Many workplaces contain areas that are considered "confined spaces" because while they are not necessarily designed for people, they are large enough for workers to enter and perform certain jobs.
- 1.3 A confined space also has limited or restricted means for entry or exit and is not designed for continuous occupancy.
- 1.4 JDM Janitorial Inc. has developed the following policy on Confined Spaces to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, certification training.
- 2.2 Permit: Entry Permit (Required for each confined space.)
- 2.3 Cancelled Permit: (Must keep records 1 year.)
- 2.4 Communication: (RF Radio, Cell Phones, Verbal, Written)
- 2.5 Program Review: (Confined Space Entry program must be review annually.)

3 Competent Person

- 3.1 Connie Holguin is the competent person responsible for the program.
- 3.2 Prior to the start of work Connie Holguin or their competent designee will identify all confined spaces JDM Janitorial Inc. may direct employees to work.
- 3.2.1 Permit spaces will be identified by careful evaluation and consideration of the elements of the space.
- 3.3 The internal atmosphere must be tested, with a calibrated direct-reading instrument, for oxygen content, for flammable gases and vapors, and for potential toxic air contaminants.



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4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities pose a risk from confined space entry.
- 4.2 Training must be done prior to:
- 4.2.1 Assignment of duties,
- 4.2.2 Change in assignment of duties,
- 4.2.3 Workplan deviations or,
- 4.2.4 In the occurrence of new hazards.
- 4.3 Training provided by JDM Janitorial Inc. will be recorded and made available to any authorized representative or employee of JDM Janitorial Inc..
- 4.4 The training records will include at the minimum:
- 4.4.1 Employee names,
- 4.4.2 Trainer signatures,
- 4.4.3 Dates of training.

5 Signage/Barricades

- 5.1 Where there is risk from unauthorized entry into a confined space/permit confined space signage, barricades, barriers, etc. must be use.
- 5.2 Each space will be analyzed to determine the proper signage and barricades needed to protect:
- 5.2.1 The public (pedestrians, vehicles, etc.),
- 5.2.2 Entrants from external hazards and,
- 5.2.3 A method to detection hazardous conditions to ensure conditions are acceptable during the entry and the duration of the permit space.

6 Personal Protective Equipment

- 6.1 JDM Janitorial Inc. will provide and maintain the necessary PPE and any other equipment to employees whose job duties pose a risk from confined space entry.
- 6.2 Employees of JDM Janitorial Inc. are required to use the provided PPE.



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7 Detection of Hazardous Conditions

- 7.1 If hazardous conditions are detected during entry, employees must immediately leave the space.
- 7.2 JDM Janitorial Inc. will evaluate the space to determine the cause of the hazardous atmosphere and modify the program as necessary.
- 7.3 When entry to permit spaces is prohibited, JDM Janitorial Inc. will take effective measures to prevent unauthorized entry.
- 7.3.1 Non-permit confined spaces must be evaluated when changes occur in their use or configuration and, where appropriate, must be reclassified as permit spaces.
- 7.4 A space with no potential to have atmospheric hazards may be classified as a non-permit confined space only when all hazards are eliminated in accordance with the standard.
- 7.4.1 If entry is required to eliminate hazards and obtain data, JDM Janitorial Inc. will follow specific procedures in the standard.

8 Monitoring

- 8.1 It is a requirement of JDM Janitorial Inc. that an outside attendant must be on duty for the duration of the confined space operation.
- 8.2 JDM Janitorial Inc. does not allow a single attendant to monitor multiple confined spaces at one time.
- 8.3 To inform entrants of potential hazards, pre-entry testing results and continuous monitoring, JDM Janitorial Inc. requires entrants participate in the permit review and signing.
- 8.4 Testing must be done prior to entry or any work and Ventilation must be used.
- 8.5 Additional monitoring may be requested by employees or their representatives and at any time.
- 8.6 Any employee who enters the space, or that employee's authorized representative, shall be provided with an opportunity to observe the periodic testing.

9 Assigned Duties

9.1 Authorized Entrant

- 9.2 Authorized entrants are required to:
- 9.2.1 Know space hazards, including information on the means of exposure such as inhalation or dermal absorption, signs of symptoms and consequences of the exposure;
- 9.2.2 Use appropriate personal protective equipment properly;
- 9.2.3 Maintain communication with attendants as necessary to enable them to monitor the entrant's status and alert the entrant to evacuate when necessary;



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- 9.2.4 Exit from the permit space as soon as possible when:
- 9.2.4.1 Ordered by the authorized person;
- 9.2.4.2 He or she recognizes the warning signs or symptoms of exposure;
- 9.2.4.3 A prohibited condition exists; or
- 9.2.4.4 An automatic alarm is activated.
- 9.2.5 Alert the attendant when a prohibited condition exists or when warning signs or symptoms of exposure exist.

9.3 Attendant

- 9.4 The attendant is required to:
- 9.4.1 Remain outside the permit space during entry operations unless relieved by another authorized attendant;
- 9.4.2 Perform non-entry rescues when specified by the employer's rescue procedure;
- 9.4.3 Know existing and potential hazards, including information on the mode of exposure, signs or symptoms, consequences and physiological effects;
- 9.4.4 Maintain communication with and keep an accurate account of those workers entering the permit space;
- 9.4.5 Order evacuation of the permit space when:
- 9.4.5.1 A prohibited condition exists;
- 9.4.5.2 A worker shows signs of physiological effects of hazard exposure;
- 9.4.5.3 An emergency outside the confined space exists; and
- 9.4.5.4 The attendant cannot effectively and safely perform required duties.
- 9.5 Summon rescue and other services during an emergency;
- 9.6 Ensure that unauthorized people stay away from permit spaces or exit immediately if they have entered the permit space;
- 9.7 Inform authorized entrants and the entry supervisor if any unauthorized person enters the permit space; and
- 9.8 Perform no other duties that interfere with the attendant's primary duties.
- 9.9 Attendants must not monitor more than 1 confined space at a time.



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9.10 Entry Supervisor

- 9.11 Entry supervisors are required to:
- 9.11.1 Know space hazards including information on the mode of exposure, signs or symptoms and consequences;
- 9.11.2 Verify emergency plans and specified entry conditions such as permits, tests, procedures and equipment before allowing entry;
- 9.11.3 Terminate entry and cancel permits when entry operations are completed or if a new condition exists;
- 9.11.4 Verify that rescue services are available and that the means for summoning them are operable;
- 9.11.5 Take appropriate measures to remove unauthorized entrants; and
- 9.11.6 Ensure that entry operations remain consistent with the entry permit and that acceptable entry conditions are maintained.

10 Emergency/Rescue

10.1 Rescue Service Personnel

- 10.1.1 In the event of an emergency the rescue services will be provided by the host facility.
- 10.1.2 In the instance JDM Janitorial Inc. is required to provide rescue services, a designated rescue services personnel team will be selected.
- 10.1.3 JDM Janitorial Inc. will ensure that designated responders are capable of responding to an emergency in a timely manner.
- 10.1.4 JDM Janitorial Inc. will provide designated rescue service personnel "where required" to be listed on the permit, with personal protective and rescue equipment at no cost, including respirators, and training in how to use it.
- 10.2 JDM Janitorial Inc. shall provide affected employees with the personal protective equipment (PPE) needed to conduct permit space rescues safety and train affected employees so they are proficient in the use of PPE at no cost to the employee.
- 10.2.1 The designated rescue service personnel also must receive the authorized entrants training and be trained to perform assigned rescue duties.
- 10.3 At least one rescue member must hold a current certification in first aid and CPR.
- 10.4 Affected employees must practice making permit space rescues at least once every 12 months by means of simulated rescue operations in which they remove dummies, manikins, or actual persons from the actual permit spaces or from representative permit spaces.
- 10.5 Non-entry rescue retrieval systems or methods must be used whenever an authorized entrant enters a permit space, unless the retrieval equipment would increase overall risk or would not contribute to the entrant's rescue.
- 10.6 Unauthorized personnel must not attempt a rescue as this could threaten their lives.



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10.7 Harnesses/Retrieval Lines

- 10.7.1 Authorized entrants who enter a permit space must wear a chest or full body harness with a retrieval line attached to the center of their backs near shoulder level or above their heads. Wristlets may be used if the employer can demonstrate that the use of a chest or full body harness is not feasible or creates a greater hazard.
- 10.7.2 It is a requirement of JDM Janitorial Inc. that the other end of the retrieval line must be attached to a mechanical device or a fixed point outside the permit space. A mechanical device must be available to retrieve someone from vertical type permit spaces more than five feet (1.524 meters) deep.

10.8 **SDS**

10.8.1 If an injured entrant is exposed to a substance for which a Safety Data Sheet (MSDS) or other similar written information is required to be kept at the worksite, that SDS or other written information must be made available to the medical facility personnel treating the exposed entrant.

11 IDLH (Immediately Dangerous to Life and Health)

11.1 It is the policy of JDM Janitorial Inc. to have on-site emergency services when IDHL conditions exist while work is being done.

12 Entry Permit

- 12.1 Prior to entry into a confined space, it is a requirement of JDM Janitorial Inc. that an entry permit must be completed.
- 12.2 The entry permit will be the printed/written document that controls entry into a confined space.
- 12.3 A permit, signed by the entry supervisor, must be posted at all entrances or otherwise made available to entrants before they enter a permit space.
- 12.4 The permit must verify that pre-entry preparations outlined in the standard have been completed.
- 12.5 The duration of entry permits must not exceed the time required to complete an assignment.
- 12.6 JDM Janitorial Inc. shall implement the measures necessary to prevent unauthorized entry, identify and evaluate the hazards of permit spaces before employees enter them, and develop and implement the procedures necessary for safety permit space entry operations by:



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- 12.6.1 Specifying acceptable entry conditions, providing each authorized entrant the opportunity to observe any monitoring or testing, isolating the permit space, purging, inerting, flushing, or ventilating the permit space to eliminate atmospheric hazards, providing pedestrian, vehicle, or other barriers as necessary to protect entrants from external hazards, and verifying that conditions in the permit space are acceptable for entry throughout the duration of an authorized entry.
- 12.7 The company will conduct atmospheric testing of a permit required confined space prior to allowing entrants into the space. The program requires that testing be conducted using a calibrated direct reading instrument and include testing for oxygen, flammable gases or vapors, and for toxic air containments. The program also requires that testing be conducted in the order previously stated. The program must state that atmospheric testing results must be revealed to requesting affected employees or their representatives.
- 12.8 Entry permits must include:
- 12.8.1 Name of permit space to be entered, authorized entrant(s), eligible attendants and individuals authorized to be entry supervisors;
- 12.8.2 Test results;
- 12.8.3 Tester's initials or signature;
- 12.8.4 Name and signature of supervisor who authorizes entry;
- 12.8.5 Purpose of entry and known space hazards;
- 12.8.6 Measures to be taken to isolate permit spaces and to eliminate or control space hazards;
- 12.8.7 Name and telephone numbers of rescue and emergency services and means to be used to contact them;
- 12.8.8 Date and authorized duration of entry;
- 12.8.9 Acceptable entry conditions;
- 12.8.10 Communication procedures and equipment to maintain contact during entry;
- 12.8.11 Additional permits, such as for hot work, that have been issued authorizing work in the permit space;
- 12.8.12 Special equipment and procedures, including personal protective equipment and alarm systems; and
- 12.9 Any other information needed to ensure employee safety. Before entry is authorized, the employer shall prepare an entry permit.
- 12.10 The entry supervisor identified on the permit shall sign it to authorize entry.



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- 12.11 The completed permit shall be made available at the time of entry to all authorized entrants or their authorized representatives.
- 12.12 The duration of the permit may not exceed the time required to complete the assigned task or job identified on the permit.

13 Cancelled Entry Permits

- 13.1 The entry supervisor must cancel entry permits when an assignment is completed or when new conditions exist.
- 13.2 New conditions must be noted on the canceled permit and used in revising the permit space program.
- 13.3 The standard requires that all canceled entry permits be kept for at least one year.
- 13.4 The permit space program must be reviewed annually using the canceled permits and revised as necessary to ensure that employees participating in entry operations are protected from permit space hazards.

14 Multiple Contractors

- 14.1 When work is being performed by more than one contractor JDM Janitorial Inc. will obtain any available information regarding permit space hazards and entry operations from the host contractor.
- 14.2 JDM Janitorial Inc. will coordinate entry operations with the host contractor, when both host contractor personnel and contractor personnel will be working in or near permit spaces.
- 14.3 JDM Janitorial Inc. will inform the host employer of the permit space program that the contractor will follow and of any hazards confronted or created in permit spaces, either through a debriefing or during the entry operation.



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15 Alternative to a Full Permit Entry

15.1 Under certain conditions described in the standard, the employer may use alternate procedures for worker entry into a permit space. For example, if an employer can demonstrate with monitoring and inspection data that the only hazard is an actual or potential hazardous atmosphere that can be made safe for entry using continuous forced air ventilation, the employer may be exempted from some requirements, such as permits and attendants. However, even in these circumstances, the employer must test the internal atmosphere of the space for oxygen content, flammable gases and vapors, and the potential for toxic air contaminants before any employee enters it. The employer must also provide continuous ventilation and verify that the required measurements are performed before entry.

16 Permit-Required Confined Space Decision Flow Chart

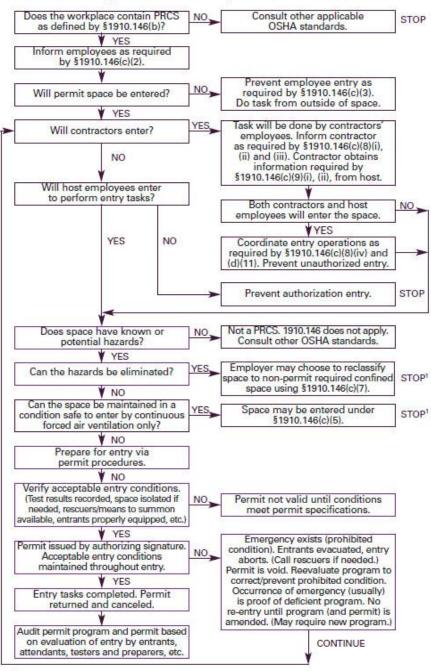
16.1 See next page.



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Permit-Required Confined Space Decision Flow Chart



¹ Spaces may have to be evacuated and reevaluated if hazards arise during entry.

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Source: 29 CFR 1910.146 Appendix A.



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17 Confined Space Entry Permit

Confined Space Entry Permit Number						
Site Location or Description:						
Purpose of Entry:						
Supervisor(s) in charge of Crew:	Ph	one Numb	er	Type of Crew Phone	e Number	
Permit Date	Pe	rmit Durati	ion			
Communication Procedures (Including E	Equipment)	:				
Rescue Procedures (Also see emergence	y contact pl	hone numb	ers at end	d of form)		
REQUIREMENTS COMPLETED		Date	Time	REQUIREMENTS COMPLETED	Date	Time
(Put N/A if item does not apply)				(Put N/A if item does not apply)		
Lockout/De-energize/Try-out	ockout/De-energize/Try-out Supplied Air Respirator (N/A if alternate entry)					
Line(s)Broken-Capped-Blank		Respirators (Air Purifying)				
Purge-Flush and Vent	Protective Clothing					
Ventilation		Full Body Harness w/" D" ring				
Secure Area (post and Flag)				Emergency Escape Retrieval Equipment		
Lighting (explosive proof)				Lifelines		
Hotwork Permit				Standby safety personnel (N/A if alternate		
				entry)		
Fire Extinguishers				Resuscitator – Inhalator (N/A if alternate entry)		
Confined Space Entry Permit (Continued	(b					
Air Monitoring						
Substance Monitored	Permissik	ole Levels		Monitoring Results		



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Time monitored (put time)	Record t	he time									
Percent Oxygen	19.5% to	19.5% to 23.5%									
LEL/LFL	Under10)%									
Toxic 1:	P	PEL	STEL								
			-								
Toxic 2:	P	PEL	_STEL								
Toxic 3:	P	PEL	_STEL								
Toxic 4:	P	PEL	_STEL								
Remarks:	I	1	I	1	1			1	1	1	L
Air Tester Name	ID#	Instrument(s) Used (for ex	ample:		Model	# or Typ	be	Seria	al # or Ur	nit
		oxygen mete		e gas							
		indicator, etc	2.)								
Attendants and Entrants											
Attendant(s)			ID#	Confin	ed Spac	e Entra	nts		ID#		
					·						
Required for all confined space wo	ork except alteri	nate entry)									
Remarks:											
Supervisor Authorization – All con	ditions Satisfied	l Department	t or Phone Nu	Imber							
Emergency Contact Phone Numbe	ers: Amb	ulance:			Fire:						
Safety:	Rescu	ue Team:			Other	r:					



Disciplinary Program	Reference: Client Requirement	
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CHAPTER 6

1 Disciplinary Program

- 1.1 The program covers the disciplinary policy for violations of safety rules.
- 1.2 JDM Janitorial Inc. has developed the following policy on Disciplinary to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

2.1 Training: Safety Meetings

3 Competent Person

- 3.1 Connie Holguin is the competent person responsible for the program.
- 3.2 It is the responsibility of supervisors to ensure safety rules are taught and implemented.

4 Safety Violations

- 4.1 It is a requirement of JDM Janitorial Inc. that all employees must follow all safety rules and policy.
- 4.1.1 Failure to follow safety rules and policy will result in a safety violation and/or termination depending on the violation.
- 4.2 Safety violations include:
- 4.2.1 Failure to wear personal protective equipment (PPE),
- 4.2.2 Not following verbal commands,
- 4.2.3 Not following written policy,
- 4.2.4 Horseplay and,
- 4.2.5 Substance abuse.
- 4.3 All safety violations are subject to the following:
- 4.3.1 Verbal warning,
- 4.3.2 Written warning,
- 4.3.3 Suspension without pay or,
- 4.3.4 Termination.
- 5 Inspections
- 5.1 Physical inspections will take place during the job safety analysis and as needed per job need to ensure compliance with safety rules and policies.



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Disciplinary Program	Reference: Client Requir	ement	
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Safety Violation Form

Employee Name:	
Time & Date of Violati	on:
Jobsite Location:	
Type of Violation:	
Result of Violation:	
Disciplinary Action:	
	, have read/been read and understand the safety rules of this company. I agree to act in afety rules always while working, and understand that the violation of any rule is cause for stern disciplinary action, rmination of employment.
Employee Signature:	Date:
Supervisor Signature:	Date:

File in employee's personal file, with copy given to employee.

Copy of violation must be sent to Connie Holguin.



Driving Safety	Reference: 29 CFR 1926.601	
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CHAPTER 7

1 Driving Safety Program

- 1.1 JDM Janitorial Inc. has developed the following policy on Driving Safety to ensure the safety of our employees and comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.
- 1.2 Roughly 475,000 large trucks with a gross vehicle weight rating of more than 10,000 pounds are involved in crashes which result in approximately 5,360 fatalities and 142,000 injuries each year. Of the fatalities, about 74 percent were occupants of other vehicles (usually passenger cars), 3 percent were pedestrians, and 23 percent were occupants of large trucks. The unsafe actions of automobile drivers are a contributing factor in about 70 percent of the fatal crashes involving trucks. More public awareness of how to share the road safely with large trucks is needed. <u>Safe speeds save lives</u>. <u>Exceeding the speed limit was a factor in 22 percent of the fatal crashes</u>.

2 Implementation

- 2.1 Training: Safety Meetings, DOT if required.
- 2.2 PPE: Safety Vests, Hard Hats, Work Gloves & Boots.
- 2.3 Driver Logs if required.
- 2.4 Vehicle Inspection Form

3 Company Vehicle Operators

- 3.1 It is a requirement of JDM Janitorial Inc. that only authorized employees may drive/operate company vehicles.
- 3.2 Authorized means the employees has a valid and current license to operate the vehicle.
- 3.2.1 All authorized drivers will be trained and assessed.
- 3.3 The drivers must obey all traffic laws including possessing a valid driver's license, speed limits, signaling when changing lanes, obeying traffic lights, etc.

4 Substance Abuse

- 4.1 No driver of JDM Janitorial Inc. is allowed to operate vehicles while under the influence of any substance or medication that may impair their driving ability.
- 4.2 Examples of substances are:
- 4.2.1 Alcohol,
- 4.2.2 Illegal drugs,
- 4.2.3 Prescription or over the counter medications, etc.



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5 JDM Janitorial Inc.'s Safe Driving Practices

5.1 Stay Safe

- 5.1.1 Must use a seat belt at all times while in motion driver and passenger(s).
- 5.1.2 Be well-rested before driving.
- 5.1.3 Avoid taking medications that make you drowsy.
- 5.1.4 Set a realistic goal for the number of miles that you can drive safely each day.
- 5.1.5 If you are impaired by alcohol or any drug, do not drive.

5.2 Stay Focused

- 5.2.1 Driving requires your full attention. Avoid distractions, such as adjusting the radio or other controls, eating or drinking, and talking on the phone.
- 5.2.2 Continually search the roadway to be alert to situations requiring quick action.
- 5.2.3 Stop about every two hours for a break. Get out of the vehicle to stretch, take a walk, and get refreshed.

5.3 Avoid Aggressive Driving

- 5.3.1 Keep your cool in traffic!
- 5.3.2 Be patient and courteous to other drivers.
- 5.3.3 Do not take other drivers' actions personally.
- 5.3.4 Reduce your stress by planning your route ahead of time (bring the maps and directions), allowing plenty of travel time, and avoiding crowded roadways and busy driving times.

6 Vehicles

- 6.1 It is a requirement of JDM Janitorial Inc. that vehicles are used for their intended use.
- 6.2 All company vehicles of JDM Janitorial Inc. will be regularly maintained to ensure safe working order.
- 6.3 In the instance of unsafe working order, the vehicle will be removed from service until deemed to be in safe working order again.
- 6.4 Vehicles will be monitored via GPS.
- 6.5 Drivers will communicate with JDM Janitorial Inc. via cell phone, client phones.



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6 Vehicles Continued

- 6.6 Vehicles used to transport employees must have seats firmly secured and adequate for the number of employees to be carried.
- 6.7 Seat belts and anchorages meeting the requirements of 49 CFR Part 571 (Department of Transportation, Federal Motor Vehicle Safety Standards) shall be installed in all motor vehicles.
- 6.8 All vehicles in use shall be checked at the beginning of each shift to assure that the following parts, equipment, and accessories are in safe operating condition and free of apparent damage that could cause failure while in use:
- 6.8.1 Service brakes, including trailer brake connections; parking system (hand brake); emergency stopping system (brakes),
- 6.8.2 Tires,
- 6.8.3 Horn,
- 6.8.4 Steering mechanism,
- 6.8.5 Coupling devices,
- 6.8.6 Seat belts,
- 6.8.7 Operating controls, and
- 6.8.8 Safety devices.
- 6.9 All defects must be corrected before the vehicle is placed in service. These requirements also apply to equipment such as lights, reflectors, windshield wipers, defrosters, fire extinguishers, etc., where such equipment is necessary.

7 Load/Limits

- 7.1 It is the policy of JDM Janitorial Inc. to follow the manufacturer's specifications and legal limits for the vehicle.
- 7.2 All loads must be secured prior to putting the vehicle into motion.
- 7.3 Tools and material must be secured to prevent movement when transported in the same compartment with employees.

8 Traffic Violation/Collision Reporting

- 8.1 It is a requirement of JDM Janitorial Inc. that authorized drivers must report and collisions or traffic violations to Connie Holguin.
- 8.1.1 Failure to do so could result in termination.



Driving Safety	Reference: 29 CFR 1926.601	
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9 Driver Qualification

- 9.1 JDM Janitorial Inc. will check the driving history of all applicants through the use of a Motor Vehicle Record (MVR) before they are granted driving privileges and obtain an updated MVR for all approved drivers and annually thereafter.
- 9.2 MVRs will also be checked whenever an employee is involved in a motor vehicle accident.
- 9.3 A driver list is maintained and updated annually, including the last date of an MVR for each driver.
- 9.4 The approved drivers list will be recorded on the proper form and maintained by the Program Administrator.
- 9.5 Employees will be prohibited from operating vehicles on company business under any of the following conditions:
- 9.5.1 Employee does not have a valid driver's license, or the license has been suspended or revoked.
- 9.5.2 Employee does not have at least one year of verifiable driving experience.
- 9.5.3 Employee's MVR indicates more than two at-fault accidents, three moving violations, or two moving violations and one at-fault accident in the past three years.
- 9.5.4 Employee's MVR indicates any one of the following major violations within the past five years:
- 9.5.4.1 Driving under the influence,
- 9.5.4.2 Reckless driving/speed contests,
- 9.5.4.3 Hit and run,
- 9.5.4.4 Vehicular manslaughter/homicide,
- 9.5.4.5 Leaving the scene of an accident,
- 9.5.4.6 Fleeing/eluding a police officer,
- 9.5.4.7 Passing a stopped school bus,
- 9.5.4.8 Speeding 15 or more miles over the speed limit,
- 9.5.4.9 Refusing a chemical test,
- 9.5.4.10 Operating with a suspended or revoked license.
- 9.5.5 Employee has tested positive in an alcohol or drug test while in our employment.

10 Communication

- 10.1 The use of handheld or hands-free cell phones, or other devices that take attention away from the driving task, are prohibited by those driving company vehicles.
- 10.2 Passengers may use devices only if the use will not be distracting to the driver. Cell phone calls should be made prior to or at the completion of a trip.
- 10.3 If a call must be made during a trip, drivers must pull into a safe location and stop before making the call.

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JDM Janitorial Inc.

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10.4 If the driver receives an incoming call while driving, they must allow the call to go to voicemail and return the call when stopped in a safe location.

- 10.5 Eating while driving is prohibited.
- 10.6 Non-alcoholic drinks may be consumed with great discretion and only in situations where driving hazards (i.e., traffic, road construction, etc.) are minimal.



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11 Vehicle Inspection Form

Vehicle Plate or ID number					
Authorized Driver Name:					
Inspected Items	Pass	Fail	Inspected Items	Pass	Fail
Service Brakes			Operating Controls		
Trailer Brake Connections			Safety Devices		
Parking Brake/Emergency Brake					
Tires					
Horn					
Steering Mechanism					
Coupling Devises					
Seat Belts					
Signature:			Date:		



Emergency Action Plan	Reference: 29 CFR 1926.35	
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CHAPTER 8

1 Emergency Action Plan Program

1.1 JDM Janitorial Inc. has developed the following policy on Emergency Action Plan to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, practice drills.
- 2.2 PPE: Safety vests, hard hats, work boots.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees in the safe procedures of the Emergency Action Plan.
- 4.2 Connie Holguin will train employees to assist in a safe and orderly evacuation of other employees.

5 Emergency Action Plan

- 5.1 Although JDM Janitorial Inc. takes precautions to prevent them, emergencies do occur.
- 5.2 This plan is available for employees to review by contacting the designated safety coordinator, the phone number is listed in the header of each policy.
- 5.3 Employees have been informed of the company's planned response to emergency situations, and they are expected to adhere to these guidelines for the duration of this project.
- 5.4 The elements of this plan are as follows:
- 5.4.1 Emergency evacuation plan,
- 5.4.2 Critical operations,
- 5.4.3 Methods to account for JDM Janitorial Inc. employees,
- 5.4.4 Rescue and medical duties
- 5.4.5 Means of reporting emergencies,
- 5.4.6 Company representative(s) responsible for plan.



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6 Emergency Evacuation Plan

- 6.1 On a typical above ground project, JDM Janitorial Inc. will prepare an emergency evacuation plan for two areas: The roof and ground.
- 6.1.1 Roof evacuation procedures are as follows:
- 6.1.2 Ground evacuation procedures are as follows:

7 Critical Operations

7.1 If any emergency occurs on a project involving propane, combustion engine equipment or electrical tools, JDM Janitorial Inc. employees will shut off propane sources at the cylinders and turn off all equipment before evacuating, provided employee safety is not jeopardized by doing so.

Yes _____

Yes _____

Yes _____

No _____ No _____

No _____ No _____

7.1.1 Does this project involve the use of propane?

7.1.2 Does this project involve the use of combustion engine equipment?

7.1.3 Does this project involve the use of electrical tools or other ignition sources? Yes _____

7.1.4 Does this project involve the use of other critical operations not listed?

- 7.1.5 Explain:
- 7.2 If our employees are not able to shut off propane supplies, the fire department or other responding emergency agency will be notified of the presence and locations of the propane tanks.
- 7.2.1 List locations of propane on this site:



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8 Methods to Account for Employees

- 8.1 Employees have been instructed to meet at a designated location so that they can be accounted for on the project. If it is determined that any employees are missing, the responding emergency agency will be notified. The agency also will be informed about the last approximate whereabouts of missing employees.
- 8.2 The meeting location will be chosen based on the type of emergency involved. The project manager will account for wind direction and potential hazards in determining the meeting place.
- 8.3 The meeting location for this project will be:

9 Rescue and Medical Duties

- 9.1 This crew has been specifically trained to rescue and/or attend to injured employees. Yes _____ No _____
- 9.1.1 If "No" has been checked, our employees will rely on paramedics or other emergency rescue teams.
- 9.1.2 If "Yes" has been checked, those employees trained in rescue operations will perform duties according to the training they have received. The remaining employees will meet at the designated meeting area.

10 Means of Reporting Emergencies

- 10.1 When a fire or emergency occurs, it is our intention to notify all employees, affected contractors, building owners and homeowners about the crisis.
- 10.2 The first call will be made to the local fire department by using 911. If 911 is unavailable in the job's area or there is an on-site fire department, such as on military installations, that emergency telephone number will be used instead. Emergency telephone numbers are included in this plan.
- 10.3 If there are 10 employees or fewer in the area, a human voice will be used to notify those on the job. For projects involving more than 10 employees, airhorns or similar equipment will be used.

11 Company Representative(s) Responsible for Plan

- 11.1 Connie Holguin is the responsible person to contact with any questions regarding this plan.
- 11.2 If additional information is needed, the project manager should be contacted.



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12 Emergency Contacts List

Project Address	
Project Telephone	
Home Office Telephone	
Local Police Telephone	
Local Fire Telephone	
Local Paramedics Telephone	
Local Hospital Address	
Local Hospital Telephone	

13 Nearest Hospital Directions

13.1 Use the space below to draw directions to the nearest hospital. Be sure to include the north arrow.



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14 Evacuation Routes & Exits

14.1 Use the space below to draw your evacuation routes and exits. Be sure to include the north arrow.



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15 Alarm System

- 15.1 It is a requirement of JDM Janitorial Inc. to have and maintain an employee alarm system.
- 15.2 The employee alarm system will use a distinctive signal for each purpose and comply with the requirements in § 1910.165.

16 Program Review

- 16.1 The Emergency Action Plan will be reviewed with employees under the following circumstances:
- 16.1.1 The plan is developed,
- 16.1.2 The employee is initially assigned to a job,
- 16.1.3 The employee's responsibilities under the plan change and,
- 16.1.4 The plan is changed.



Fall Protection	Reference: 29 CFR 1926.501;502;503	
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CHAPTER 9

1 Fall Protection Program

- 1.1 Falls are among the most common causes of serious work-related injuries and deaths. It is important to set up the work place to prevent employees from falling off of overhead platforms, elevated work stations or into holes in the floor and walls.
- 1.2 JDM Janitorial Inc. has developed the following policy on Fall Protection to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.
- **1.3** Fall Protection is required when employees work at heights of six feet or greater in construction and four feet or greater in general industry.

2 Implementation

- 2.1 Training: Safety meeting, Certification training.
- 2.2 PPE: Safety vests, Harnesses, Lanyards, Work boots, Hard hats

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program, to monitor the safety of other employees and to ensure that the safety monitors comply with the fall protection plan. Connie Holguin is the qualified person, through certification training, to prepare the fall protection plan.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the risk of falling hazards.
- 4.2 This training will enable employees of JDM Janitorial Inc. to recognize the hazards of falling and the procedures to follow to prevent or minimize these hazards.
- 4.3 Each employee will be trained, as necessary, by a competent person qualified in the following areas:
- 4.3.1 The nature of fall hazards in the work area;
- 4.3.2 The correct procedures for erecting, maintaining, disassembling, and inspecting the fall protection systems to be used;
- 4.3.3 The use and operation of guardrail systems, personal fall arrest systems, safety net systems, warning line systems, safety monitoring systems, controlled access zones, and other protection to be used;
- 4.3.4 The role of each employee in the safety monitoring system when this system is used;



Fall Protection	Reference: 29 CFR 1926.501;502;503	
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- 4.3.5 The limitations on the use of mechanical equipment during the performance of roofing work on low-sloped roofs;
- 4.3.6 The correct procedures for the handling and storage of equipment and materials and the erection of overhead protection; and
- 4.3.7 The role of employees in fall protection plans
- 4.4 The conducted training must be documented and retained.
- 4.5 Documentation includes, at a minimum, the participants, dates of training, and signatures of the instructors conducting the training.

5 Certification of Training

- 5.1 JDM Janitorial Inc. will keep a written certification record that will contain the name or other identity of the employee trained, the date(s) of the training, and the signature of the person who conducted the training or the signature of the Connie Holguin.
- 5.1.1 The latest training certification will be maintained.

6 Retraining

- 6.1 Where JDM Janitorial Inc. has reason to believe that any affected employee who has already been trained does not have the understanding and skill required by this policy, the employee will be retrained.
- 6.2 Circumstances where retraining is required include, but are not limited to, situations where:
- 6.2.1 Changes in the workplace render previous training obsolete,
- 6.2.2 Changes in the types of fall protection systems or equipment to be used render previous training obsolete,
- 6.2.3 Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicate that the employee has not retained the requisite understanding or skill.

7 Fall Protection Requirements

- 7.1 JDM Janitorial Inc. will determine if the walking/working surfaces on which our employees are to work have the strength and structural integrity to support employees safely.
- 7.1.1 Employees are only allowed to work on those surfaces only when they have the requisite strength and structural integrity.



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7. Fall Protection Requirements Continued

- 7.2 It is a requirement of JDM Janitorial Inc. that each employee on a walking/working surface which is 6 feet (1.8 m) or more above a lower level will be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.
- 7.3 Fall Protection is required when:
- 7.3.1 "Unprotected sides and edges." With an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level
- 7.3.2 Constructing a leading edge 6 feet (1.8 m) or more above lower levels.
- 7.3.2.1 Exception: If JDM Janitorial Inc. can demonstrate that it is infeasible or creates a greater hazard to use these systems, Connie Holguin will develop and implement a fall protection plan which meets the requirements with less hazard.
- 7.3.3 Where leading edges are under construction, but who is not engaged in the leading edge work.
- 7.3.4 Hazard from falling through holes (including skylights).
- 7.3.5 Hazard from tripping in or stepping into or through holes (including skylights) by covers.
- 7.3.6 Hazard from objects falling through holes (including skylights) by covers.
- 7.3.7 Hazards from ramps, runways, and other walkways.

8 Incident Investigation

- 8.1 It is a requirement of JDM Janitorial Inc. that incidents involving falls are investigated.
- 8.2 Incident investigations are important to help prevent reoccurrence, plan for potential updates to practices, procedures and training.

9 Site Specific Fall Protection Plan

9.1 In the instance, the job warrants a site specific Fall Protection plan, the plan will be developed by a qualified person designated by Connie Holguin.

10 Fall Protection Equipment

- 10.1 Only Fall Protection equipment that meets the regulations of 1926.502(d) or ANSI Z 359.1 will be used by employees of JDM Janitorial Inc..
- 10.2 Personal fall arrest systems and their use must comply with the provisions set forth below. Effective January 1, 1998, body belts are not acceptable as part of a personal fall arrest system. Note: The use of a body belt in a positioning device system is acceptable and is regulated
- 10.3 Dee-rings and snaphooks must have a minimum tensile strength of 5,000 pounds (22.2 kN).



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- 10.4 Dee-rings and snaphooks must be proof-tested to a minimum tensile load of 3,600 pounds (16 kN) without cracking, breaking, or taking permanent deformation.
- 10.5 Snaphooks must be sized to be compatible with the member to which they are connected to prevent unintentional disengagement of the snaphook by depression of the snaphook keeper by the connected member, or must be a locking type snaphook designed and used to prevent disengagement of the snaphook by the contact of the snaphook keeper by the connected member. Effective January 1, 1998, only locking type snaphooks must be used.
- 10.6 Horizontal lifelines must be designed, installed, and used, under the supervision of a qualified person, as part of a complete personal fall arrest system, which maintains a safety factor of at least two.
- 10.7 Lanyards and vertical lifelines must have a minimum breaking strength of 5,000 pounds (22.2 kN).
- 10.8 Ropes and straps (webbing) used in lanyards, lifelines, and strength components of body belts and body harnesses must be made from synthetic fibers.
- 10.9 Anchorages used for attachment of personal fall arrest equipment must be independent of any anchorage being used to support or suspend platforms and capable of supporting at least 5,000 pounds (22.2 kN) per employee attached.
- 10.10 Personal fall arrest systems and components subjected to impact loading must be immediately removed from service and must not be used again for employee protection until inspected and determined by a competent person to be undamaged and suitable for reuse.
- 10.11 JDM Janitorial Inc. will provide for prompt rescue of employees in the event of a fall or will assure that employees are able to rescue themselves.
- 10.12 Personal fall arrest systems must be inspected prior to each use for wear, damage and other deterioration, and defective components must be removed from service.
- 10.13 Personal fall arrest systems must not be attached to guardrail systems.

11 Safety Monitoring System

- 11.1 It is the policy of JDM Janitorial Inc. that a competent person must be assigned to:
- 11.2 The safety monitor shall be competent to recognize fall hazards;
- 11.3 The safety monitor shall warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner;
- 11.4 The safety monitor shall be on the same walking/working surface and within visual sighting distance of the employee being monitored;
- 11.5 The safety monitor shall be close enough to communicate orally with the employee; and;



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- 11.6 The safety monitor shall not have other responsibilities which could take the monitor's attention from the monitoring function.
- 11.7 Mechanical equipment must not be used or stored in areas where safety monitoring systems are being used to monitor employees engaged in roofing operations on low-slope roofs.
- 11.8 No employee, other than an employee engaged in roofing work [on low-sloped roofs] or an employee covered by a fall protection plan, shall be allowed in an area where an employee is being protected by a safety monitoring system.
- 11.9 Each employee working in a controlled access zone shall be directed to comply promptly with fall hazard warnings from safety monitors.
- 11.10 Where other methods of fall protection are not utilized, those areas must be designated as controlled access zones and a safety monitoring system used.

12 Incident Investigation

- 12.1 In the event an employee falls, or some other related, serious incident occurs, an investigate investigation must take place to determine if the fall protection plan needs to be changed.
- 12.2 Changes made must be implemented to prevent similar types of incidents.



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Fatigue Management	Reference: www.OSHA.gov	
Safety Coordinator	Connie Holguin	
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CHAPTER 10

1 Fatigue Management Program

- 1.1 Long work hours and irregular work shifts are common in our society. Nearly one-quarter of American workers spend over 40 hours a week at work and almost 15 million work full time on evening, night, rotating or other irregular shifts. Work schedules like these may cause worker fatigue.
- 1.2 Fatigue refers to mental or physical exhaustion that reduces work efficiency. It is more than simply feeling drowsy or tired.
- 1.3 Fatigue is caused by prolonged periods of physical and or mental exertion without enough time to rest.
- 1.4 JDM Janitorial Inc. has developed the following policy on Fatigue Management to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, hard hats, work boots, work gloves, eye & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees initially and annually thereafter.
- 4.2 The training will cover:
- 4.2.1 How to recognize fatigue,
- 4.2.2 How to control fatigue through appropriate work and personal habits and
- 4.2.3 Reporting of fatigue to supervision.



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5 Work Hour Limitations

- 5.1 In an effort to control employee turnover and absenteeism JDM Janitorial Inc. has set work hour limitations and will control job rotation schedules to:
- 5.1.1 Control fatigue,
- 5.1.2 Allow for sufficient sleep and
- 5.1.3 Increase mental fitness.

6 Ergonomic Equipment

- 6.1 In an effort to improve workstation conditions ergonomic equipment will be used, such as:
- 6.1.1 Anti-fatigue mats for standing,
- 6.1.2 Lift assist devices for repetitive lifting,
- 6.1.3 Proper lighting and control of temperature and
- 6.1.4 Other ergonomic devices as deemed appropriate.

7 Work Task Analysis

- 7.1 The Risk Assessment procedure will be used to analyze work tasks to control fatigue.
- 7.2 Work tasks will be evaluated periodically to ensure efficiency.

8 Rest Breaks

- 8.1 Rest breaks for employees will be provided to control fatigue and increase mental fitness.
- 8.2 Chairs will be available for workers to sit periodically.

9 Fatigue Reporting

- 9.1 It is a requirement of JDM Janitorial Inc. that employees must report fatigue or tiredness to their immediate supervisor.
- 9.2 Employees in safety critical positions must report fatigue or tiredness and lack of mental acuity to supervision; as well as supervisory personnel to make safety critical decisions and take appropriate actions to prevent loss.



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10 Prescription/Over the Counter Drugs

- 10.1 It is a requirement of JDM Janitorial Inc. that employees must not chronically use over-the-counter or prescription drugs to increase mental alertness.
- 10.2 Employees are discouraged from taking any substance known to increase fatigue in that employee, including fatigue that sets in after the effects of the drug wear off.

11 Program Review

11.1 The Fatigue Management program should undergo periodic assessments of its effectiveness and a continuous improvement plan created to close any gaps.



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Fire Protection /	Reference: 29 CFR 1926.150	•
Extinguishers		
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CHAPTER 11

1 Fire Protection / Extinguishers Program

- 1.1 The potential for fire can occur from many different sources such as: heat-producing equipment, storage of flammable chemicals, and faulty electrical wiring.
- 1.2 JDM Janitorial Inc. has developed the following policy on Fire Protection to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Extinguisher training (PASS)
- 2.2 PPE: Safety vests, Fire extinguishers, Small hose lines.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 JDM Janitorial Inc. shall provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved in incipient stage fire fighting.
- 4.2 Training will be provided by JDM Janitorial Inc. upon initial assignment and annually thereafter for employees whose job activities involve the use of Fire Extinguishers.
- 4.3 The training will cover the general principles of fire extinguisher use (PASS) and the hazards involved in incipient stage firefighting.
- 4.3.1 (P) Pull the pin in the handle.
- 4.3.2 (A) Aim low at the base of the flames.
- 4.3.3 (S) Squeeze the handle.
- 4.3.4 (S) Sweep side to side.
- 4.4 Retraining will be held annually.

5 Firefighting Equipment

- 5.1 There will be no delay in providing the necessary firefighting equipment as a fire hazard could occur.
- 5.2 Access to all available firefighting equipment must be maintained at all times.
- 5.3 All firefighting equipment, provided by the employer, must be conspicuously located.



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- 5.4 All firefighting equipment must be periodically inspected and maintained in operating condition. Defective equipment must be immediately replaced.
- 5.5 As warranted by the project, our company will provide a trained and equipped firefighting organization (Fire Brigade) to assure adequate protection to life.

6 Water supply

- 6.1 A temporary or permanent water supply, of sufficient volume, duration, and pressure, required to properly operate the firefighting equipment must be made available as soon as combustible materials accumulate.
- 6.2 Where underground water mains are to be provided, they must be installed, completed, and made available for use as soon as practicable.

7 Portable Firefighting Equipment

- 7.1 Portable fire extinguishers shall be provided for employee use and selected and distributed based on the classes of anticipated workplace fires and on the size and degree of hazard which would affect their use.
- 7.2 A fire extinguisher, rated not less than 2A, must be provided for each 3,000 square feet of the protected building area, or major fraction thereof. Travel distance from any point of the protected area to the nearest fire extinguisher must not exceed 100 feet.
- 7.3 One 55-gallon open drum of water with two fire pails may be substituted for a fire extinguisher having a 2A rating.
- 7.4 A 1/2-inch diameter garden-type hose line, not to exceed 100 feet in length and equipped with a nozzle, may be substituted for a 2A-rated fire extinguisher, providing it is capable of discharging a minimum of 5 gallons per minute with a minimum hose stream range of 30 feet horizontally. The garden-type hose lines must be mounted on conventional racks or reels. The number and location of hose racks or reels must be such that at least one hose stream can be applied to all points in the area.
- 7.5 One or more fire extinguishers, rated not less than 2A, must be provided on each floor. In multistory buildings, at least one fire extinguisher must be located adjacent to stairway.
- 7.6 Extinguishers and water drums, subject to freezing, must be protected from freezing.

7. Portable Firefighting Equipment

7.7 A fire extinguisher, rated not less than 10B, must be provided within 50 feet of wherever more than 5 gallons of flammable or combustible liquids or 5 pounds of flammable gas are being used on the jobsite. This requirement does not apply to the integral fuel tanks of motor vehicles.



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- 7.8 Carbon tetrachloride and other toxic vaporizing liquid fire extinguishers are prohibited.
- 7.9 Portable fire extinguishers must be inspected visually monthly and an annual maintained check in accordance with Maintenance and Use of Portable Fire Extinguishers, NFPA No. 10A-1970.
- 7.10 Fire extinguishers which have been listed or approved by a nationally recognized testing laboratory, must be used to meet the requirements in this policy.

8 Inspections

- 8.1 Portable fire extinguishers are subjected to monthly vision check and an annual maintenance check.
- 8.2 The annual maintenance date will be recorded and retained for 1 year after the last entry of life of the shell, whichever is less.

JDM Janitorial Inc. Fire Protection / Extinguishers Safety Coordinator Phone Number (682) 404-7711 Revision Date

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	First Aid	Reference: 29 CFR 1910.	226, 1926.50	
ļ	Safety Coordinator	Connie Holguin		
	Phone Number	(682) 404-7711		CMS
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CHAPTER 12

1 First Aid Program

- 1.1 First aid refers to medical attention that is usually administered immediately after the injury occurs and at the location where it occurred. It often consists of a one-time, short-term treatment and requires little technology or training to administer.
- 1.2 First aid can include cleaning minor cuts, scrapes, or scratches; treating a minor burn; applying bandages and dressings; the use of non-prescription medicine; draining blisters; removing debris from the eyes; massage; and drinking fluids to relieve heat stress.
- 1.3 OSHA's revised recordkeeping rule, which went into effect January 1, 2002, does not require first aid cases to be documented. For example:
- 1.3.1 A worker goes to the first-aid room and has a dressing applied to a minor cut by a registered nurse. Although the registered nurse is a health care professional, the employer does not have to report the accident because the worker simply received first aid.
- 1.4 JDM Janitorial Inc. has developed the following policy on First Aid to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, First aid training (American Red Cross or equivalent).
- 2.2 PPE: Safety vests, first aid kit (based on job size).

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Certification training will be provided by JDM Janitorial Inc. for employees deemed to be first aid responders.
- 4.1.1 The certification training must be obtained through the American red Cross or equivalent that can be verified by documentary evidence.

5 First Aid Responders

- 5.1 It is the policy of JDM Janitorial Inc. to have a designated staff member on shift that is adequately trained to render first aid. In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees.
- 5.2 JDM Janitorial Inc. will ensure that adequate first aid supplies are readily available.



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- 5.2.1 First aid supplies will be easily accessible when required
- 5.3 Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided within the work area for immediate emergency use.

6 First Aid Kits

- 6.1 JDM Janitorial Inc. will provide first-aid kits at each work site and on each employee transport vehicle. The number of first-aid kits and the content of each kit must reflect the degree of isolation, the number of employees, and the hazards reasonably anticipated at the work site.
- 6.2 First aid kits must be placed in a weatherproof container with individual sealed packages of each type of item and must be checked before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced.
- 6.3 The following list sets forth the minimally acceptable number and type of first-aid supplies for firstaid kits. The contents of the first-aid kit listed should be adequate for small work sites, consisting of approximately two to three employees.
- 6.3.1 When larger operations or multiple operations are being conducted at the same location, additional first-aid kits should be provided at the work site or additional quantities of supplies should be included in the first-aid kits:
- 6.3.2 Gauze pads (at least 4 x 4 inches).
- 6.3.3 Two large gauze pads (at least 8 x 10 inches).
- 6.3.4 Box adhesive bandages (band-aids).
- 6.3.5 One package gauze roller bandage at least 2 inches wide.
- 6.3.6 Two triangular bandages.
- 6.3.7 Wound cleaning agent such as sealed moistened towelettes.
- 6.3.8 Scissors.
- 6.3.9 At least one blanket.
- 6.3.10 Tweezers.
- 6.3.11 Adhesive tape.
- 6.3.12 Latex gloves.
- 6.3.13 Resuscitation equipment such as resuscitation bag, airway, or pocket mask.
- 6.3.14 Two elastic wraps.
- 6.3.15 Splint.
- 6.3.16 Directions for requesting emergency assistance.



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- 6.4 First aid kits used by JDM Janitorial Inc. will contain the proper items which are adequate for the environment where they are used.
- 6.5 For construction operations, individual sealed packages of each item must be stored in a weather proof container.
- 6.6 It is a requirement of JDM Janitorial Inc. that the first aid kits will be checked before being sent out on each job and,
- 6.6.1 At least weekly on each job to ensure that the expended items are replaced.
- 6.7 JDM Janitorial Inc. will reassess the demand for supplies and adjust their inventories quarterly or as needed.

7 Transportation

- 7.1 In the event of an incident, proper equipment will be provided for the prompt transport of the injured person to a hospital or physician.
- 7.2 A communication system for contacting 911 (ambulance services) will be provided.
- 7.3 In areas where 911 is not available, the telephone numbers of the physicians, hospitals, or ambulances will be conspicuously posted by Connie Holguin.
- 7.4 Drenching/Flushing Facilities
- 7.5 Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities will be provided within the work area for drenching and flushing.



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Fit for Duty	Reference: www.OSHA.gov	
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CHAPTER 13

1 Fit for Duty Program

- 1.1 Workers can experience high levels of stress and their daily tasks may expose them to many hazards. They may develop heat stress while wearing protective equipment or working under temperature extremes, or face life-threatening emergencies such as explosions and fires.
- 1.2 Therefore, a Fit for Duty program is essential to assess and monitor workers' health and fitness both prior to employment and during the course of work; to provide emergency and other treatment as needed; and to keep accurate records for future reference.
- 1.3 JDM Janitorial Inc. has developed the following policy on Fit for Duty to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, hard hats, work boots, work gloves, respirators.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Physicals

- 4.1 It is the policy of JDM Janitorial Inc. that pre-employment physicals are required.
- 4.2 Physicals will also be required when changing into different jobs or working environments.

5 Drug & Alcohol Screening

- 5.1 JDM Janitorial Inc. requires drug and alcohol screening and employees will be subject to testing when:
- 5.2 Pre-employment,
- 5.3 Post-accident,
- 5.4 Random/Suspicion or
- 5.5 As prescribed by DOT or the host facilities.



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6 Medications

- 6.1 It is a requirement of JDM Janitorial Inc. that employees must report to their supervisor any medications they are taking.
- 6.2 Over-the-counter medications such as allergy or cold and flu medications could also impair one's ability to perform safely and must also be reported to their supervisor.

7 Employee Monitoring

- 7.1 Employees of JDM Janitorial Inc. will be monitored to ensure that their activities and behaviors are normal.
- 7.2 If an employee is noticed to be fatigued, they will be removed from the worksite.
- 7.3 Employees are responsible for ensuring they are physically and mentally fit to perform their job safely.
- 7.4 Employees that are not able to perform their duties safely due to their physical or mental state, are responsible for notifying their supervisor.
- 7.5 Employees must take responsibility for their own safety as well as not report to work in a condition as to endanger the safety of their fellow workers.

8 Determination of Fitness for Duty

8.1 Workers at hazardous waste sites are often required to perform strenuous tasks and wear personal protective equipment, such as respirators and protective clothing, that may cause heat stress and other problems. To ensure that prospective employees are able to meet work requirements, the pre-employment screening should focus on the following areas:

8.1.1 Occupational and Medical History

- 8.1.1.1 Make sure the worker fills out an occupational and medical history questionnaire. Review the questionnaire before seeing the worker. In the examining room, discuss the questionnaire with the worker, paying special attention to prior occupational exposures to chemical and physical hazards.
- 8.1.1.2 Review past illnesses and chronic diseases, particularly atopic diseases such as eczema and asthma, lung diseases, and cardiovascular disease.
- 8.1.1.3 Review symptoms, especially shortness of breath or labored breathing on exertion, other chronic respiratory symptoms, chest pain, high blood pressure, and heat intolerance.
- 8.1.1.4 Identify individuals who are vulnerable to particular substances (e.g., someone with a history of severe asthmatic reaction to a specific chemical).
- 8.1.1.5 Record relevant lifestyle habits (e.g., cigarette smoking, alcohol and drug use) and hobbies.



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8 Determination of Fitness for Duty Continued

8.1.2 Physical Examination

- 8.1.2.1 Conduct a comprehensive physical examination of all body organs, focusing on the pulmonary, cardiovascular, and musculoskeletal systems.
- 8.1.2.2 Note conditions that could increase susceptibility to heat stroke, such as obesity and lack of physical exercise.
- 8.1.2.3 Note conditions that could affect respirator use, such as missing or arthritic fingers, facial scars, dentures, poor eyesight, or perforated ear drums.

8.1.3 Ability to Work While Wearing Protective Equipment

- 8.1.3.1 Disqualify individuals who are clearly unable to perform based on the medical history and physical exam (e.g., those with severe lung disease, heart disease, or back or orthopedic problems).
- 8.1.3.2 Note limitations concerning the worker's ability to use protective equipment (e.g., individuals who must wear contact lenses cannot wear full-face piece respirators).
- 8.1.3.3 Provide additional testing (e.g., chest X-ray, pulmonary function testing, electrocardiogram) for ability to wear protective equipment where necessary.
- 8.1.3.4 Base the determination on the individual worker's profile (e.g., medical history and physical exam, age, previous exposures and testing).

5.1.3 Ability to Work While Wearing Protective Equipment Continued

8.1.3.5 Make a written assessment of the worker's capacity to perform while wearing a respirator, if wearing a respirator is a job requirement. Note that the Occupational Safety and Health Administration (OSHA) respirator standard (29 CFR Part 1910.134) states that no employee should be assigned to a task that requires the use of a respirator unless it has been determined that the person is physically able to perform under such conditions.

9 Baseline Data for Future Exposures

9.1 Pre-employment screening can be used to establish baseline data to subsequently verify the efficacy of protective assures and to later determine if exposures have adversely affected the worker. Baseline testing may include both medical screening tests and biologic monitoring tests.



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10 Ability to Perform While Wearing Protective Equipment

- 10.1 To determine a worker's capacity to perform while wearing protective equipment, additional tests may be necessary, for example:
- 10.1.1 Pulmonary function testing. Measurement should include forced expiratory volume in 1 second (FEV1), forced vital capacity (FVC), and FEV1-to-FVC ratio, with interpretation and comparison to, normal predicted values corrected for age, height, race, and sex. Other factors such as FEF, MEFR, MVV, FRC, RV, and TLC1 may be included for additional information. A permanent record of flow curves should be placed in the worker's medical records. The tests should be conducted by a certified technician and the results interpreted by a physician.
- 10.1.2 Electrocardiogram (EKG). At least one standard, 12-lead resting EKG should be performed at the discretion of the physician. A "stress test" (graded exercise) may be administered at the discretion of the examining physician, particularly where heat stress may occur.

11 Baseline Monitoring

11.1 If there is likelihood of potential onsite exposure to a particular toxicant, specific baseline monitoring should be performed to establish data relating to that toxicant.

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General Waste Management	Reference: 29 CFR 1926.252, Client Requirement	
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CHAPTER 14

1 General Waste Management Program

- 1.1 The program covers scrap materials, project wastes, trash and proper handling, organization, and storage of waste and scrap materials to minimize potential impact to the environment.
- 1.2 The proper method to dispose of wastes.
- 1.3 Segregation of wastes and opportunities for recycling.
- 1.4 JDM Janitorial Inc. has developed the following policy on General Waste Management to ensure the safety of our employees, protect the environment and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting.
- 2.2 PPE: Safety Vest, Hard Hats, Work Boots

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

4.1 All affected company employees will be trained on the proper handling, storage, and disposal of wastes, between non-hazardous waste training and hazardous waste training.

5 Project Waste

- 5.1 The company to estimate the waste products such as production wastes, trash, scraps, solid wastes, and non-hazardous wastes that the company will generate so as to adequately prepare for the amount of waste removal containers and so logistics for removal can be properly assessed.
- 5.2 Prior to work being performed it is a requirement of JDM Janitorial Inc. that the generated waste is estimated so that the proper number of containers are available.
- 5.3 The proper handling, organization, and storage of waste and scrap materials to minimize potential impact to the environment is important to JDM Janitorial Inc..
- 5.4 Waste materials must be properly stored and handled to minimize the potential for a spill or impact to the environment.



General Waste Management	Reference: 29 CFR 1926. Requirement	252, Client	
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- 5.5 During outdoor activities, receptacles must be covered to prevent dispersion of waste materials and to control the potential for run-off.
- 5.6 JDM Janitorial Inc. shall inform affected company employees of site-specific waste management procedures prior to their initial assignment and upon any changes in the site-specific waste management plan.

6 Disposal of Waste

- 6.1 Employees of JDM Janitorial Inc. will be instructed on the proper disposal method for wastes per job. The general instruction covers disposal of non-hazardous wastes, trash, or scrap materials.
- 6.1.1 If wastes generated are classified as hazardous, employees must be trained to ensure proper disposal.
- 6.2 During the course of construction, alteration, or repairs, form and scrap lumber with protruding nails, and all other debris, must be kept cleared from work areas, passageways, and stairs, in and around buildings or other structures.
- 6.3 Combustible scrap and debris must be removed at regular intervals during the course of construction. Safe means must be provided to facilitate such removal.
- 6.4 Containers must be provided for the collection and separation of waste, trash, oily and used rags, and other refuse. Containers used for garbage and other oily, flammable, or hazardous wastes, such as caustics, acids, harmful dusts, etc. must be equipped with covers. Garbage and other waste must be disposed of at frequent and regular intervals.
- 6.5 When debris is dropped through holes in the floor without the use of chutes, the area onto which the material is dropped shall be completely enclosed with barricades not less than 42 inches high and not less than 6 feet back from the projected edge of the opening above. Signs warning of the hazard of falling materials shall be posted at each level. Removal shall not be permitted in this lower area until debris handling ceases above.
- 6.6 All scrap lumber, waste material, and rubbish shall be removed from the immediate work area as the work progresses.
- 6.7 Disposal of waste material or debris by burning shall comply with local fire regulations.
- 6.8 All solvent waste, oily rags, and flammable liquids shall be kept in fire resistant covered containers until removed from worksite.

7 Recycling

7.1 It is encouraged by JDM Janitorial Inc. that waste materials be properly segregated for re-use or recycling.

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	Hand & Power Tools	Reference: 29 CFR 1926.300, 302, 1910.242, 244, 1915	
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CHAPTER 15

1 Hand and Power Tools Program

- 1.1 Hand and power tools are a common part of our everyday lives and are present in nearly every industry. These tools help us to easily perform tasks that otherwise would be difficult or impossible.
- 1.2 However, these simple tools can be hazardous and have the potential for causing severe injuries when used or maintained improperly.
- 1.3 Special attention toward hand and power tool safety is necessary in order to reduce or eliminate these hazards.
- 1.4 JDM Janitorial Inc. has developed the following policy on Hand and Power Tools to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, tool specific training.
- 2.2 PPE: Safety Vests, Safety glasses, Gloves, Hard hats, Work boots.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the use of Hand and Power Tools.

5 Tools and Equipment

- 5.1 It is the policy of JDM Janitorial Inc. that all tools and equipment must be maintained and kept in safe condition.
- 5.1.1 Whether furnished by JDM Janitorial Inc. or the employee.
- 5.2 When power operated tools are designed to accommodate guards, they must be equipped with such guards when in use.
- 5.3 Belts, gears, shafts, pulleys, sprockets, spindles, drums, fly wheels, chains, or other reciprocating, rotating or moving parts of equipment must be guarded if such parts are exposed to contact by employees or otherwise create a hazard.
- 5.4 Employees must not manipulate guards in a manner that will compromise the integrity or the protection for which the guard is intended.

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5. Tools and Equipment Continued

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- 5.5 Guarding must meet the requirements as set forth in ANSI, B15.1-1953 (R1958), Safety Code for Mechanical Power-Transmission Apparatus.
- 5.6 Electric power operated tools must either be of the approved double-insulated type or grounded.
- 5.7 The use of electric cords for hoisting or lowering tools is not permitted.
- 5.8 Pneumatic power tools must be secured to the hose or whip by some positive means to prevent the tool from becoming accidentally disconnected.
- 5.9 Safety clips or retainers must be securely installed and maintained on pneumatic impact (percussion) tools to prevent attachments from being accidentally expelled.
- 5.10 All pneumatically driven nailers, staplers, and other similar equipment provided with automatic fastener feed, which operate at more than 100 p.s.i. pressure at the tool must have a safety device on the muzzle to prevent the tool from ejecting fasteners, unless the muzzle is in contact with the work surface.
- 5.11 Compressed air must not be used for cleaning purposes except where reduced to less than 30 p.s.i. and then only with effective chip guarding and personal protective equipment. The 30 p.s.i. requirement does not apply for concrete form, mill scale and similar cleaning purposes.
- 5.12 The manufacturer's safe operating pressure for hoses, pipes, valves, filters, and other fittings must not be exceeded,
- 5.13 The use of hoses for hoisting or lowering tools must not be permitted.
- 5.14 All hoses exceeding 1/2-inch inside diameter must have a safety device at the source of supply or branch line to reduce pressure in case of hose failure.
- 5.15 Airless spray guns of the type which atomize paints and fluids at high pressures (1,000 pounds or more per square inch) must be equipped with automatic or visible manual safety devices which will prevent pulling of the trigger to prevent release of the paint or fluid until the safety device is manually released.
- 5.16 In lieu of the above, a diffuser nut which will prevent high pressure, high velocity release, while the nozzle tip is removed, plus a nozzle tip guard which will prevent the tip from coming into contact with the operator, or other equivalent protection, must be provided.

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5. Tools and Equipment Continued

- 5.17 "Abrasive blast cleaning nozzles." The blast cleaning nozzles must be equipped with an operating valve which must be held open manually. A support must be provided on which the nozzle may be mounted when it is not in use.
- 5.18 All fuel powered tools must be stopped while being refueled, serviced, or maintained, and fuel must be transported, handled, and stored.
- 5.19 Do not use fuel powered tools in enclosed spaces.
- 5.20 "Hydraulic power tools" The fluid used in hydraulic powered tools must be fire-resistant fluids approved under Schedule 30 of the U.S. Bureau of Mines, Department of the Interior, and must retain its operating characteristics at the most extreme temperatures to which it will be exposed.
- 5.21 The manufacturer's safe operating pressures for hoses, valves, pipes, filters, and other fittings must not be exceeded.
- 5.22 "Powder-actuated tools" Only employees who have been trained in the operation of the particular tool in use are allowed to operate a powder-actuated tool.
- 5.23 The tool must be tested each day before loading to see that safety devices are in proper working condition. The method of testing must be in accordance with the manufacturer's recommended procedure.
- 5.24 Any tool found not in proper working order, or that develops a defect during use, must be immediately removed from service and not used until properly repaired.
- 5.25 Tools must not be loaded until just prior to the intended firing time. Neither loaded nor empty tools are to be pointed at any employees. Hands must be kept clear of the open barrel end.
- 5.26 Loaded tools must not be left unattended.
- 5.27 Fasteners must not be driven into very hard or brittle materials including, but not limited to, cast iron, glazed tile, surface-hardened steel, glass block, live rock, face brick, or hollow tile.
- 5.28 Driving into materials easily penetrated will be avoided unless such materials are backed by a substance that will prevent the pin or fastener from passing completely through and creating a flying missile hazard on the other side.



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- 5.29 No fastener will be driven into a spalled area caused by an unsatisfactory fastening.
- 5.30 Tools must not be used in an explosive or flammable atmosphere.
- 5.31 All tools must be used with the correct shield, guard, or attachment recommended by the manufacturer.
- 5.32 Powder-actuated tools used by employees must meet all other applicable requirements of American National Standards Institute, A10.3-1970, Safety Requirements for Explosive-Actuated Fastening Tools.

6 Defective Tools

- 6.1 It is a requirement of JDM Janitorial Inc. that defective tools be removed from service until deemed safe to return to work.
- 6.2 The use of any machinery, tool, material, or equipment which is not in compliance with any applicable requirement of this part is prohibited.
- 6.3 If such tool cannot be removed it must be tagged or locked to make the tool inoperable.

7 Personal Protective Equipment

- 7.1 JDM Janitorial Inc. will provide the necessary PPE to protect employees from the risk and hazards associated with tools and equipment. Example hazards from hand and power tools are:
- 7.1.1 Falling,
- 7.1.2 Flying,
- 7.1.3 Abrasive,
- 7.1.4 Splashing Objects,
- 7.1.5 Harmful Dust,
- 7.1.6 Fumes,
- 7.1.7 Mists Vapors, Or Gases.
- 7.2 Examples of PPE are:
- 7.2.1 Hard hats,
- 7.2.2 Safety glasses,
- 7.2.3 Work boots,
- 7.2.4 Ear plugs,
- 7.2.5 Safety vests,
- 7.2.6 Work gloves, etc.



Hazard Communication	Reference: 29 CFR 1910.1200	
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CHAPTER 16

1 Hazard Communication Program

- 1.1 The Hazard Communication Standard (HCS) is now aligned with the Globally Harmonized System of Classification and Labeling of Chemicals (GHS).
- 1.2 JDM Janitorial Inc. shall develop, implement, and maintain at each workplace a written hazard communication program that describes how the requirements for labels and other forms of warning, safety data sheets, and employee information and training will be met.
- 1.3 This update to the Hazard Communication Standard (HCS) provides a common and coherent approach to classifying chemicals and communicating hazard information on labels and safety data sheets.
- 1.4 Under this program employees are informed of the contents of the OSHA Hazard Communications Standard, the hazardous properties of chemicals with which they work, safe handling procedures and measures to take to protect themselves from these chemicals.
- 1.5 These chemicals may be physical or health related.
- 1.6 This written hazard communication plan is available for review by all employees by request through Connie Holguin.
- 1.7 JDM Janitorial Inc. has developed the following policy on Hazard Communication to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Certification training.
- 2.2 PPE: Safety vests, SDS, Hazardous chemicals list.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the risk of hazardous chemical exposure.
- 4.1.1 Training will be done prior to employees starting their job, (Safety meeting)
- 4.1.2 Before being exposed to a new hazardous chemical. (Safety meeting)



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4. Training Continued

- 4.2 The training will cover the following topics:
- 4.2.1 An overview of the requirements in OSHA's Hazard Communication Standard.
- 4.2.2 Hazardous chemicals present in their workplace.
- 4.2.3 Any operations in their work area where hazardous chemicals are used.
- 4.2.4 The location of the written hazard communication plan and where it may be reviewed.
- 4.2.5 How to understand and use the information on labels and in Safety Data Sheets.
- 4.2.6 Physical and health hazards of the chemicals in their work areas.
- 4.2.7 Methods used to detect the presence or release of hazardous chemicals in the work area.
- 4.2.8 Steps we have taken to prevent or reduce exposure to these chemicals.
- 4.2.9 How employees can protect themselves from exposure to these hazardous chemicals through use of engineering controls/work practices and personal protective equipment.
- 4.2.10 An explanation of any special labeling present in the workplace.
- 4.2.10.1 What are pictograms?
- 4.2.10.2 What are the signal words?
- 4.2.10.3 What are the hazard statements?
- 4.2.10.4 What are the precautionary statements?
- 4.2.11 Emergency procedures to follow if an employee is exposed to these chemicals.
- 4.3 Connie Holguin is responsible to ensure that employees receive this training.
- 4.3.1 After attending the training, employees will sign a form verifying that they understand the above topics and how the topics are related to our hazard communication plan.
- 4.3.2 Prior to introducing a new chemical hazard into any department, each employee in that department will be given information and training as outlined above for the new chemical hazard.



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5 Hazardous Chemicals

- 5.1 A list is attached to this plan that identifies all hazardous chemicals with a potential for employee exposure at this workplace.
- 5.2 Detailed information about the physical, health, and other hazards of each chemical is included in a Safety Data Sheet (SDS); the product identifier for each chemical on the list matches and can be easily cross-referenced with the product identifier on its label and on its Safety Data Sheet.

5.3 Hazardous Chemicals List

6 Containers of Hazardous Chemicals

- 6.1 JDM Janitorial Inc.'s labelling system will follow the requirements in the 2012 revision of the OSHA Hazard Communication Standard to be consistent with the United Nations Globally Harmonized System (GHS) of Classification of Labeling of Chemicals.
- 6.2 The label on the chemical is intended to convey information about the hazards posed by the chemical through standardized label elements, including symbols, signal words and hazard statements. All hazardous chemical containers used at this workplace will have:
- 6.2.1 The original manufacturer's label that includes a product identifier, an appropriate signal word, hazard statement(s), pictogram(s), precautionary statement(s) and the name, address, and telephone number of the chemical manufacturer, importer, or other responsible party.
- 6.2.2 A label with the appropriate label elements just described.
- 6.2.3 Workplace labeling that includes the product identifier and words, pictures, symbols, or combination that provides at least general information regarding the hazards of the chemicals.



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6. Containers of Hazardous Chemicals Continued

- 6.3 JDM Janitorial Inc. or their designee will ensure that all containers are appropriately labeled.
- 6.3.1 No container will be released for use until this information is verified.
- 6.3.2 Workplace labels must be legible and in English.
- 6.3.3 Information in other languages is available through request from Connie Holguin or their designee.
- 6.4 Small quantities intended for immediate use may be placed in a container without a label, provided that the individual keeps it in their possession at all times and the product is used up during the work shift or properly disposed of at the end of the work day.
- 6.4.1 However, the container should be marked with its contents.

7 Safety Data Sheets

- 7.1 The manufacturer or importer of a chemical is required by OSHA to develop a Safety Data Sheet (SDS) that contains specific, detailed information about the chemical's hazard using a specified format.
- 7.2 The distributor or supplier of the chemical is required to provide this SDS to the purchaser.
- 7.3 SDS's are readily available to all employees during their work shifts.
- 7.4 Employees can review SDS for all hazardous chemicals used at this workplace in the main office of by request through Connie Holguin or their designee.
- 7.5 The SDS's are updated and managed by Connie Holguin or their designee.
- 7.6 If a SDS is not immediately available for a hazardous chemical, employees can obtain the required information by calling Connie Holguin at (682) 404-7711.
- 7.7 Where employees must travel between workplaces during a workshift, 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.



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8 Special Tasks (Non-Routine Tasks)

- Before employees perform special (non-routine) tasks that may expose them to hazardous 8.1 chemicals, their supervisors will inform them about the chemicals' hazards.
- 8.2 Their supervisors also will inform them about how to control exposure and what to do in an emergency.
- 8.3 JDM Janitorial Inc. will evaluate the hazards of these tasks and provide appropriate controls including Personal Protective Equipment all additional training as required.

8.4	Examples of special tasks that may expose employees to hazardous chemicals include the following:	

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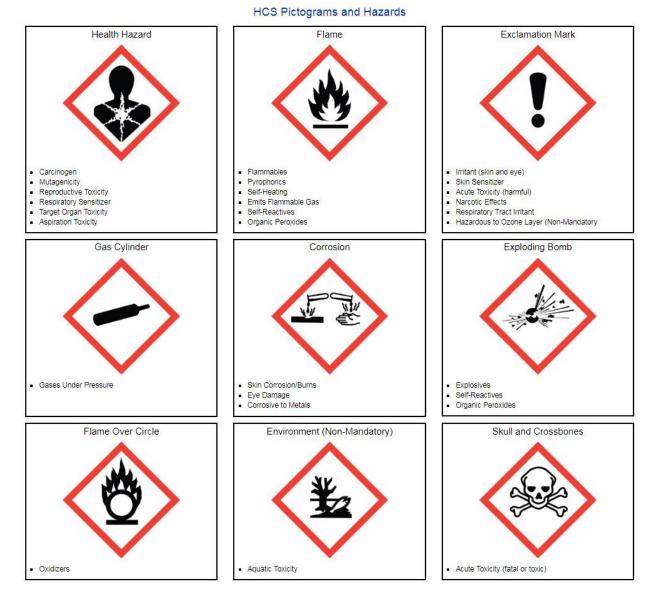
9 Informing Contractors/Employers about our Hazardous Chemicals

- 9.1 If employees of other employer(s) may be exposed to hazardous chemicals at our workplace (for example, employees of a construction contractor working on-site).
- 9.2 It is the responsibility of Connie Holguin to provide contractors and their employees with the following information:
- 9.2.1 The identity of the chemicals, how to review our Safety Data Sheets, and an explanation of the container labeling system.
- 9.2.2 Safe work practices to prevent exposure. (name of person or job title) will also obtain a Safety Data Sheet for any hazardous chemical a contractor brings into the workplace.
- 9.3 JDM Janitorial Inc. will make the written hazard communication program available, upon request, to employees, their designated representatives, the Assistant Secretary and the Director.
- 9.4 Where employees must travel between workplaces during a work shift, i.e., their work is carried out at more than one geographical location, the SDS's may be kept at the primary workplace facility.



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HCS Pictograms & Hazards





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CHAPTER 17

1 Hazardous Waste Operations & Emergency Response / RCRA

- 1.1 An unexpected release of hazardous substances, or a substantial threat of a hazardous substance release, can pose a significant health and safety risk to workers. Unexpected releases can be caused by operation failures and unrelated outside events (e.g., natural disasters, terrorism).
- 1.2 Workers can encounter hazardous substances through waste dumped in the environment, a serious safety and health issue that continues to endanger life and environmental quality.
- 1.3 JDM Janitorial Inc. has developed the following policy on Hazardous Waste Operations and Emergency Response to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Certification training.
- 2.2 PPE: Safety vests, work boots, work gloves, safety goggles, hard hats, ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 All affected company employees, including those in a supervisory or management position, that are exposed to hazardous substances, health hazards, or safety hazards must receive appropriate training prior to those affected company employees being allowed to participate in hazardous material operations that could potentially expose them to the aforementioned hazards.
- 4.2 It's required that those affected company employees that work on-site with exposure to substances deemed to be hazardous must be trained before being allowed to perform job tasks in hazardous waste operations.

4.3 New employees

- 4.3.1 Training will be provided for new employees exposed to health hazards or hazardous substances at JDM Janitorial Inc. to enable the employees to perform their assigned duties and functions in a safe and healthful manner so as not to endanger themselves or other employees.
- 4.3.2 The initial training will be for 24 hours and refresher training will be for 8 hours annually.



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4.3.3 Employees who have received the initial training required by this paragraph will be given a written certificate attesting that they have successfully completed the necessary training.

4.4 Current employees

- 4.4.1 When JDM Janitorial Inc. can show by an employee's previous work experience and/or training that the employee has had training equivalent to the initial training required, the training will be considered as meeting the initial training requirements as to that employee.
- 4.4.2 Equipment operators, general laborers, supervisors and management, etc., will be trained prior to being allowed to participate in or supervise field activities.
- 4.4.3 The training will cover the use of personal protective equipment.
- 4.4.4 Also cover work practices which minimize hazardous risks and safe use of engineering controls and equipment.
- 4.4.5 Equivalent training includes the training that existing employees might have already received from actual site work experience.
- 4.4.6 Current employees will receive 8 hours of refresher training annually.

4.5 Trainers

- 4.5.1 Trainers who teach initial training will have satisfactorily completed a training course for teaching the subjects they are expected to teach, or they will have the academic credentials and instruction experience necessary to demonstrate a good command of the subject matter of the courses and competent instructional skills.
- 4.6 Training for emergency response employees will be completed before they are called upon to perform in real emergencies.
- 4.7 Training will include these elements:
- 4.7.1 Emergency response plan,
- 4.7.2 Standard operating procedures JDM Janitorial Inc. has established for the job,
- 4.7.3 The personal protective equipment to be worn and
- 4.7.4 Procedures for handling emergency incidents.
- 4.8 JDM Janitorial Inc. certifies that each covered employee has attended and successfully completed the required training.



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5 Emergency Response Plan

- 5.1 An emergency response plan will be developed and implemented per job to handle anticipated emergencies prior to the commencement of emergency response operations.
- 5.2 The plan will be in writing and available for inspection and copying by employees, their representatives and OSHA personnel.
- 5.3 Note: Employers who will evacuate their employees from the danger area when an emergency occurs, and who do not permit any of their employees to assist in handling the emergency, are exempt from the requirements of this paragraph if they provide an emergency action plan in accordance with 29 CFR 1910.38.
- 5.4 The emergency response plan for emergencies will address the following areas:
- 5.4.1 Pre-emergency planning and coordination with outside parties.
- 5.4.2 Personnel roles, lines of authority, training, and communication.
- 5.4.3 Emergency recognition and prevention.
- 5.4.4 Safe distances and places of refuge.
- 5.4.5 Site security and control.
- 5.4.6 Evacuation routes and procedures.
- 5.4.7 Decontamination.
- 5.4.8 Emergency medical treatment and first aid.
- 5.4.9 Emergency alerting and response procedures.
- 5.4.10 Critique of response and follow-up.
- 5.4.11 PPE and emergency equipment.

6 Engineering Controls

- 6.1 Work practices, PPE, and engineering controls such the use of pressurized cabs or control booths on equipment, and/or the use of remotely operated material handling equipment will be used to reduce and maintain exposure limits.
- 6.2 Engineering controls that could be considered feasible include the use of pressurized cabs, control booths, ventilation, and the use of remotely operated material handling equipment.
- 6.3 Safe work practice controls which may be feasible include limiting the number of company employees that can be affected from potential exposure, staging affected company employees upwind of potential chemical hazards, and specific training.



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7 Procedures for Handling Emergency Response

- 7.1 The senior emergency response official responding to an emergency will become the individual in charge of a site-specific Incident Command System (ICS).
- 7.2 All emergency responders and their communications will be coordinated and controlled through the individual in charge of the ICS assisted by the senior official present.
- 7.3 The "senior official" at an emergency response is the most senior official on the site who has the responsibility for controlling the operations at the site.
- 7.4 Initially it is the senior officer on the first-due piece of responding emergency apparatus to arrive on the incident scene. As more senior officers arrive (i.e., battalion chief, fire chief, state law enforcement official, site coordinator, etc.) the position is passed up the line of authority which has been previously established.
- 7.5 The individual in charge of the ICS will identify, to the extent possible, all hazardous substances or conditions present and will address as appropriate:
- 7.5.1 Site analysis,
- 7.5.2 Use of engineering controls,
- 7.5.3 Maximum exposure limits,
- 7.5.4 Hazardous substance handling procedures and
- 7.5.5 Use of any new technologies.
- 7.6 Based on the hazardous substances and/or conditions present, the individual in charge of the ICS will implement appropriate emergency operations, and assure that the personal protective equipment worn is appropriate for the hazards to be encountered.
- 7.6.1 Personal protective equipment must meet, at a minimum, the criteria contained in 29 CFR 1910.156(e) when worn while performing fire fighting operations beyond the incipient stage for any incident.
- 7.7 Employees engaged in emergency response and exposed to hazardous substances presenting an inhalation hazard or potential inhalation hazard must wear positive pressure self-contained breathing apparatus while engaged in emergency response, until such time that the individual in charge of the ICS determines through the use of air monitoring that a decreased level of respiratory protection will not result in hazardous exposures to employees.
- 7.8 The individual in charge of the ICS will limit the number of emergency response personnel:
- 7.8.1 At the emergency site,
- 7.8.2 In those areas of potential or actual exposure to incident or site hazards and
- 7.8.3 To those who are actively performing emergency operations.



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- 7.9 Operations in hazardous areas must be performed using the buddy system in groups of two or more.
- 7.10 Back-up personnel must be standing by with equipment ready to provide assistance or rescue.
- 7.11 Qualified basic life support personnel, as a minimum, will also be standing by with medical equipment and transportation capability.
- 7.12 The individual in charge of the ICS will designate a safety officer, who is knowledgeable in the operations being implemented at the emergency response site, with specific responsibility to identify and evaluate hazards and to provide direction with respect to the safety of operations for the emergency at hand.
- 7.13 When activities are judged by the safety officer to be an IDLH and/or to involve an imminent danger condition, the safety officer will have the authority to alter, suspend, or terminate those activities.
- 7.14 The safety official must immediately inform the individual in charge of the ICS of any actions needed to be taken to correct these hazards at the emergency scene.
- 7.15 After emergency operations have terminated, the individual in charge of the ICS will implement appropriate decontamination procedures.
- 7.16 When deemed necessary for meeting the tasks at hand, approved self-contained compressed air breathing apparatus may be used with approved cylinders from other approved self-contained compressed air breathing apparatus provided that such cylinders are of the same capacity and pressure rating.
- 7.16.1 All compressed air cylinders used with self-contained breathing apparatus shall meet U.S. Department of Transportation and National Institute for Occupational Safety and Health criteria.

8 Skilled Support Personnel

- 8.1 Personnel, not necessarily JDM Janitorial Inc.'s own employees, who are skilled in the operation of certain equipment, such as mechanized earth moving or digging equipment or crane and hoisting equipment, and who are needed temporarily to perform immediate emergency support work that cannot reasonably be performed in a timely fashion by JDM Janitorial Inc.'s own employees, and who will be or may be exposed to the hazards at an emergency response scene, are not required to meet the training required in this policy for regular employees.
- 8.2 These personnel will be given an initial briefing at the site prior to their participation in any emergency response.
- 8.3 The initial briefing will include instruction in the wearing of appropriate personal protective equipment, what chemical hazards are involved, and what duties are to be performed.
- 8.4 All other appropriate safety and health precautions provided to JDM Janitorial Inc.'s own employees will be used to assure the safety and health of these personnel.



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9 Specialist Employees

- 9.1 Employees who, in the course of their regular job duties, work with and are trained in the hazards of specific hazardous substances, and who will be called upon to provide technical advice or assistance at a hazardous substance release incident to the individual in charge, will receive training or demonstrate competency in the area of their specialization annually.
- 9.2 Training will be based on the duties and function to be performed by each responder of an emergency response organization.
- 9.3 The skill and knowledge levels required for all new responders, those hired after the effective date of this standard, shall be conveyed to them through training before they are permitted to take part in actual emergency operations on an incident. Employees who participate, or are expected to participate, in emergency response, shall be given training in accordance with the following:

9.3.1 First responder awareness level.

- 9.3.1.1 First responders at the awareness level are individuals who are likely to witness or discover a hazardous substance release and who have been trained to initiate an emergency response sequence by notifying the proper authorities of the release.
- 9.3.1.2 They would take no further action beyond notifying the authorities of the release.
- 9.3.1.3 First responders at the awareness level shall have sufficient training or have had sufficient experience to objectively demonstrate competency in the following areas:
- 9.3.1.3.1 An understanding of what hazardous substances are, and the risks associated with them in an incident.
- 9.3.1.3.2 An understanding of the potential outcomes associated with an emergency created when hazardous substances are present.
- 9.3.1.3.3 The ability to recognize the presence of hazardous substances in an emergency.
- 9.3.1.3.4 The ability to identify the hazardous substances, if possible.
- 9.3.1.3.5 An understanding of the role of the first responder awareness individual in the employer's emergency response plan including site security and control and the U.S. Department of Transportation's Emergency Response Guidebook.
- 9.3.1.3.6 The ability to realize the need for additional resources, and to make appropriate notifications to the communication center.



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9.3.2 First responder operations level.

- 9.3.2.1 First responders at the operations level are individuals who respond to releases or potential releases of hazardous substances as part of the initial response to the site for the purpose of protecting nearby persons, property, or the environment from the effects of the release.
- 9.3.2.2 They are trained to respond in a defensive fashion without actually trying to stop the release.
- 9.3.2.3 Their function is to contain the release from a safe distance, keep it from spreading, and prevent exposures.
- 9.3.2.4 JDM Janitorial Inc. certifies that first responders at the operational level will have received at least 8 hours of training or have had sufficient experience to objectively demonstrate competency in the following areas in addition to those listed for the awareness level:
- 9.3.2.4.1 Knowledge of the basic hazard and risk assessment techniques.
- 9.3.2.4.2 Know how to select and use proper personal protective equipment provided to the first responder operational level.
- 9.3.2.4.3 An understanding of basic hazardous materials terms.
- 9.3.2.4.4 Know how to perform basic control, containment and/or confinement operations within the capabilities of the resources and personal protective equipment available with their unit.
- 9.3.2.4.5 Know how to implement basic decontamination procedures.
- 9.3.2.4.6 An understanding of the relevant standard operating procedures and termination procedures.

9.3.3 Hazardous materials technician.

- 9.3.3.1 Hazardous materials technicians are individuals who respond to releases or potential releases for the purpose of stopping the release.
- 9.3.3.2 They assume a more aggressive role than a first responder at the operations level in that they will approach the point of release in order to plug, patch or otherwise stop the release of a hazardous substance.
- 9.3.3.3 JDM Janitorial Inc. certifies that hazardous materials technicians will have received at least 24 hours of training equal to the first responder operations level and in addition have competency in the following areas:
- 9.3.3.3.1 Know how to implement the employer's emergency response plan.
- 9.3.3.3.2 Know the classification, identification and verification of known and unknown materials by using field survey instruments and equipment.
- 9.3.3.3.3 Be able to function within an assigned role in the Incident Command System.



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- 9.3.3.3.4 Know how to select and use proper specialized chemical personal protective equipment provided to the hazardous materials technician.
- 9.3.3.3.5 Understand hazard and risk assessment techniques.
- 9.3.3.3.6 Be able to perform advance control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available with the unit.
- 9.3.3.3.7 Understand and implement decontamination procedures.
- 9.3.3.3.8 Understand termination procedures.
- 9.3.3.3.9 Understand basic chemical and toxicological terminology and behavior.

9.3.4 Hazardous materials specialist.

- 9.3.4.1 Hazardous materials specialists are individuals who respond with and provide support to hazardous materials technicians.
- 9.3.4.2 Their duties parallel those of the hazardous materials technician, however, those duties require a more directed or specific knowledge of the various substances they may be called upon to contain.
- 9.3.4.3 The hazardous materials specialist would also act as the site liaison with Federal, state, local and other government authorities in regards to site activities.
- 9.3.4.4 JDM Janitorial Inc. certifies that hazardous materials specialists will have received at least 24 hours of training equal to the technician level and in addition have competency in the following areas:
- 9.3.4.4.1 Know how to implement the local emergency response plan.
- 9.3.4.4.2 Understand classification, identification and verification of known and unknown materials by using advanced survey instruments and equipment.
- 9.3.4.4.3 Know the state emergency response plan.
- 9.3.4.4.4 Be able to select and use proper specialized chemical personal protective equipment provided to the hazardous materials specialist.
- 9.3.4.4.5 Understand in-depth hazard and risk techniques.
- 9.3.4.4.6 Be able to perform specialized control, containment, and/or confinement operations within the capabilities of the resources and personal protective equipment available.
- 9.3.4.4.7 Be able to determine and implement decontamination procedures.
- 9.3.4.4.8 Have the ability to develop a site safety and control plan.



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9.3.4.4.9 Understand chemical, radiological and toxicological terminology and behavior.

9.3.5 On scene incident commander.

- 9.3.5.1 JDM Janitorial Inc. certifies that incident commanders, who will assume control of the incident scene beyond the first responder awareness level, will receive at least 24 hours of training equal to the first responder operations level and in addition have competency in the following:
- 9.3.5.1.1 Know and be able to implement the employer's incident command system.
- 9.3.5.1.2 Know how to implement the employer's emergency response plan.
- 9.3.5.1.3 Know and understand the hazards and risks associated with employees working in chemical protective clothing.
- 9.3.5.1.4 Know how to implement the local emergency response plan.
- 9.3.5.1.5 Know of the state emergency response plan and of the Federal Regional Response Team.
- 9.3.5.1.6 Know and understand the importance of decontamination procedures.

9.3.6 Trainers

9.3.6.1 Trainers who teach any of the above training subjects must have satisfactorily completed a training course for teaching the subjects they are expected to teach, such as the courses offered by the U.S. National Fire Academy, or they must have the training and/or academic credentials and instructional experience necessary to demonstrate competent instructional skills and a good command of the subject matter of the courses they are to teach.

10 Refresher Training

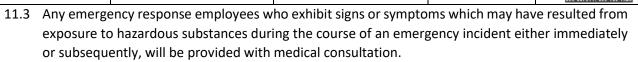
- 10.1 Those employees who are trained in accordance with this policy will receive annual refresher training of sufficient content and duration to maintain their competencies, or will demonstrate competency in those areas at least yearly.
- 10.2 A statement will be made of the training or competency, and if a statement of competency is made, a record of the methodology used to demonstrate competency must be kept.

11 Medical Surveillance & Consultation

- 11.1 All employees who are or may be exposed to hazardous substances or health hazards at or above the established permissible exposure limit, above the published exposure levels for these substances, without regard to the use of respirators, for 30 days or more a year must be provided medical surveillance.
- 11.2 Members of an organized and designated HAZMAT team and hazardous materials specialist will receive a baseline physical examination and be provided with medical surveillance.



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12 Chemical protective Clothing

12.1 Chemical protective clothing and equipment to be used by organized and designated HAZMAT team members, or to be used by hazardous materials specialists, must meet the requirements for chemical protective clothing and equipment.

13 Post-Emergency Response Operations

13.1 Upon completion of the emergency response, if it is determined that it is necessary to remove hazardous substances, health hazards and materials contaminated with them (such as contaminated soil or other elements of the natural environment) from the site of the incident, the clean-up shall comply with this policy.

14 Air Monitoring

- 14.1 Air monitoring will be used to identify and quantify airborne levels of hazardous substances.
- 14.2 The monitoring will address initial entry, periodic monitoring, possible IDLH conditions and wherever exposure may be a possibility.

15 Decontamination

- 15.1 A decontamination procedure will be developed, communicated to employees and implemented before any employees or equipment may enter areas on site where the potential for exposure to hazardous substances exists.
- 15.2 All employees leaving a contaminated area must be appropriately decontaminated.
- 15.2.1 All contaminated clothing and equipment leaving a contaminated area shall be appropriately disposed of or decontaminated.
- 15.3 Decontamination procedures will be monitored by the site safety and health supervisor to determine their effectiveness.
- 15.3.1 When such procedures are found to be ineffective, appropriate steps will be taken to correct any deficiencies.
- 15.4 Decontamination will be performed in geographical areas that will minimize the exposure of uncontaminated employees or equipment to contaminated employees or equipment.
- 15.5 PPE and equipment must be decontaminated, cleaned, laundered, maintained or replaced as needed to maintain their effectiveness.
- 15.5.1 Employees whose non-impermeable clothing becomes wetted with hazardous substances must immediately remove the clothing.



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- 15.5.2 Unauthorized employees must not remove protective clothing or equipment from change rooms.
- 15.6 Where the decontamination procedure indicates a need for regular showers and change rooms outside of a contaminated area, they will be provided and meet the requirements of 29 CFR 1910.141.

16 Monitoring

- 16.1 It's required by JDM Janitorial Inc. that proper monitoring must be conducted when there is a possibility of company employee exposures to hazardous concentrations of hazardous substances.
- 16.2 The purpose of the monitoring program is to ensure the appropriate controls to protect workers, such as engineering, safe work practices, and personal protective equipment (PPE) to confirm that affected company employees are not exposed to levels of hazardous substances which exceed the permissible exposure limit (PEL), or in the case of exposure levels where there is no stated PEL, the published exposure levels for those hazardous substances.
- 16.3 Published exposure levels shall come from institutions such as the National Institute for Occupational Safety and Health (NIOSH) or the American Conference of Governmental Industrial Hygienists (ACGIH) or similar organizations.
- 16.4 The program requires to perform monitoring when first entering an area with potentially hazardous materials and to monitor periodically during the work process to ascertain if changes are occurring in the area where hazardous material work is being performed.

Hazard Operate Safety Phone

JDM Janitorial Inc.

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CHAPTER 18

1 Heat Illness Prevention Program

- 1.1 Outdoor workers who are exposed to hot and humid conditions are at risk of heat-related illness. The risk of heat-related illness becomes greater as the weather gets hotter and more humid.
- 1.1.1 This situation is particularly serious when hot weather arrives suddenly early in the season, before workers have had a chance to adapt to warm weather.
- 1.2 For people working outdoors in hot weather, both air temperature and humidity affect how hot they feel. The **"heat index"** is a single value that takes both temperature and humidity into account.
- 1.2.1 The higher the heat index, the hotter the weather feels, since sweat does not readily evaporate and cool the skin. The heat index is a better measure than air temperature alone for estimating the risk to workers from environmental heat sources.
- 1.3 Outdoor workers include any workers who spend a substantial portion of the shift outdoors. Examples include construction workers, agricultural workers, baggage handlers, electrical power transmission and control workers, and landscaping and yard maintenance workers. These workers are at risk of heat-related illness when the heat index is high.
- 1.4 Additional risk factors are listed below. These must be taken into consideration even when the heat index is lower.
- 1.4.1 Work in direct sunlight adds up to 15 degrees to the heat index.
- 1.4.2 Perform prolonged or strenuous work
- 1.4.3 Wear heavy protective clothing or impermeable suits
- 1.5 JDM Janitorial Inc. has developed the following policy on Heat Illness Prevention to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, long sleeves, shade & water breaks.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for for monitoring conditions and implementing the employer's heat plan throughout the workday.

4 Training

- 4.1 Training will be provided for employees in Heat Illness Prevention.
- 4.2 Training is broken out into supervisor and employees (see supervisor and employee training).



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5 Responsibility

5.1 The following is a list of designated individuals who have the authority and responsibility for implementing the provisions of this program at this worksite.

Name	Title	Phone #
Connie Holguin	Safety Coordinator	(682) 404-7711

6 Water Provisions

- 6.1 Drinking water containers (of five to 10 gallons each) will be brought to the site, so that at least two quarts per employee are available at the start of the shift.
- 6.1.1 All workers whether working individually or in smaller crews, will have access to drinking water.
- 6.1.2 Paper cone rims or bags of disposable cups and the necessary cup dispensers will be made available to workers and will be kept clean until used.
- 6.2 As part of the Effective Replenishment Procedures, the water level of all containers will be checked periodically (at least every hour), and more frequently when the temperature rises.
- 6.2.1 Water containers will be refilled with cool water, when the water level within a container drops below 50 percent.
- 6.2.2 Additional water containers (e.g. five gallon bottles) will be carried, to replace water as needed.
- 6.3 Water will be fresh, pure, and suitably cool and provided to employees free of charge.
- 6.3.1 Supervisors will visually examine the water and pour some on their skin to insure that the water is suitably cool.
- 6.3.2 During hot weather, the water must be cooler than the ambient temperature but not so cool as to cause discomfort.
- 6.4 Water containers will be located as close as practicable to the areas where employees are working (given the working conditions and layout of the worksite), to encourage the frequent drinking of water.



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- 6.4.1 If field terrain prevents the water from being placed as close as possible to the workers, bottled water or personal water containers will be made available, so that workers can have drinking water readily accessible.
- 6.4.2 Since water containers are smaller than shade structures, they can be placed closer to employees than shade structures. Placing water only in designated shade areas or where toilet facilities are located is not sufficient.
- 6.4.3 When employees are working across large areas, water will be placed in multiple locations. For example, on a multi-story construction site, water should be placed in a safely accessible location on every floor where employees are working.
- 6.4.4 All water containers will be kept in sanitary condition. Water from non-approved or non-tested water sources (e.g., untested wells) is not acceptable.
- 6.4.5 If hoses or connections are used, they must be governmentally approved for potable drinking water systems, as shown on the manufactures label.
- 6.5 Daily, workers will be reminded of the location of the water coolers and of the importance of drinking water frequently.
- 6.5.1 When the temperature exceeds or is expected to exceed 80 degrees Fahrenheit, brief 'tailgate' meetings will be held each morning to review with employees the importance of drinking water, the number and schedule of water and rest breaks and the signs and symptoms of heat illness.
- 6.5.2 Audible devices (such as whistles or air horns) will be used to remind employees to drink water.
- 6.5.3 When the temperature equals or exceeds 95 degrees Fahrenheit or during a heat wave, pre-sift meetings before the commencement of work to encourage employees to drink plenty of water, and remind employees of their right to take a cool-down rest when necessary will be conducted.
- 6.5.4 Additionally, the number of water breaks will be increased.
- 6.5.5 Supervisors/foreman will lead by example and workers will be reminded throughout the work shift to drink water.
- 6.5.6 Individual water containers or bottled water provided to workers will be adequately identified to eliminate the possibility of drinking from a co-workers container or bottle.

7 Shade Access

- 7.1 Shade structures will be opened and placed as close as practical to the workers, when the temperature equals or exceeds 80 degrees Fahrenheit.
- 7.2 When the temperature is below 80 degrees Fahrenheit, access to shade will be provided promptly, when requested by an employee.
- 7.3 Note: The interior of a vehicle may not be used to provide shade unless the vehicle is airconditioned and the air conditioner is on.



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- 7.4 Enough shade structures will be available at the site, to accommodate all of the employees who are on such a break at any point in time.
- 7.5 During meal periods there will be enough shade for all of the employees who choose to remain in the general area of work or in areas designated for recovery and rest periods.
- 7.6 (Employers may rotate employees in and out of meal periods, as with recovery and rest periods.)
- 7.7 Daily, workers will be informed of the location of the shade structures and will be encouraged to take a five minute cool-down rest in the shade.
- 7.8 An employee who takes a preventative cool-down rest break will be monitored and asked if he/she is experiencing symptoms of heat illness and in no case will the employee be ordered back to work until signs or symptoms of heat illness have abated. (see also the section on Emergency Response for additional information)
- 7.9 Shade structures will be relocated to follow along with the crew and they will be placed as close as practical to the employees, so that access to shade is provided at all times.
- 7.10 All employees on a recovery, rest break or meal period will have full access to shade so they can sit in a normal posture without having to be in physical contact with each other.
- 7.11 In situations where trees or other vegetation are used to provide shade (such as in orchards), the thickness and shape of the shaded area will be evaluated, before assuming that sufficient shadow is being cast to protect employees.
- 7.12 In situations where it is not safe or feasible to provide access to shade (e.g., during high winds), a note will be made of these unsafe or unfeasible conditions, and of the steps that will be taken to provide shade upon request.
- 7.13 For non-agricultural, in situations where it is not safe or feasible to provide shade (mobile equipment and vehicle hazards, high winds), a note will be made of these unsafe or unfeasible conditions, and of the steps that will be taken to provide alternative cooling measures but with equivalent protection as shade.

8 Weather Monitoring

- 8.1 The supervisor will be trained and instructed to check in advance the extended weather forecast.
- 8.2 Weather forecasts can be checked with the aid of:
- 8.2.1 The internet (http://www.nws.noaa.gov/),
- 8.2.2 By calling the National Weather Service phone numbers or
- 8.2.3 By checking the Weather Channel TV Network.
- 8.3 The work schedule will be planned in advance, taking into consideration whether high temperatures or a heat wave is expected.
- 8.4 This type of advance planning must take place all summer long.



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- 8.5 Prior to each workday, the forecasted temperature and humidity for the worksite will be reviewed and will be compared against the National Weather Service Heat Index to evaluate the risk level for heat illness.
- 8.6 Determination will be made of whether or not workers will be exposed at a temperature and humidity characterized as either "extreme caution" or "extreme danger" for heat illnesses.
- 8.7 It is important to note that the temperature at which these warnings occur must be lowered as much as 15 degrees if the workers under consideration are in direct sunlight.
- 8.8 Prior to each workday, the supervisor will monitor the weather (using http://www.nws.noaa.gov/ or with the aid of a simple thermometer) at the worksite.
- 8.9 This critical weather information will be taken into consideration, to determine, when it will be necessary to make modifications to the work schedule (such as stopping work early, rescheduling the job, working at night or during the cooler hours of the day, increasing the number of water and rest breaks).
- 8.10 A thermometer will be used at the jobsite to monitor for sudden increases in temperature, and to ensure that once the temperature exceeds 80 degrees Fahrenheit, shade structures will be opened and made available to the workers.
- 8.11 In addition, when the temperature equals or exceeds 95 degrees Fahrenheit, additional preventive measures such as the High Heat Procedures will be implemented.

9 Heat Waves

- 9.1 Heat wave means any day in which the predicted high temperature for the day will be at least 80 degrees Fahrenheit and at least ten degrees Fahrenheit higher than the average high daily temperature in the preceding five days.
- 9.2 During a heat wave or heat spike, the work day will be cut short or rescheduled (example conducted at night or during cooler hours).
- 9.3 During a heat wave or heat spike, and before starting work, tailgate meetings will be held, to review the company heat illness prevention procedures, the weather forecast and emergency response.
- 9.4 In addition, if schedule modifications are not possible, workers will be provided with an increased number of water and rest breaks and will be observed closely for signs and symptoms of heat illness.
- 9.5 Each employee will be assigned a "buddy" to be on the lookout for signs and symptoms of heat illness and to ensure that emergency procedures are initiated when someone displays possible signs or symptoms of heat illness.

10 High Heat Procedures

10.1 High Heat Procedures are additional preventive measures that this company will use when the temperature equals or exceeds 95 degrees Fahrenheit.



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- 10.2 Effective communication by voice, direct observation (applicable for work crews of 20 or fewer), mandatory buddy system, or electronic means will be maintained, so that employees at the worksite can contact a supervisor when necessary.
- 10.3 If the supervisor is unable to be near the workers (to observe them or communicate with them), then an electronic device, such as a cell phone or text messaging device, may be used for this purpose if reception in the area is reliable.
- 10.4 Frequent communication will be maintained with employees working by themselves or in smaller groups (keep tabs on them via phone or two-way radio), to be on the lookout for possible symptoms of heat illness.
- 10.5 The employee(s) will be contacted regularly and as frequently as possible throughout the day, since an employee in distress may not be able to summon help on his or her own.
- 10.6 Effective communication and direct observation for alertness and/or signs and symptoms of heat illness will be conducted frequently.
- 10.7 When the supervisor is not available, a designated alternate responsible person will be assigned, to look for signs and symptoms of heat illness.
- 10.8 If a supervisor, designated observer, or any employee reports any signs or symptoms of heat illness in any employee, the supervisor or designated person will take immediate action commensurate with the severity of the illness (see Emergency Response Procedures).
- 10.9 Employees will be reminded constantly throughout the work shift to drink plenty of water and take preventative cool-down rest break when needed.

11 Acclimatization Procedures

- 11.1 Acclimatization is the temporary and gradual physiological change in the body that occurs when the environmentally induced heat load to which the body is accustomed is significantly and suddenly exceeded by sudden environmental changes.
- 11.2 In more common terms, the body needs time to adapt when temperatures rise suddenly, and an employee risks heat illness by not taking it easy when a heat wave strikes or when starting a new job that exposes the employee to heat to which the employee's body hasn't yet adjusted.
- 11.3 Inadequate acclimatization can be significantly more perilous in conditions of high heat and physical stress.
- 11.4 The weather will be monitored daily. The supervisor will be on the lookout for sudden heat wave(s), or increases in temperatures to which employees haven't been exposed to for several weeks or longer.
- 11.5 During a heat wave or heat spike, the work day will be cut short (example 12 p.m.), will be rescheduled (example conducted at night or during cooler hours) or if at all possible cease for the day.



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- 11.6 New employees, or those employees who have been newly assigned to a high heat area will be closely observed by the supervisor or designee for the first 14 days. The intensity of the work will be lessened during a two-week break-in period (such as scheduling slower paced, less physically demanding work during the hot parts of the day and the heaviest work activities during the cooler parts of the day (early morning or evening). Steps taken to lessen the intensity of the workload for new employees will be documented.
- 11.7 The supervisor, or the designee will be extra-vigilant with new employees and stay alert to the presence of heat related symptoms.
- 11.8 New employees will be assigned a "buddy" or experienced coworker to watch each other closely for discomfort or symptoms of heat illness.
- 11.9 During a heat wave, all employees will be observed closely (or maintain frequent communication via phone or radio), to be on the lookout for possible symptoms of heat illness.
- 11.10 Employees and supervisors will be trained on the importance of acclimatization, how it is developed and how these company procedures address it.

12 Emergency Response

- 12.1 Prior to assigning a crew to a particular worksite, workers and the foreman will be provided a map of the site, along with clear and precise directions (such as streets or road names, distinguishing features and distances to major roads), to avoid a delay of emergency medical services.
- 12.2 Prior to assigning a crew to a particular worksite, efforts will be made to ensure that a qualified and appropriately trained and equipped person is available at the site to render first aid if necessary.
- 12.3 Prior to the start of the shift, a determination will be made of whether or not a language barrier is present at the site and steps will be taken (such as assigning the responsibility to call emergency medical services to the foreman or an English speaking worker) to ensure that emergency medical services can be immediately called in the event of an emergency.
- 12.4 All foremen and supervisors will carry cell phones or other means of communication, to ensure that emergency medical services can be called. Checks will be made to ensure that these electronic devices are functional prior to each shift.
- 12.5 When an employee is showing symptoms of possible heat illness, steps will be taken immediately to keep the stricken employee cool and comfortable once emergency service responders have been called (to reduce the progression to more serious illness). Under no circumstances will the affected employee be left unattended.
- 12.6 At remote locations such as rural farms, lots or undeveloped areas, the supervisor will designate an employee or employees to physically go to the nearest road or highway where emergency responders can see them. If daylight is diminished, the designated employee(s) shall be given reflective vest or flashlights in order to direct emergency personnel to the location of the worksite, which may not be visible form the road or highway.



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- 12.7 During a heat wave or hot temperatures, workers will be reminded and encouraged to immediately report to their supervisor any signs or symptoms they are experiencing.
- 12.8 Employees and supervisors training will include every detail of these written emergency procedures.

13 Sick Employee Procedures

- 13.1 When an employee displays possible signs or symptoms of heat illness, a trained first aid worker or supervisor will check the sick employee and determine whether resting in the shade and drinking cool water will suffice or if emergency service providers will need to be called. A sick worker will not be left alone in the shade, as he or she can take a turn for the worse!
- 13.2 When an employee displays possible signs or symptoms of heat illness and no trained first aid worker or supervisor is available at the site, emergency service providers will be called.
- 13.3 Emergency service providers will be called immediately if an employee displays signs or symptoms of heat illness (decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, incoherent speech, convulsions, red and hot face), does not look OK or does not get better after drinking cool water and resting in the shade. While the ambulance is in route, first aid will be initiated (cool the worker: place the worker in the shade, remove excess layers of clothing, place ice pack in the armpits and groin area and fan the victim). Do not let a sick worker leave the site, as they can get lost or die before reaching a hospital!
- 13.4 If an employee does not look OK and displays signs or symptoms of severe heat illness (decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, incoherent speech, convulsions, red and hot face), and the worksite is located more than 20 minutes away from a hospital, call emergency service providers, communicate the signs and symptoms of the victim and request Air Ambulance

14 Employee & Supervisory Training

- 14.1 Records of the training will be documented showing the date of training, who performed the training, who attended training and subject(s) covered.
- 14.2 Supervisors will be trained prior to being assigned to supervise other workers. Training will include this company's written procedures and the steps supervisors will follow when employees' exhibit symptoms consistent with heat illness.
- 14.3 Supervisors will be trained on their responsibility to provide water, shade, cool-down rests, and access to first aid as well as the employees' right to exercise their rights under this standard without retaliation.
- 14.4 Supervisors will be trained in appropriate first aid and/or emergency responses to different types of heat illness, and in addition, that heat illness may progress quickly from mild symptoms and signs to serious and life threatening illness.



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14 Employee & Supervisory Training

- 14.5 Supervisors will be trained on how to track the weather at the job site (by monitoring predicted temperature highs and periodically using a thermometer). Supervisors will be instructed on, how weather information will be used to modify work schedules, to increase number of water and rest breaks or cease work early if necessary.
- 14.6 Supervisors must ensure personal factors that contribute to heat related illness are taken into consideration before assigning a task where there is the possibility of a heat-related illness occurring. The most common personal factors that can contribute to heat related illness are age, weight/fitness, drug/alcohol use, prior heat-related illness, etc.
- 14.7 All employees and supervisors will be trained prior to working outside. Training will include all aspects of implementing an effective Heat Illness Prevention Plan including but not limited to; providing sufficient water, providing access to shade, high-heat procedures, emergency response procedures and acclimatization contained in the company's written prevention procedures.
- 14.8 Employees will be trained on the steps that will be followed for contacting emergency medical services, including how they are to proceed when there are non-English speaking workers, how clear and precise directions to the site will be provided and the importance of making visual contact with emergency responders at the nearest road or landmark to direct them to their worksite.
- 14.9 When the temperature is expected to exceed 80 degrees Fahrenheit, short 'tailgate' meetings will be held to review the weather report, to reinforce heat illness prevention with all workers, to provide reminders to drink water frequently, to inform them that shade can be made available upon request and to remind them to be on the lookout for signs and symptoms of heat illness.
- 14.10 New employees will be assigned a "buddy" or experienced coworker to ensure that they understand the training and follow company procedures.

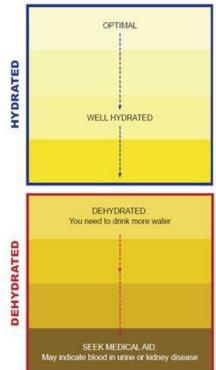


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15 Hydration Chart & Heat Index

Checking the color of your urine can determine whether you are well hydrated or not, use the Hydration Chart below to determine this.

Hydration Chart



Water Consumption Table

Heat Category ^o F	Easy Work	Moderate Work	Hard Work	
	Water Intake (Quart/Hour)	Water Intake (Quart/Hour)	Water Intake (Quart/Hour)	
1	78° - 81.9°	1/2	3/4	3/4
2	82° - 84.9°	%	%	1
3	85° - 87.9°	3/4	3/4	1
4	88° - 89.9°	%	*/4	1
5	> 90°	1	1	1

1.8	80	82	84	86	88	90	92	94	96	98	100	102	104	106	108	11
40	80	81	83	85	88	91	94	97	101	105	109	114	119	124		
45	80	82	84	87	89	93	96	100	104	109	114	119	124	130		
50	81	83	85	88	91	95	99	103	108	113	118	124	131			
55	81	84	86	89	93	97	101	106	112	117	124	150				
60	82	84	88	91	95	100	105	110	116	123	120					
65	82	85	89	93	98	103	108	114	121	128						
70	83	86	90	95	100	105	112	119	12.6	196						
75	84	88	92	97	103	109	116	124								
80	84	89	94	100	106	113	121	129								
85	85	90	96	102	110	117	1.26									
90	86	91	98	105	113	122										
95	86	93	100	108	117	127										
100	87	95	103	112	121											



+	Housekeeping	Reference: www.OSHA.gov	
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CHAPTER 19

1 Housekeeping Program

1.1 JDM Janitorial Inc. has developed the following policy on Housekeeping to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

2.1 Training: Safety meeting.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Responsibilities

- 4.1 Workers:
- 4.1.1 Complete visual inspection of work area on a daily basis and, one time per week, recording all deviations from standard on checklist and reporting these to your supervisor.
- 4.1.2 Cleanup as necessary prior to commencing regular duties.
- 4.2 Supervisors:
- 4.2.1 Distribute and collect reports as required and maintain records.
- 4.2.2 Ensure that work areas that do not meet safety standards are cordon off immediately pending repair.
- 4.2.3 Train workers in how to complete inspections and report deficiencies requiring authorization to repair.
- 4.2.4 Where repairs are required, issue Change Request Form (HACCP) to dispatcher (maintenance supervisor) and provide a copy to the V.P. Operations.
- 4.2.5 Periodically, conduct an inspection before or after the worker's inspection to ensure inspection is accurate and complete.



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- 4.3 Safety coordinator:
- 4.3.1 Participate in the development and review of forms.
- 4.3.2 Ensure that supervisor has been trained in how to complete inspections and train others on how to complete the inspections to the standard.
- 4.3.3 Periodically, conduct an inspection of the work area to ensure the standard is in compliance.

5 Procedure

- 5.1 The supervisors and the Safety Coordinator will develop a checklist for weekly checks of the facility.
- 5.2 This checklist will be reviewed for adequacy as part of all accident investigations.
- 5.3 The supervisor of the department will ensure that copies of the checklist are available to workers as required.
- 5.4 The assigned persons will complete the forms promptly and return them to the supervisor, noting any deviations from standard operating conditions.
- 5.5 Any deviation on key items must result in the work area being cordon off (locked out) and not used pending cleanup and/or repair.
- 5.6 The supervisor will maintain records of all work place inspections.

6 Training

- 6.1 Training in the following areas will be provided:
- 6.1.1 Company Housekeeping Policy,
- 6.1.2 Work place housekeeping standards,
- 6.1.3 General regular housekeeping maintenance.

7 Evaluation

7.1 The JHSC and in consultation with the V.P. Operations shall annually and following any accident / incident evaluate effectiveness of and compliance with this policy.



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8 Housekeeping Checklist

Meets standard < Does not meet standard ×

Comments

Aisles:	
clean, clear, well-marked	
Exits & Entrances:	
clean, clear, well-marked	
free of ice, snow, water	
Hand and portable tools:	
properly stored when in use/ not in use	
Fire Fighting equipment:	
clearly marked & accessible	
Floors:	
clean, clear, in good condition, well drained	
Ladders:	
in good condition, free of oil / grease	
secure when in use / not in use	
Lighting:	
clean, adequate	
Machines:	
clean, clear, in good condition	
Roadways, Parking Area:	
IN GOOD REPAIR, WELL MARKED, CLEAR OF ICE & SNOW	
Signs and Tags:	
adequate, appropriate, clean	
Stacking and Storage:	
area clean and clear, aisles clear, stacks stable, well labeled	
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Housekeeping	Reference: www.OSHA.g	jov	
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Housekeeping Checklist Continued

Stairs:	
NON-SLIP TREAD , CLEAN, CLEAR, IN GOOD CONDITION	
Ventilation System:	
well maintained, clean ,clear	
Waste Disposal / Recycling: emptied frequently, adequate	
number of containers,	
separate & approved containers for oily rags	
	1 1

8.1 Inspection completed by: ______Date : _____



Incident Investigation &	Reference: www.OSHA.gov	
Reporting		
Safety Coordinator	Connie Holguin	
Phone Number	(682) 404-7711	CMS
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CHAPTER 20

1 Incident Investigation & Reporting Program

- 1.1 OSHA strongly encourages employers to investigate all incidents in which a worker was hurt, as well as close calls (sometimes called "near misses"), in which a worker might have been hurt if the circumstances had been slightly different.
- 1.2 In the past, the term "accident" was often used when referring to an unplanned, unwanted event. To many, "accident" suggests an event that was random, and could not have been prevented. Since nearly all worksite fatalities, injuries, and illnesses are preventable, OSHA suggests using the term "incident" investigation.
- 1.3 JDM Janitorial Inc. has developed the following policy on Incident Investigation to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting.
- 2.2 PPE: Safety vest, Hard hats, Work boots, Safety glasses.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Employees of JDM Janitorial Inc. will be trained in their respective roles and responsibilities for incident response and incident investigation.
- 4.2 Training will be conducted prior to initial assignment and annually thereafter.
- 4.3 The training will cover:
- 4.3.1 Incident investigation awareness,
- 4.3.2 First responder, and
- 4.3.3 Investigation techniques.
- 4.4 Members of the investigation team must be trained, qualified, and competent. Members of the investigation team must understand their roles and responsibilities for incident response and be familiar with the techniques used in incident investigations.



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Reporting		
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5 Incidents

- 5.1 It is the policy of JDM Janitorial Inc. that all incidents will be investigated using a root cause analysis.
- 5.2 The written investigation report must include immediate corrective actions to be taken as well as long term actions that are required to prevent the recurrence of the incident.
- 5.3 The written report must include at a minimum, the description of the incident, evidence collected, an explanation as to the cause of the incident, and corresponding corrective actions.
- 5.4 Lessons learned must be reviewed and communicated to affected company employees in order to prevent reoccurrence of the incident or those similar.
- 5.5 Investigations will be conducted to reflect the seriousness of the incident.
- 5.6 Required incidents must be reported to OSHA within 8 hours of their discovery.
- 5.7 Incidents must also be reported to the client as soon as possible, or in a timely manner (within 24 hours of incident).
- 5.8 Before investigating, all emergency response needs must be completed and the incident site must be safe and secure for entry and investigation.
- 5.9 Preserve the scene to prevent material evidence from being removed or altered investigators can use cones, tape, and/or guards.

6 Who Should Conduct and Participate in the Incident Investigation?

- 6.1 Management,
- 6.2 Members of the safety committee (both labor and management members),
- 6.3 Union steward and or union representative.

7 When Should the Incident Investigation be Conducted?

- 7.1 As soon as possible, after the incident occurs or is reported.
- 7.2 Before the scene of the incident is disturbed or changed.
- 7.3 Before victim(s) and witnesses forget what happened.

8 Reporting of Injuries, Incidents and Near-Misses

- 8.1 All injuries, incidents and near-misses should be reported. An incident or near-miss cannot be investigated if it is not reported. The definition of a near-miss is an incident in which an injury could have occurred but did not.
- 8.2 There should be no discipline imposed on an employee who reports an incident or near-miss. Discipline or similar actions by the employer can discourage employees from reporting injuries, incidents or near-misses.



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9 Elements of Incident Investigation

9.1 Elements of our incident investigation include: preparation, on-site investigation and development of a report, with recommendations for prevention.

9.2 Preparation

- 9.2.1 Provide training to investigators, including management, workers, safety committee members and union representatives.
- 9.2.2 Implement a process for notifying investigators when an incident occurs.
- 9.2.3 Create forms to be used for taking notes and documenting conditions.
- 9.2.4 Identify documents that need to be collected.

9.3 On-site Investigation

- 9.3.1 The purpose of on-site investigation is to document conditions and collect information, as well as to do a root-cause analysis to determine the cause(s).
- 9.3.2 It is important to take notes and document any and all information that might be important to the investigation. It is better to have too much information and not use it, than not have the correct information and not be able to get it after the fact.

9.3.3 Collecting evidence at the scene.

- 9.4 Writing equipment such as pens/paper, measurement equipment such as tape measures and rulers, cameras, small tools, audio recorder, PPE, marking devices such as flags, equipment manuals, etc. will be available for use.
- 9.4.1.1 Document conditions using:
- 9.4.1.1.1 Photographs,
- 9.4.1.1.2 Video tapes,
- 9.4.1.1.3 Written notes,
- 9.4.1.1.4 Taking measurements.
- 9.4.2 What to look at and what information to collect. (Not all of the following will apply and this is not an all-inclusive list. You may look at things not on this list.)
- 9.4.2.1 Equipment/machines involved.
- 9.4.2.2 Condition of equipment (e.g. sharp edges, broken pieces, duct tape holding machine together, leaks, frayed electric cords).
- 9.4.2.3 Tools used (e.g. hooks, scissors, knives).



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- 9.4.2.4 Manufacturer and model number of machine(s) being operated at time of incident (if appropriate).
- 9.4.2.5 Manufacturer, year, and model number of forklift or other industrial truck, if incident involved such equipment.
- 9.4.2.6 Environmental conditions including air temperature, noise, and lighting. These may have contributed to incident.
- 9.4.2.7 In the area where the incident occurred, look for conditions such as steam, fog, or haze from chemicals which may have contributed to problems with visibility.
- 9.4.2.8 Safety conditions (e.g. slippery floors, uneven floors, cracked floors, ice on floors, clogged drains).
- 9.4.2.9 Physical obstacles (e.g. tripping hazards, blocked exits).
- 9.4.2.10 Were appropriate machine guards, floor guards, guards for moving augers or other types of guards in place?
- 9.4.3 Evidence such as people, positions of equipment, parts, and papers will be preserved, secured, and collected through notes, photographs, witness statements, flagging, and impoundment of documents and equipment.

10 Interviews

- 10.1 Who to interview?
- 10.1.1 Victim(s),
- 10.1.2 Co-workers,
- 10.1.3 Person who reported incident, near-miss or injury (This person may be different from the victim.),
- 10.1.4 Supervisor of area where incident occurred,
- 10.1.5 Witnesses,
- 10.1.6 Safety director,
- 10.1.7 Others who may have been involved (maintenance, sanitation, etc.),
- 10.1.8 Other workers who have done the job that was being done by the victim.
- 10.2 Where should interview (s) take place?
- 10.2.1 Conference room or other quiet, private room,
- 10.2.2 Not at the scene.



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- 10.3 The purpose of interviews is to get the facts and find out what happened.
- 10.4 Follow up interviews may also be necessary.

10.5 Getting the facts: Asking the questions: when, who, where, what, why?

10.5.1 When: (Time questions)

- 10.5.1.1 What time did incident occur?
- 10.5.1.2 What day of the week did the incident occur?
- 10.5.1.3 How long had victim been working on the day of the incident before he or she was injured?
- 10.5.1.4 Was the individual working overtime?
- 10.5.1.5 What shift did the incident occur on?
- 10.5.1.6 When did shift start?
- 10.5.1.7 How long had the victim worked on his or her particular job (in days, weeks, months, years) before incident occurred?
- 10.5 Getting the facts: Asking the questions: when, who, where, what, why? Continued

10.5.2 Who:

- 10.5.2.1 Who was injured?
- 10.5.2.2 Who witnessed incident?
- 10.5.2.3 Who first responded after incident occurred?
- 10.5.2.4 Who supervised the victim?
- 10.5.2.5 Who has done the same job before?
- 10.5.2.6 Who trained the victim on the job?
- 10.5.2.7 Who installed equipment (if incident involved a piece of equipment)?
- 10.5.2.8 Who provided maintenance on the equipment?
- 10.5.2.9 Who inspected the equipment?
- 10.5.2.10 When the equipment was last inspected and or maintained?
- 10.5.2.11 Who told the victim to do the work he or she was involved in at time of incident?

10.5.3 Where:

- 10.5.3.1 Where did incident occur?
- 10.5.3.2 Where was the victim at the time of the incident?



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- 10.5.3.3 Where were the witnesses?
- 10.5.3.4 Where was the supervisor?

10.5.4 What:

- 10.5.4.1 What happened?
- 10.5.4.2 What was the victim doing at the time of the incident?
- 10.5.4.3 What was the victim doing immediately prior to the incident?
- 10.5.4.4 If this was not the victim's regular job, what was his or her regular job?
- 10.5 Getting the facts: Asking the questions: when, who, where, what, why? Continued

10.5.5 Questions about conditions on the day of the incident

- 10.5.5.1 Was the victim working in crowded conditions? I.e., too close to another worker?
- 10.5.5.2 Was there anything different or abnormal on the day of the incident, with respect to working conditions or the work being done?
- 10.5.5.3 Was the job understaffed or under crewed on the day of the incident or at the time of the incident? i.e. if three people are needed to do the job safely, were all three people working and present?
- 10.5.5.4 If line speed was a factor, was the line moving at normal speed, or was there speed up on the day of the incident?
- 10.5.5.5 Was there more work to do than normal on the day of the incident (thus putting pressure on the worker(s) to work faster or to bypass safety devices)?
- 10.5.5.6 Were workers asked to work overtime on the day of the incident?
- 10.5.6 Regarding Personal Protective Equipment (PPE):
- 10.5.6.1 Was PPE required for the job on which the incident occurred?
- 10.5.6.2 If PPE was required, exactly what kind of PPE was required?
- 10.5.6.3 In the course of the investigation, does it appear that the PPE was inappropriate for this particular job?
- 10.5.6.4 Was the victim wearing the required/appropriate PPE?
- 10.5.6.5 Were there any problems with the PPE on the day of the incident? i.e. was the PPE defective, ill-fitting, had holes, etc.?



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10.5.6.6 Could the PPE in any way have been a contributing factor to the occurrence of the incident / injury?

11 Development of a Report

- 11.1 Based upon the information collected in the investigation, the root cause(s) of the incident will be determined, and recommendations for prevention will address the root cause(s).
- 11.2 Recommendations should address:
- 11.2.1 Issues related to the specific incident,
- 11.2.2 Issues related to similar situations, conditions, equipment,
- 11.2.3 Management system deficiencies,
- 11.2.4 Effective Controls and Prevention Actions,
- 11.2.5 Evaluation of controls and Prevention Actions.
- 11.3 When the report is completed, copies of the report should be made available to all of the participants of the incident investigation. Copies of the report should also be made upon request.
- 11.4 Lessons learned will be reviewed and communicated to prevent reoccurrence or similar events.

12 Severe Injuries & Fatalities

- 12.1 It a requirement of JDM Janitorial Inc. that within eight (8) hours after the death of any employee as a result of a work-related incident, JDM Janitorial Inc. will report the fatality to the Occupational Safety and Health Administration (OSHA), U.S. Department of Labor.
- 12.2 Within twenty-four (24) hours after the in-patient hospitalization of one or more employees or an employee's amputation or an employee's loss of an eye, as a result of a work-related incident, JDM Janitorial Inc. will report the in-patient hospitalization, amputation, or loss of an eye to OSHA.
- 12.3 Severe injuries and/or fatalities will be reported by using one of the following methods:
- 12.3.1 By telephone or in person to the OSHA Area Office that is nearest to the site of the incident,
- 12.3.2 By telephone to the OSHA toll-free central telephone number, 1-800-321-OSHA (1-800-321-6742), or
- 12.3.3 By electronic submission using the reporting application located on OSHA's public web site at www.osha.gov.



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13 Incident Investigation Form

	-				
Incident details					
Name of person involved in	the incident:		Date of incident:		
Location of incident:					
Incident investigation te	eam:				
What task was being performed at the time of the incident?					
What happened? (e.g. 'e	employee tripped over	box' or 'fo	rklift hit wall')		
What factors contribute	d to the incident?				
Environment:		Equipme	ent/materials:		
□ Noise	□ Layout / design	U Wrong job	equipment for the	□ Equipment failure	
Lighting	Dust / fume	🗆 Inadeqi	uate maintenance	Material / equipment too heavy / awkward	
□ Vibration	□ Slip / trip hazard	□ Inadequ	uate guarding	□ Inadequate training provided	
Damaged / unstable floor	□ Other	□ Other			



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12 Incident Investigation Form Continued

	People:		
□ No / inadequate risk assessment conducted	Procedure not followed / no procedure exists		Drugs / alcohol
No / inadequate controls implemented	□ Fatigue		□ Time / production pressures
□ Inadequate training / supervision	Change of r	outine	Distraction / personal issues / stress
	□ Lack of com	munication	□ Other
		When	Completion date
do to fix the problem?		When	Completion date
	<u> </u>	I	
:	Signature		Date
	assessment conducted No / inadequate controls implemented Inadequate training / supervision What are we going to do to fix the problem? Image: A supervision	□ No / inadequate risk assessment conducted □ Procedure n no procedure □ No / inadequate controls implemented □ Fatigue □ Inadequate training / supervision □ Change of re	No / inadequate risk assessment conducted Procedure not followed / no procedure exists No / inadequate controls implemented Fatigue Inadequate training / supervision Change of routine Lack of communication What are we going to do to fix the problem? Who When Image: Supervision Image: Supervision



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Injury / Illness	Reference: 29 CFR 1904.41	Λ
Recordkeeping		
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CHAPTER 21

1 Injury / Illness Recordkeeping Program

1.1 JDM Janitorial Inc. has developed the following policy on Injury/Illness Recordkeeping to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

2.1 Training: Safety Meeting, Log 300, 300A, 301.

3 Competent Person

3.1 Connie Holguin or their designee is the competent person responsible for the program.

4 Training

4.1 Training will be provided by JDM Janitorial Inc. for employees.

5 How does OSHA define a recordable injury or illness?

- 5.1.1 Any work-related fatality.
- 5.1.2 Any work-related injury or illness that results in loss of consciousness, days away from work, restricted work, or transfer to another job.
- 5.1.3 Any work-related injury or illness requiring medical treatment beyond first aid.
- 5.1.4 Any work-related diagnosed case of cancer, chronic irreversible diseases, fractured or cracked bones or teeth, and punctured eardrums.
- 5.1.5 There are also special recording criteria for work-related cases involving:
- 5.1.5.1 Needlesticks and sharps injuries,
- 5.1.5.2 Medical removal,
- 5.1.5.3 Hearing loss; and,
- 5.1.5.4 Tuberculosis.



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6 How does OSHA define first aid?

- 6.1 Using a non-prescription medication at nonprescription strength (for medications available in both prescription and non-prescription form, a recommendation by a physician or other licensed health care professional to use a non-prescription medication at prescription strength is considered medical treatment for recordkeeping purposes).
- 6.2 Administering tetanus immunizations (other immunizations, such as Hepatitis B vaccine or rabies vaccine, are considered medical treatment); Cleaning, flushing or soaking wounds on the surface of the skin.
- 6.3 Using wound coverings such as bandages, Band-Aids[™], gauze pads, etc.; or using butterfly bandages or Steri-Strips[™] (other wound closing devices such as sutures, staples, etc., are considered medical treatment).
- 6.4 Using hot or cold therapy.
- 6.5 Using any non-rigid means of support, such as elastic bandages, wraps, non-rigid back belts, etc. (devices with rigid stays or other systems designed to immobilize parts of the body are considered medical treatment for recordkeeping purposes).
- 6.6 Using temporary immobilization devices while transporting an accident victim (e.g., splints, slings, neck collars, back boards, etc.). Drilling of a fingernail or toenail to relieve pressure, or draining fluid from a blister.
- 6.7 Using eye patches.
- 6.8 Removing foreign bodies from the eye using only irrigation or a cotton swab.
- 6.9 Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means.
- 6.10 Using finger guards.
- 6.11 Using massages (physical therapy or chiropractic treatment are considered medical treatment for recordkeeping purposes), or
- 6.12 Drinking fluids for relief of heat stress.

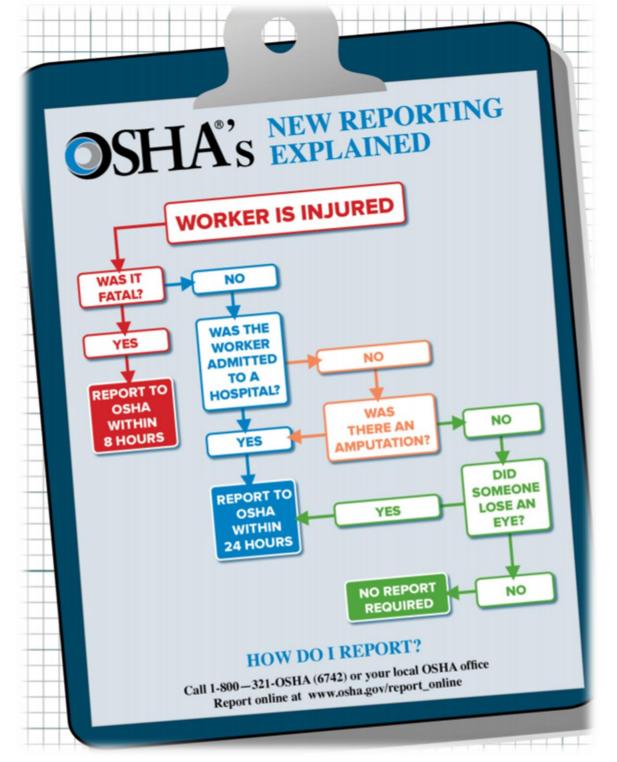


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- 7 Records (OSHA 300/300A)
- 7.1 It is the policy of JDM Janitorial Inc. to keep written records of all work related:
- 7.1.1 Fatalities,
- 7.1.2 Injuries, and
- 7.1.3 Illnesses that:
- 7.1.3.1 Are work-related,
- 7.1.3.2 Are a new case and
- 7.1.3.3 Meets one or more of the general recording criteria.
- 7.2 It is a requirement of JDM Janitorial Inc. that every recordable injury / illness is entered on the appropriate OSHA 300 log for that quarter/month.
- 7.2.1 A 301-incident report or equivalent form must be filled out within 7 calendar days of receiving the information that a recordable has occurred.
- 7.3 Recordkeeping forms must be maintained for 5 years.
- 7.3.1 300,
- 7.3.2 300A,
- 7.3.3 301.
- 8 Annual Summary
- 8.1 Connie Holguin will examine the OSHA 300 log to ensure it is accurate.
- 8.1.1 Once found to be accurate Connie Holguin will then sign the OSHA 300A summary.
- 8.2 The annual summary will be posted at the main office in an easily spotted place.
- 8.3 The annual summary must not be:
- 8.3.1 Covered by other material,
- 8.3.2 Altered, or
- 8.3.3 Defaced.
- 8.4 The annual summary will be posted by February 1st of the year following the year covered by the records and the posting kept in place until April 30th.



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CHAPTER 22

1 Ladder Safety Program

- 1.1 Working on and around stairways and ladders is hazardous. Stairways and ladders are major sources of injuries and fatalities among construction workers for example, and many of the injuries are serious enough to require time off the job.
- 1.2 OSHA rules apply to all stairways and ladders used in construction, alteration, repair, painting, decorating and demolition of worksites covered by OSHA's construction safety and health standards.
- 1.3 JDM Janitorial Inc. has developed the following policy on Ladder Safety to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Certification training (Fall Protection, Ladders & Stairways).
- 2.2 PPE: Safety Vest, Fall protection, Work boots, Hard hats.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the use of ladders and stairways.

5 Ladders Safe Practices

- 5.1 Ladders used by the company's employees must meet the requirements of OSHA and ANSI.
- 5.2 Ladders must be capable of supporting the following loads without failure:

5.3 Each self-supporting portable ladder:

- 5.3.1 At least four times the maximum intended load, except that each extra-heavy-duty type 1A metal or plastic ladder must sustain at least 3.3 times the maximum intended load.
- 5.3.2 The ability of a ladder to sustain the loads will be determined by applying or transmitting the requisite load to the ladder in a downward vertical direction.

5.4 Each portable ladder that is not self-supporting:

5.4.1 At least four times the maximum intended load, except that each extra-heavy-duty type 1A metal or plastic ladders must sustain at least 3.3 times the maximum intended load.



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5.5 Non-self-supporting ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support). The angle is commonly known as a 4:1 ratio, which may be substituted for the language of one-quarter of the working length of the ladder.

5.6 Each fixed ladder:

- 5.6.1 At least two loads of 250 pounds (114 kg) each, concentrated between any two consecutive attachments (the number and position of additional concentrated loads of 250 pounds (114 kg) each, determined from anticipated usage of the ladder, must also be included), plus anticipated loads caused by ice buildup, winds, rigging, and impact loads resulting from the use of ladder safety devices.
- **5.6.2** Each step or rung must be capable of supporting a single concentrated load of at least 250 pounds (114 kg) applied in the middle of the step or rung.

5.7 Rungs, Cleats & Steps:

- 5.7.1 Ladder rungs, cleats, and steps s be parallel, level, and uniformly spaced when the ladder is in position for use.
- 5.7.2 Rungs, cleats, and steps of portable ladders (except as provided below) and fixed ladders (including individual-rung/step ladders) must be spaced not less than 10 inches (25 cm) apart, nor more than 14 inches (36 cm) apart, as measured between center lines of the rungs, cleats, and steps.
- 5.7.3 Rungs, cleats, and steps of step stools must be not less than 8 inches (20 cm) apart, nor more than 12 inches (31 cm) apart, as measured between center lines of the rungs, cleats, and steps.
- 5.7.4 Rungs, cleats, and steps of the base section of extension trestle ladders must not be less than 8 inches (20 cm) nor more than 18 inches (46 cm) apart, as measured between center lines of the rungs, cleats, and steps. The rung spacing on the extension section of the extension trestle ladder must be not less than 6 inches (15 cm) nor more than 12 inches (31 cm), as measured between center lines of the rungs, cleats, and steps.
- 5.7.5 The minimum clear distance between the sides of individual-rung/step ladders and the minimum clear distance between the side rails of other fixed ladders must be 16 inches (41 cm).
- 5.7.6 The minimum clear distance between side rails for all portable ladders must be 11 1/2 inches (29 cm).
- 5.7.7 The rungs of individual-rung/step ladders must be shaped such that employees' feet cannot slide off the end of the rungs.



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- 5.7.8 The rungs and steps of fixed metal ladders manufactured after March 15, 1991, must be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.
- 5.7.9 The rungs and steps of portable metal ladders must be corrugated, knurled, dimpled, coated with skid-resistant material, or otherwise treated to minimize slipping.
- 5.8 Ladders must not be tied or fastened together to provide longer sections unless they are specifically designed for such use.
- 5.9 A metal spreader or locking device must be provided on each stepladder to hold the front and back sections in an open position when the ladder is being used.
- 5.10 Ladder components must be surfaced so as to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.
- 5.11 Wood ladders must not be coated with any opaque covering, except for identification or warning labels which may be placed on one face only of a side rail.
- 5.12 When portable ladders are used for access to an upper landing surface, the ladder side rails must extend at least 3 feet (.9 m) above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder must be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grabrail, must be provided to assist employees in mounting and dismounting the ladder. In no case must the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support.
- 5.13 Ladders must be maintained free of oil, grease, and other slipping hazards.
- 5.14 Ladders must not be loaded beyond the maximum intended load for which they were built, nor beyond their manufacturer's rated capacity.
- 5.15 Ladders must be used only for the purpose for which they were designed.
- 5.16 Non-self-supporting ladders must be used at an angle such that the horizontal distance from the top support to the foot of the ladder is approximately one-quarter of the working length of the ladder (the distance along the ladder between the foot and the top support).
- 5.17 Wood job-made ladders with spliced side rails must be used at an angle such that the horizontal distance is one-eighth the working length of the ladder.
- 5.18 Fixed ladders must be used at a pitch no greater than 90 degrees from the horizontal, as measured to the back side of the ladder.
- 5.19 Ladders must be used only on stable and level surfaces unless secured to prevent accidental displacement.



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- 5.20 Ladders must not be used on slippery surfaces unless secured or provided with slip-resistant feet to prevent accidental displacement. Slip-resistant feet must not be used as a substitute for care in placing, lashing, or holding a ladder that is used upon slippery surfaces including, but not limited to, flat metal or concrete surfaces that are constructed so they cannot be prevented from becoming slippery.
- 5.21 Ladders placed in any location where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, must be secured to prevent accidental displacement, or a barricade must be used to keep the activities or traffic away from the ladder.
- 5.22 The area around the top and bottom of ladders must be kept clear.
- 5.23 The top of a non-self-supporting ladder must be placed with the two rails supported equally unless it is equipped with a single support attachment.
- 5.24 Ladders must not be moved, shifted, or extended while occupied.
- 5.25 Ladders must have nonconductive siderails if they are used where the employee or the ladder could contact exposed energized electrical equipment.
- 5.26 The top or top step of a stepladder must not be used as a step.
- 5.27 Cross-bracing on the rear section of stepladders must not be used for climbing unless the ladders are designed and provided with steps for climbing on both front and rear sections.
- 5.28 Ladders must be inspected by a competent person for visible defects prior to initial use in each work shift and after any occurrence that could affect their safe use.
- 5.29 Portable and fixed ladders with structural defects, such as, but not limited to, broken or missing rungs, cleats, or steps, broken or split rails, corroded components, or other faulty or defective components, must either be immediately marked in a manner that readily identifies them as defective, or be tagged with "Do Not Use" or similar language, and must be withdrawn from service until repaired.
- 5.29.1 Immediately tagged with "Do Not Use" or similar language,
- 5.29.2 Marked in a manner that readily identifies it as defective;
- 5.29.3 Or blocked (such as with a plywood attachment that spans several rungs).
- 5.29.4 Ladder repairs must restore the ladder to a condition meeting its original design criteria, before the ladder is returned to use.
- 5.30 Single-rail ladders must not be used.
- 5.31 When ascending or descending a ladder, the user must face the ladder.
- 5.32 Each employee must use at least one hand to grasp the ladder when progressing up and/or down the ladder.
- 5.33 An employee must not carry any object or load that could cause the employee to lose balance and fall.



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6 Ladder Safety Work Practices

- 6.1 Falls from portable ladders (step, straight, combination and extension) are one of the leading causes of occupational fatalities and injuries.
- 6.1.1 Read and follow all labels/markings on the ladder.
- 6.1.2 Avoid electrical hazards! Look for overhead power lines before handling a ladder. Avoid using a metal ladder near power lines or exposed energized electrical equipment.
- 6.1.3 Always inspect the ladder prior to using it. If the ladder is damaged, it must be removed from service and tagged until repaired or discarded.
- 6.1.4 Always maintain a 3-point (two hands and a foot, or two feet and a hand) contact on the ladder when climbing. Keep your body near the middle of the step and always face the ladder while climbing (see diagram).
- 6.1.5 Only use ladders and appropriate accessories (ladder levelers, jacks or hooks) for their designed purposes.
- 6.1.6 Ladders must be free of any slippery material on the rungs, steps or feet.
- 6.1.7 Do not use a self-supporting ladder (e.g., step ladder) as a single ladder or in a partially closed position.
- 6.1.8 Do not use the top step/rung of a ladder as a step/rung unless it was designed for that purpose.
- 6.1.9 Use a ladder only on a stable and level surface, unless it has been secured (top or bottom) to prevent displacement.
- 6.1.10 Do not place a ladder on boxes, barrels or other unstable bases to obtain additional height.
- 6.1.11 Do not move or shift a ladder while a person or equipment is on the ladder.
- 6.1.12 An extension or straight ladder used to access an elevated surface must extend at least 3 feet above the point of support (see diagram). Do not stand on the three top rungs of a straight, single or extension ladder.
- 6.1.13 The proper angle for setting up a ladder is to place its base a quarter of the working length of the ladder from the wall or other vertical surface (see diagram).
- 6.1.14 A ladder placed in any location where it can be displaced by other work activities must be secured to prevent displacement or a barricade must be erected to keep traffic away from the ladder.
- 6.1.15 Be sure that all locks on an extension ladder are properly engaged.
- 6.1.16 Do not exceed the maximum load rating of a ladder. Be aware of the ladder's load rating and of the weight it is supporting, including the weight of any tools or equipment.



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7 Stairways & Temporary Service

- 7.1 Stairways shall be at least 24 inches in width and shall be equipped with handrails, treads, and landings.
- 7.2 Temporary stairs shall have a landing not less than 30 inches in width in the direction of travel at each floor or landing, one landing for every 12 feet of vertical use.
- 7.3 Stairs shall be installed between 30 degrees and 50 degrees from horizontal.
- 7.4 Stairway, ramp, or ladders shall be provided at elevation of 18 inches or more in a frequently traveled passageway, entry, or exit.
- 7.5 A minimum of one (1) stairway shall be provided for access and exit for elevation at 36 feet. Elevation greater than 36 feet shall be equipped with two (2) stairways.
- 7.6 Handrails shall be 30-34 inches above the tread nosing, constructed in a substantial manner, and free from protruding nails and splinters.
- 7.7 Uprights and rail cross section shall not be less than 2 inches by 4 inches, or equivalent. Mid rails shall be provided between top rail of stair rail system and the stairway steps.
- 7.8 Railings and toeboards shall be installed around stairwells. Lighting in the stairwells shall provide five (5) foot candles of light on the steps.
- 7.9 Stairway and landings shall be clear of debris, loose material, and equipment not in use. Materials shall not be stored under stairwell.
- 7.10 Slippery conditions shall be eliminated on stairways prior to employee use. Stairway shall be free of hazardous projections. Stair rails systems and handrails shall be surfaced to prevent injury to employees.
- 7.11 Directional signs shall be posted to indicate stairway location.
- 7.12 Except during stairway construction, foot traffic is prohibited on stairways with pan steps where the treads and/or landings are to be filled in with concrete or other materials at a later date, unless the stairs are temporarily fitted with wood or other solid material at least to the top edge of each pan.
- 7.13 Such temporary treads and landings shall be replaced when worn below the level of the top edge of the pan.
- 7.14 Except during stairway construction, foot traffic is prohibited on skeleton metal stairs where permanent treads and/or landings are to be installed at a later date, unless the stairs are fitted with secured temporary treads and landings long enough to cover the entire tread and/or landing area.
- 7.15 11. Treads for temporary service shall be made of wood or other solid material and shall be installed the full width and depth of the stair.



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CHAPTER 23

1 Lead Awareness Program

- 1.1 Inorganic lead is a malleable, blue-gray, heavy metal that occurs naturally in the Earth's crust.
- 1.2 Lead was one of the first metals used by humans and consequently, the cause of the first recorded occupational disease (lead colic in a 4th century BC metal worker).
- 1.3 In 2012,U.S. production of lead was estimated at 1.6 million metric tons; primarily from secondary refining of scrap metal. U.S. mines produced 342,000 metric tons, ranking third in the world behind China and Australia.
- 1.4 The U.S. has 14 lead producing plants that account for 99% of U.S. secondary production. Lead can be used as a pure metal, combined with another metal to form an alloy, or in the form of a chemical compound. The primary use of lead in the U.S. is for automobile lead-acid storage batteries, a type of rechargeable electric battery which uses an almost pure lead alloy.
- 1.4.1 Lead-formed alloys are typically found in ammunition, pipes, cable covering, building material, solder, radiation shielding, collapsible tubes, and fishing weights.
- 1.5 Lead is also used in ceramic glazes and as a stabilizer in plastics.
- 1.6 Lead was used extensively as a corrosion inhibitor and pigment in paints but concerns over its toxicity led to the <u>CPSC</u> in 1977 to ban the use of lead in paint for residential and public buildings.
- 1.7 Prior to the mid-1980s, the organic lead compounds tetramethyl lead and tetraethyl lead were used as an antiknock additive and octane booster in gasoline but environmental exposure concerns resulted in the gradual phase-out of leaded gasoline in the United States. Organic lead compounds continue to be used in high octane fuel in the aviation industry for piston engine aircraft.
- 1.8 Lead enters the body primarily through inhalation and ingestion.
- 1.8.1 Today, adults are mainly exposed to lead by breathing in lead-containing dust and fumes at work, or from hobbies that involve lead.
- 1.8.2 Lead passes through the lungs into the blood where it can harm many of the body's organ systems.
- 1.8.3 While inorganic lead does not readily enter the body through the skin, it can enter the body through accidental ingestion (eating, drinking, and smoking) via contaminated hands, clothing, and surfaces.
- 1.8.4 Workers may develop a variety of ailments, such as neurological effects, gastrointestinal effects, anemia, and kidney disease.



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1 Lead Awareness Program Continued

1.9 JDM Janitorial Inc. has developed the following policy on Lead Awareness to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Health Effects of Lead

- 2.1 **Pain areas:** The abdomen or joints.
- 2.2 Gastrointestinal: Constipation, nausea, or vomiting.
- 2.3 **Developmental:** Learning disability or slow growth.
- 2.4 Whole body: Fatigue or loss of appetite.
- 2.5 **Behavioral:** Hyperactivity or irritability.
- 2.6 Also common: Baby colic, headache, insomnia, or memory loss.
- 2.7 Long term (chronic) overexposure to lead may result in severe damage to the blood-forming, nervous, urinary, and reproductive systems.

3 Implementation

- 3.1 Training: Safety meeting. Certification training.
- 3.2 PPE: Safety vest, Work gloves, Face shield, Work boots, Vented goggles, Coveralls

4 Competent Person

4.1 Connie Holguin is the competent person responsible for the program.

5 Training

- 5.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the risk of contacting lead containing materials but not disturbing the material during their work activities.
- 5.1.1 The training must be completed during orientation or prior to first work assignment in areas where the risk of Lead exposure exists.
- 5.1.2 Training must be conducted annually thereafter.
- 5.2 The training will be documented to include:
- 5.2.1 Names of employees trained,
- 5.2.2 Date the training took place,
- 5.2.3 Trainers name and signature.



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6 Lead Containing Material

- 6.1 It is a requirement of JDM Janitorial Inc. that employees must always obey all:
- 6.1.1 Signage,
- 6.1.2 Barricades,
- 6.1.3 Labels or
- 6.1.4 Jobsite assessment reports indicating the presence of lead containing materials.
- 6.2 This is to ensure that No Lead containing materials are disturbed.
- 6.3 If contact is made with lead materials the employees is to wash hands and face immediately.

7 Possible Location of Lead Containing Materials

Batteries	Leaded Glass
Pipes	Circuit Boards
Leaded Paints	Demo/Salvage Work
Leaded Solder	Cathode Ray Tubes

8 Multiple Contactor Worksites

- 8.1 In the instance that JDM Janitorial Inc. employees are working immediately adjacent to a lead abatement activity and are exposed to lead due to the inadequate containment of such job.
- 8.1.1 JDM Janitorial Inc. will remove its employees from the area until the problem is resolved or an initial assessment is completed.

JDM Janitorial Inc. Lead Awareness Reference: 29 CFR 1926.62, 1910.1025 Safety Coordinator Connie Holguin Phone Number (682) 404-7711 Revision Date 11/1/2021



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CHAPTER 24

1 Lockout / Tagout Program

- 1.1 Energy sources including electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other sources in machines and equipment can be hazardous to workers. During the servicing and maintenance of machines and equipment, the unexpected startup or release of stored energy can result in serious injury or death to workers.
- 1.2 Workers servicing or maintaining machines or equipment may be seriously injured or killed if hazardous energy is not properly controlled. Injuries resulting from the failure to control hazardous energy during maintenance activities can be serious or fatal! Injuries may include electrocution, burns, crushing, cutting, lacerating, amputating, or fracturing body parts, and others. For example:
- 1.2.1 A steam valve is automatically turned on burning workers who are repairing a downstream connection in the piping.
- 1.2.2 A jammed conveyor system suddenly releases, crushing a worker who is trying to clear the jam.
- 1.2.3 Internal wiring on a piece of factory equipment electrically shorts, shocking worker who is repairing the equipment.
- 1.3 Craft workers, electricians, machine operators, and laborers are among the 3 million workers who service equipment routinely and face the greatest risk of injury. Workers injured on the job from exposure to hazardous energy lose an average of 24 workdays for recuperation.
- 1.4 JDM Janitorial Inc. has developed the following policy on Lockout / Tagout to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.
- 1.5 The objective of this procedure is to establish a means of positive control to prevent the accidental starting or activating of machinery or systems while they are being repaired, cleaned and/or serviced. This program serves to:
- 1.5.1 Establish a safe and positive means of shutting down machinery, equipment and systems.
- 1.5.2 Prohibit unauthorized personnel or remote-control systems from starting machinery or equipment while it is being serviced.
- 1.5.3 Provide a secondary control system (tagout) when it is impossible to positively lockout the machinery or equipment.
- 1.5.4 Establish responsibility for implementing and controlling lockout/tagout procedures.



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- 1.5.5 Ensure that only approved locks, standardized tags and fastening devices provided by the company will be utilized in the lockout/tagout procedures.
- 1.5.6 Ensure devices indicate the identity of the employee applying the device.
- 1.5.7 Ensure lockout and tagout devices meet the following requirements: durable, standardized, substantial, and identifiable.

2 Implementation

- 2.1 Training: Safety meeting, Certification training.
- 2.2 PPE: Safety vest, locks, tags, work gloves, safety goggles, hard hats, work boots.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Each authorized employee of JDM Janitorial Inc. who will be utilizing the lockout/tagout procedure will be trained in the recognition of applicable hazardous energy sources, type and magnitude of energy available in the work place, and the methods and means necessary for energy isolation and control.
- 4.2 Each affected employee (all employees other than authorized employees utilizing the lockout/tagout procedure) will be instructed in the purpose and use of the lockout/tagout procedure, and the prohibition of attempts to restart or re-energize machines or equipment that are locked out or tagged out.
- 4.3 Training will be provided when there is a change in the following:
- 4.3.1 Job assignments,
- 4.3.2 Machinery or processes that present a new hazard, or
- 4.3.3 Energy-control procedures.
- 4.4 Retraining also is necessary whenever a periodic inspection reveals, or JDM Janitorial Inc. has reason to believe, that shortcomings exist in an employee's knowledge or use of the energy-control procedure.
- 4.4.1 Training will be documented to include names/dates and kept on file.
- 4.4.2 Additional retraining shall be conducted whenever a periodic inspection reveals, or whenever the employer has reason to believe, that there are deviations from or inadequacies in the employee's knowledge or use of the energy control procedures.



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5 Assignment of Responsibility

- 5.1 Primary responsibility is vested in an authorized employee. The authorized employee ascertains the exposure status of group members. Each authorized employee shall affix a personal LOTO device and remove those devices when he/she stops working on the machine or equipment being services or maintained.
- 5.2 Connie Holguin will be responsible for implementing the lockout/tagout program.
- 5.3 The supervisors are responsible for enforcing the program and insuring compliance with the procedures in their departments.
- 5.4 Connie Holguin is responsible for monitoring the compliance of this procedure and will conduct the annual inspection and certification of the authorized employees.
- 5.5 <u>Authorized employees (those listed in the list of authorized personnel attachment in this program)</u> are responsible for following established lockout/tagout procedures.
- 5.5.1 The Primary responsibility is vested in the authorized employee.
- 5.5.2 The authorized employee ascertains the exposure status of group members.
- 5.5.3 Each authorized employee must affix a personal LOTO device and remove those devices when he/she stops working on the machine or equipment being services or maintained.
- 5.6 <u>Affected employees</u> (all other employees in the facility) are responsible for insuring they do not attempt to restart or re-energize machines or equipment that are locked out or tagged out.
- 5.7 Affected employees will be notified by an authorized employee of the application and removal of lockout devices or tagout devices.
- 5.8 Notification will be given before the controls are applied, and after they are removed from the machine or equipment.

6 Procedures

- 6.1 It is a requirement of JDM Janitorial Inc. that lockout or tagout must be performed only by the authorized employees who are performing the servicing or maintenance.
- 6.2 The ensuing items are to be followed to ensure both compliance with the OSHA Control of Hazardous Energy Standard and the safety of our employees.

6.3 **Preparation for Lockout or Tagout**

- 6.3.1 Before an authorized or affected employee turns off a machine or equipment, the authorized employee shall have knowledge of the type & magnitude of the energy, the hazards of the energy to be controlled, & the methods or means to control the energy.
- 6.3.2 Employees who are required to utilize the lockout/tagout procedure must be knowledgeable of the different energy sources and the proper sequence of shutting off or disconnecting energy means. The four types of energy sources are:



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- 6.3.2.1 Electrical (most common form),
- 6.3.2.2 Hydraulic or pneumatic,
- 6.3.2.3 Fluids and gases, and
- 6.3.2.4 Mechanical (including gravity).
- 6.4 More than one energy source may be utilized on some equipment and the proper procedure must be followed in order to identify energy sources and lockout/tagout accordingly. (See attached specific procedure format list.)
- 6.5 Following the application of lockout/tagout devices to energy isolating devices, all potentially hazardous stored or residual energy shall be relieved, disconnected, restrained or otherwise rendered safe. If there is a possibility of re-accumulation of stored energy, verification of isolation shall be continued until the servicing or maintenance is completed, or until the possibility of such accumulation no longer exists.
- 6.6 Prior to starting work on machines or equipment that have been locked or tagged out, the authorized employee shall verify that isolation & deenergization of the machine or equipment have been accomplished.
- 6.7 All energy isolating devices that are needed to control the energy to the machine or equipment shall be physically located & operated in such a manner as to isolate the machine or equipment from the energy source.
- 6.8 Machine or equipment shall be turned off or shutdown using the procedures established for the machine or equipment. An orderly shutdown must be utilized to avoid any additional or increased hazard(s) to employees as a result of the equipment stoppage.

6.9 **Procedures for Electrical**

- 6.9.1 Shut off power at machine and disconnect.
- 6.9.2 Disconnecting means must be locked or tagged.
- 6.9.3 Press start button to see that correct systems are locked out.
- 6.9.4 All controls must be returned to their safest position.
- 6.9.5 Points to remember:
- 6.9.5.1 If a machine or piece of equipment contains capacitors, they must be drained of stored energy.
- 6.9.5.2 Possible disconnecting means include the power cord, power panels (look for primary and secondary voltage), breakers, the operator's station, motor circuit, relays, limit switches, and electrical interlocks.
- 6.9.5.3 Some equipment may have a motor isolating shut-off and a control isolating shut-off.



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6.9.5.4 If the electrical energy is disconnected by simply unplugging the power cord, the cord must be kept under the control of the authorized employee or the plug end of the cord must be locked out or tagged out.

6.10 **Procedures for Hydraulic/Pneumatic**

- 6.10.1 Shut off all energy sources (pumps and compressors). If the pumps and compressors supply energy to more than one piece of equipment, lockout or tagout the valve supplying energy to the piece of equipment being serviced.
- 6.10.2 Stored pressure from hydraulic/pneumatic lines shall be drained/bled when release of stored energy could cause injury to employees.
- 6.10.3 Make sure controls are returned to their safest position (off, stop, standby, inch, jog, etc.).

6.11 **Procedures for Fluids and Gases**

- 6.11.1 Identify the type of fluid or gas and the necessary personal protective equipment.
- 6.11.2 Close valves to prevent flow, and lockout/tagout.
- 6.11.3 Determine the isolating device, then close and lockout/tagout.
- 6.11.4 Drain and bleed lines to zero energy state.
- 6.11.5 Some systems may have electrically controlled valves. If so, they must be shut off and locked/tagged out.
- 6.11.6 Check for zero energy state at the equipment.

6.12 **Procedures for Mechanical Energy**

- 6.12.1 Mechanical energy includes gravity activation, energy stored in springs, etc.
- 6.12.1.1 Block out or use die ram safety chain.
- 6.12.1.2 Lockout or tagout safety device.
- 6.12.1.3 Shut off, lockout or tagout electrical system.
- 6.12.1.4 Check for zero energy state.
- 6.12.1.5 Return controls to safest position.

6.13 **Procedures for Release from Lockout/Tagout**

- 6.13.1 Inspection: Make certain the work is completed and inventory the tools and equipment that were used.
- 6.13.2 Clean-up: Remove all towels, rags, work-aids, etc.
- 6.13.3 Replace guards: Replace all guards possible. Sometimes a particular guard may have to be left off until the start sequence is over due to possible adjustments. However, all other guards should be put back into place.
- 6.13.4 Check controls: All controls should be in their safest position.



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6.13.5 The work area shall be checked to ensure that all employees have been safely positioned or removed and notified that the lockout/tagout devices are being removed.

6.13.6 Remove locks/tags. Remove only your lock or tag.

6.14 Procedures for Service or Maintenance Involving More than One Person

6.14.1 When servicing and/or maintenance is performed by more than one person, each authorized employee will place his own lock or tag on the energy isolating source. This will be done by utilizing a multiple lock scissors clamp if the equipment is capable of being locked out. If the equipment cannot be locked out, then each authorized employee must place his tag on the equipment.

6.15 Procedures for Removal of an Authorized Employee's Lockout/Tagout by the Company

- 6.15.1 Each location must develop written emergency procedures that comply with 1910.147(e)(3) to be utilized at that location. Emergency procedures for removing lockout/tagout should include the following:
- 6.15.1.1 Verification by employer that the authorized employee who applied the device is not in the facility.
- 6.15.1.2 Make reasonable efforts to advise the employee that his/her device has been removed. (This can be done when he/she returns to the facility).
- 6.15.1.3 Ensure that the authorized employee has this knowledge before he/she resumes work at the facility.

6.16 Group Lockout

- 6.16.1 Each employee must affix his/her personal LOTO device to the group lockout/tagout device before engaging in the servicing and maintenance operation.
- 6.16.2 The supervisor in charge of the group lockout/tagout must not remove the group LOTO device until each employee in the group has removed his/her personal device.

6.17 Shift or Personnel Changes

- 6.17.1 Each facility must develop written procedures based on specific needs and capabilities. Each procedure must specify how the continuity of lockout or tagout protection will be ensured at all times.
- 6.17.2 Connie Holguin or their designee will ascertain the exposure status of individual group members.
- 6.17.3 Each employee will attach a personal lockout or tagout device to the group's device while he/she is working & then remove it when finished.



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6.18 **Procedures for Outside Personnel/Contractors**

- 6.18.1 Outside personnel/contractors shall be advised that the company has and enforces the use of lockout/tagout procedures. They will be informed of the use of locks and tags and notified about the prohibition of attempts to restart or re-energize machines or equipment that are locked out or tagged out.
- 6.18.2 The company will obtain information from the outside personnel/contractor about their lockout/tagout procedures and advise affected employees of this information.
- 6.18.3 The outside personnel/contractor will be required to sign a certification form (see Attachment). If outside personnel/contractor has previously signed a certification that is on file, additional signed certification is not necessary.

7 Periodic Inspection

- 7.1 A periodic inspection (at least annually) will be conducted of each authorized employee under the lockout/tagout procedure.
- 7.2 This inspection will be performed by Connie Holguin.
- 7.2.1 If Connie Holguin is also using the energy control procedure being inspected, then the inspection shall be performed by another party.
- 7.3 The inspection will include a review between the inspector and each authorized employee of that employee's responsibilities under the energy control (lockout/tagout) procedure. The inspection will also consist of a physical inspection of the authorized employee while performing work under the procedures.
- 7.4 Connie Holguin will certify in writing that the inspection has been performed. The written certification (Attachment) shall be retained in the individual's personnel file.

8 Lockout Tagout Devices

- 8.1 Lockout devices and tagout devices shall be singularly identified; shall be the only devices(s) used for controlling energy; shall not be used for other purposes; and shall meet the following requirements:
- 8.1.1 Durable Lockout and tagout devices must be capable of withstanding the environment to which they are exposed for the maximum period of time that exposure is expected.
- 8.1.1.1 Tagout devices must be constructed and printed so that exposure to weather conditions or wet and damp locations will not cause the tag to deteriorate or the message on the tag to become illegible.
- 8.1.1.2 Tags must not deteriorate when used in corrosive environments such as areas where acid and alkali chemicals are handled and stored.



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- 8.1.1.3 Standardized Lockout and tagout devices must be standardized within the facility in at least one of the following criteria:
- 8.1.1.4 Color; shape; or size; and additionally, in the case of tagout devices, print and format shall be standardized.
- 8.1.1.5 Substantial Lockout devices must be substantial enough to prevent removal without the use of excessive force or unusual techniques, such as with the use of bolt cutters or other metal cutting tools.
- 8.1.1.6 Tagout devices, including their means of attachment, must be substantial enough to prevent inadvertent or accidental removal.
- 8.1.1.7 Tagout device attachment means must be of a non-reusable type, attachable by hand, selflocking, and non-releasable with a minimum unlocking strength of no less than 50 pounds and having the general design and basic characteristics of being at least equivalent to a one-piece, all environment-tolerant nylon cable tie.
- 8.1.2 Identifiable Lockout devices and tagout devices must indicate the identity of the employee applying the device(s).
- 8.2 It is a requirement of JDM Janitorial Inc. that lockout or tagout devices must be affixed to each energy isolating device by authorized employees.
- 8.2.1 Lockout devices, where used, must be affixed in a manner that will hold the energy isolating devices in a safe or off position.
- 8.2.2 Tagout devices, where used, must be affixed in such a manner as will clearly indicate that the operation or movement of energy isolating devices from the safe or off position.
- 8.2.3 Where tagout devices are used with energy isolating devices designed with the capability of being locked, the tag attachment must be fastened at the same point at which the lock would have been attached.
- 8.2.4 Where a tag cannot be affixed directly to the energy isolating device, the tag must be located as close as safely as possible to the device in a position that will be immediately obvious to anyone attempting to operate the device.

9 Testing or Positioning of Machines, Equipment or Components

- 9.1 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 components, the following sequence of actions must be followed:
- 9.1.1 Clear the machine or equipment of tools and materials,
- 9.1.2 Remove employees from the machine or equipment area,
- 9.1.3 Remove the lockout or tagout devices,
- 9.1.4 Energize and proceed with testing or positioning,



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9.1.5 Deenergize all systems and reapply energy control measures.

10 List of Authorized Personnel for Lockout/Tagout Procedures

Name	Job Title

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11 Certification of Training (Authorized Personnel)

I certify that I received training as an authorized employer under JDM Janitorial Inc. 's Lockout/Tagout program. I further certify that I understand the procedures and will abide by those procedures.

AUTHORIZED EMPLOYEE SIGNATURE

DATE

A JANITOR	JDM Janitorial Inc.			
A A A A A A A A A A A A A A A A A A A	Lockout / Tagout	Reference: 29 CFR 1910.147		
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12 Certification of Training (Affected Personnel)

I certify that I received training as an Affected Employee under JDM Janitorial Inc.'s Lockout/Tagout Program. I further certify and understand that I am prohibited from attempting to restart or re-energize machines or equipment that are locked out or tagged out.

AUTHORIZED EMPLOYEE SIGNATURE

DATE

ANITORIAL WALL	JDM Janitorial Inc.			
	Lockout / Tagout	Reference: 29 CFR 1910.147		
	Safety Coordinator	Connie Holguin		
	Phone Number	(682) 404-7711		LW
	Revision Date	11/1/2021		COMPLIANCE MANAGEMENT SERVICE RUL SAFETY, ALL THE TIME

13 Lockout/Tagout Inspection Certification

I certify that <u>Equipment</u> was inspected on this date utilizing lockout/tagout procedures. The

inspection was performed while working on

Equipment

AUTHORIZED EMPLOYEE SIGNATURE

DATE

A JANITOP	JDM Janit	torial Inc.		
× ×	Lockout / Tagout	Reference: 29 CFR 1910.	147	
A BOTINAL A	Safety Coordinator	Connie Holguin		
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14 Outside Personnel/Contractor Certification

I certify that ______ and _____ (outside personnel/contractor)

have informed each other of our respective lockout/tagout procedures.

AUTHORIZED EMPLOYEE SIGNATURE

DATE

INSPECTOR SIGNATURE

DATE

ANITOR P	JDM Janito	orial Inc.		
₩ * (¥)**	Lockout / Tagout	Reference: 29 CFR 1910.1	17	
14 6 5	Safety Coordinator	Connie Holguin		
ADTINAL A	Phone Number	(682) 404-7711		LWG
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15 Equipment Specific Procedure for JDM Janitorial Inc.

(Date)

– 15.1 Machine Identification	
General Description:	
Manufacturer:	
Model Number:	
Serial Number:	
* If more than one piece of same equipment	

15.2 Location of equipment:

15.3 Operator Controls

The types of controls available to the operator need to be determined. This should help identify energy sources and lockout capacity for the equipment.

List types of operator controls: ______

ANITOR PL * CONTRACT

JDM Janitorial Inc.

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16 Energy Sources

16.1 The energy sources, such as electrical, steam, hydraulic, pneumatic, natural gas, stored energy, etc.) present on this equipment are:

ENERGY SOURCE	LOCATION	Lock Yes	able No	Type lock or block needed



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17 Shutdown Procedures

17.1 List the steps in order necessary to shut down and de-energize the equipment.

17.2 Be specific. For stored energy, be specific about how the energy will be dissipated or restrained.

NOTIFY ALL AFFECTED EMPLOYEES WHEN THIS PROCEDURE IS IN APPLICATION.

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JDM Janitorial Inc.

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18 Start Up Procedures

List the steps in order necessary to reactivate (energize) the equipment. Be specific.

Procedure: _____

Energy Source Activated: _____

NOTIFY ALL AFFECTED EMPLOYEES WHEN THIS PROCEDURE IS IN APPLICATION.



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19 Procedures for Operations and Service/Maintenance

19.1 List those operations where the procedures above do not apply [See 29 CFR 1910.147 (a)(2)]. Alternate measures which provide effective protection must be developed for these operations. Job Safety Analysis is one method of determining appropriate measures.

Operation Name: ______





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20 Affected and Authorized Employees

List each person affected by this procedure and those authorized to use this procedure.

AFFECTED EMPLOYEES			
Name	Job Title		
AUTHORIZED EMPLOYE	ES		
Name	Job Title		

Approved by

Date

Approved by

Date

JDM Janitorial Inc. Lockout / Tagout Reference: 29 CFR 1910.147 Safety Coordinator Connie Holguin Phone Number (682) 404-7711 Revision Date 11/1/2021



	Manual Lifting	Reference: www.OSHA.gov	~
ļ	Safety Coordinator	Connie Holguin	
	Phone Number	(682) 404-7711	
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CHAPTER 25

1 Manual Lifting Program

- 1.1 Lifting heavy items is one of the leading causes of injury in the workplace.
- 1.1.1 In 2001, the Bureau of Labor Statistics reported that over 36 percent of injuries involving missed workdays were the result of shoulder and back injuries.
- 1.1.2 Over-exertion and cumulative trauma were the biggest factors in these injuries.
- 1.2 JDM Janitorial Inc. has developed the following policy on Manual Lifting to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, back braces, steel toed boots, work gloves, hard hats, eye & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the use of Manual Lifting.
- 4.2 Employees should know and understand potential hazards associated with moving materials manually including but not limited to the weight and bulkiness of object, awkward posture, high-frequency and long-duration lifting, inadequate handholds, and environmental factors.
- 4.3 How to recognize and avoid materials handling hazards and include: dangers of lifting without proper training, avoidance of unnecessary physical stress and strain, awareness of what a worker can comfortably handle, use of equipment properly, recognition of potential hazards and how to prevent or correct them.
- 4.4 Job specific training will be given to all employees, particularly on how to do their job with the least amount of risk.
- 4.5 Additionally, job specific training will be given on safe lifting and work practices, hazards, and controls.
- 4.6 Training will include
- 4.6.1 General principles of ergonomics,
- 4.6.2 Recognition of hazards and injuries,
- 4.6.3 Procedures for reporting hazardous conditions and
- 4.6.4 Methods and procedures for early reporting of injuries.



Manual Lifting	Reference: www.OSHA.gov	~
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5 Hazard Assessment

- 5.1 It is the policy of JDM Janitorial Inc. that a hazard assessment must be completed prior to any manual lifting is performed.
- 5.2 The assessment must consider:
- 5.2.1 Size,
- 5.2.2 Bulk and
- 5.2.3 Weight of the object(s),
- 5.2.4 If mechanical lifting equipment is required,
- 5.2.5 If two-man lift is required,
- 5.2.5.1 Where use of lifting equipment is impractical or not possible, two man lifts must be used.
- 5.2.6 Whether vision is obscured while carrying and
- 5.2.7 The walking surface and path where the object is to be carried.

6 Incident Investigation

- 6.1 It is the policy of JDM Janitorial Inc. that musculoskeletal injuries caused by improper lifting must be investigated and documented.
- 6.2 Incorporation of investigation findings into work procedures will be accomplished to prevent future injuries.

7 Evaluations

- 7.1 Supervision must periodically evaluate work areas and employees' work techniques to assess the potential for and prevention of injuries.
- 7.2 New operations will be evaluated to engineer out hazards before work processes are implemented.

8 Engineering Controls

- 8.1 Engineering controls such as work table height, ergonomic layout of the workplace, and use of lifts, jacks, and other machinery should be used to lessen the physical burden of lifting.
- 8.2 When other controls are not feasible, two man lifts must be used.

9 Manual Lifting Equipment

- 9.1 When moving materials manually, workers should attach handles or holders to loads. In addition, workers should wear appropriate personal protective equipment and use proper lifting techniques.
- 9.2 Manual lifting equipment will be provided for employees, such as:
- 9.2.1 Dollies,



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9.2.2 Hand trucks,

- 9.2.3 Lift-assist devices,
- 9.2.4 Jacks,
- 9.2.5 Carts and
- 9.2.6 Hoists.
- 9.3 Manual lifting equipment must be used instead of manual lifting where possible.
- 9.4 Supervisors must enforce the use of lifting equipment.



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Noise Exposure / Hearing Conservation	Reference: 29 CFR 1926.52, 1910.95	
Safety Coordinator	Connie Holguin	
Phone Number	(682) 404-7711	CMS
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CHAPTER 26

1 Noise Exposure Program

- Twenty-two million workers are exposed to potentially damaging noise at work each year. In 2016
 U.S. business paid more than \$1.5 million in penalties for not protecting workers from noise.
- 1.2 While it's impossible to put a number to the human toll of hearing loss, an estimated \$242 million is spent annually on workers' compensation for hearing loss disability.

1.3 Health Effects

- 1.3.1 Exposure to high levels of noise can cause permanent hearing loss. Neither surgery nor a hearing aid can help correct this type of hearing loss. Short term exposure to loud noise can also cause a temporary change in hearing (your ears may feel stuffed up) or a ringing in your ears (tinnitus). These short-term problems may go away within a few minutes or hours after leaving the noise. However, repeated exposures to loud noise can lead to permanent tinnitus and/or hearing loss.
- 1.3.2 Loud noise can create physical and psychological stress, reduce productivity, interfere with communication and concentration, and contribute to workplace accidents and injuries by making it difficult to hear warning signals. The effects of noise induced hearing loss can be profound, limiting your ability to hear high frequency sounds, understand speech, and seriously impairing your ability to communicate.
- 1.4 JDM Janitorial Inc. has developed the following policy on Noise Exposure / Hearing Conservation to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness Training
- 2.2 PPE: Ear plugs/muffs., safety vests

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Hearing Protection

- 4.1 Appropriate hearing protection will be provided at no cost and must be worn as specified by project supervisors. Hearing protection will be worn when it will provide greater safety and protection benefits.
- 4.2 Employees shall be given the opportunity to select their hearing protectors from a variety of suitable hearing protectors provided by the employer.
- 4.3 When working at a client's site, employees will adhere to the hearing protection requirements of either the client or JDM Janitorial Inc., whichever requirements are more stringent.



Noise Exposure /	Reference: 29 CFR 1926.52	2, 1910.95	
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- 4.4 The requirements outlined below are mandatory while working in this company's workshop or on its projects. They apply to all employees, visitors and contractors.
- 4.5 Only company-approved hearing protection will be used.
- 4.6 Hearing protection will be worn at all times when noise levels are suspected of equaling or exceeding 90 dBA.
- 4.7 When information indicates that employee exposure may equal/exceed the 8 hr time-weighted avg. of 85 decibels, a monitoring program will be implemented to identify employees to be included in the hearing conservation program.
- An audiometric testing program will be established and maintained by making audiometric testing available to all employees at no cost whose exposures equal or exceed an 8-hr. time-weighted avg.
 85 decibels.
- 4.9 Use of portable radios with earphones is prohibited at all times.

5 Identification of Noise Sources

- 5.1 Noise levels will be determined for all high-noise areas and equipment.
- 5.2 Representative monitoring will be performed to determine personnel exposures where appropriate.
- 5.3 Equipment or areas with noise levels equal to or exceeding 85 dBA will be identified with labels or signs, which will be posted on the individual pieces of equipment (whether owned and leased) or at the entrance to noisy areas.
- 5.4 The sign or label will state either "Hearing Protection Is Required While the Equipment Is Operating" or "Hearing Protection Is Required While Working in the Area" or similar wording, as appropriate.
- 5.5 Equipment typically requiring labels includes but is not limited to compressors, forklifts, generators and pneumatic tools.
- 5.6 Labels will be placed where the operator can readily see the warning, such as next to power switches.
- 5.7 The requirements of this policy will be included in specifications when purchasing, renting or leasing equipment.

6 Reduction of Noise Levels

- 6.1 Whenever practical, noise levels identified as exceeding 85 dBA will be reduced by means of engineering or administrative controls, including isolation, enclosure and application of noise-reduction materials.
- 6.2 Specific noise environments and noise reduction ratings (NRRs) must be considered when selecting the type of hearing protection (ear plugs, ear muffs or both) for a particular job.

7 Training

7.1 A current copy of the Occupational Noise Standard, 29 CFR 1926.52, will be posted in the company's main office. Copies will be made available to employees on request.



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- 7.2 Hearing protectors shall be replaced as necessary. JDM Janitorial Inc. shall provide training in the use and care of all hearing protectors and ensure proper initial fitting and supervise the correct use of all hearing protectors.
- 7.3 Once each calendar year, training will be conducted for all employees who may be exposed to noise levels of 85 dBA or greater.
- 7.3.1 At a minimum, the training program will include a discussion of the following:
- 7.3.1.1 The purpose of hearing protection.
- 7.3.1.2 The effectiveness, advantages and disadvantages of various types of hearing protection.
- 7.3.1.3 Pertinent noise-monitoring results.
- 7.3.1.4 Specific equipment and/or operations that produce high noise levels.
- 7.3.1.5 The purpose of audiometric testing and an explanation of testing procedures.
- 7.3.1.6 Training records will be kept at the main office and made available.

8 Responsibilities

- 8.1 Each employee is responsible for:
- 8.1.1 Following the instructions received in the training program.
- 8.1.2 Wearing proper hearing protection when needed.
- 8.1.3 Foremen and supervisors are responsible for ensuring:
- 8.1.4 Hearing protection is used in areas or operations where such use is required.
- 8.1.5 Affected employees receive appropriate training and participate in annual audiometry as required.
- 8.1.6 High-noise areas and equipment are identified and labeled accordingly.
- 8.2 Management is responsible for:
- 8.2.1 Determining whether noise reduction is feasible by means of engineering controls.
- 8.2.2 Ensuring adequate supplies of ear plugs or other well-maintained hearing protection devices are available.
- 8.2.3 Determining the adequacy of hearing-protection devices.
- 8.2.4 Assisting in training as necessary.
- 8.2.5 Coordinating and overseeing all audiometric testing.



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9 Baseline Audiogram

- 9.1 It is a requirement of JDM Janitorial Inc. that within 6 months of an employee's first exposure at or above the action level:
- 9.1.1 A valid baseline audiogram will be established, which future audiograms can be compared against.
- 9.1.2 When a mobile van is used, the baseline must be established within 1 yr.
- 9.2 Baseline audiogram testing will be done only after the employee has had 14 hours free from exposure to workplace noise.
- 9.2.1 Hearing protection may be used to meet the requirement.
- 9.2.2 Employees will also be notified to avoid high levels of noise.
- 9.3 JDM Janitorial Inc. will obtain a new audiogram for each employee exposed at or above an 8-hour time-weighted average of 85 decibels at least annually after obtaining the baseline audiogram.
- 9.3.1 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.
- 9.3.2 If a comparison of the annual audiogram to the baseline audiogram indicates a standard threshold shift, the employee shall be informed of this fact in writing, within 21 days of the determination.
- 9.4 Accurate records of all employee exposure and audiometric measurements shall be maintained as required by the regulation.

10 Hearing Protection Re-evaluation

- 10.1 Unless a physician determines that the standard threshold shift is not work related or aggravated by occupational noise exposure, JDM Janitorial Inc. will ensure that employees already using hearing protectors will be refitted and retrained in the use of hearing protectors and provided with hearing protectors offering greater attenuation if necessary.
- 10.2 The employee will be referred for a clinical audiological evaluation or an otological examination, as appropriate, if additional testing is necessary or if the employer suspects that a medical pathology of the ear is caused or aggravated by the wearing of hearing protectors.
- 10.3 It's a requirement of JDM Janitorial Inc. to evaluate hearing protector attenuation for the specific noise environments in which the protector will be used.

11 Hearing Conservation Checklist

- 11.1 Procedures to be taken.
- 11.1.1 Have all employees been monitored for exposure to noises?



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- 11.1.2 Do monitoring results indicate that employees are overexposed?
- 11.1.3 If testing indicates overexposure, circle the types of controls implemented:
- 11.1.3.1 Engineering
- 11.1.3.2 Administrative
- 11.1.3.3 Work Practices
- 11.1.4 Have employees been provided with hearing protectors?
- 11.1.5 If hearing protectors have been provided, circle the type being used. If multiple types are used, list employees and types being used in the space below.
- 11.1.5.1 Ear Muffs
- 11.1.5.2 Disposable Ear Plugs
- 11.1.5.3 Fitted Ear Plugs
- 11.1.6 Have employees been trained to understand noise hazards and the measures taken to control noise, including wearing protectors?
- 11.1.7 Have employees received baseline audiometry?
- 11.1.8 For those employees who have received a baseline, has an annual audiogram been given?
- 11.1.9 If an employee has suffered hearing loss, have procedures been developed to prevent further hearing loss from occurring?
- 11.1.10 Has a record-keeping system been developed to track information from physicians and training?

12 Awareness Training

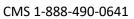
- 12.1 Training will be provided prior to initial assignment by JDM Janitorial Inc. for all employees who are exposed to a noise action level or work in high noise areas.
- 12.2 The training must be repeated annually for each employee.
- 12.3 Training will be updated consistent to changes in PPE and work processes and include the proper techniques of wearing hearing protection.

13 Change of Process

- 13.1 Monitoring must be repeated whenever a change in production, process, equipment or controls increases noise exposures to the extent that:
- 13.1.1 Additional employees may be exposed at or above the action level or the attenuation provided by hearing protectors being used by employees may be rendered inadequate.

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CHAPTER 27

1 Non-DOT Drug & Alcohol Program

- 1.1 It is the policy of JDM Janitorial Inc. that the use, sale, purchase, transfer, possession, or presence in one's system of any controlled substance (except medically prescribed drugs). by any employees while on the Company's premises, engaged in Company business, operating Company equipment, or while under the authority of the Company is strictly prohibited.
- 1.2 JDM Janitorial Inc. further maintains a policy that the unauthorized use, sale, purchase, transfer, possession, or presence in one's system of alcohol or any other intoxicating agent by any employee while on the Company's premises, engaged in Company business, operating Company equipment, or while under the authority of the Company is strictly prohibited.
- 1.3 There are many reasons why we have implemented a drug and alcohol testing program, they include but are not limited to:
- 1.3.1 Deter employees from abusing alcohol and drugs.
- 1.3.2 Prevent hiring individuals who use illegal drugs.
- 1.3.3 Be able to identify early and appropriately refer employees who have drug and/or alcohol problems.
- 1.3.4 Provide a safe workplace for employees.
- 1.3.5 Protect the general public and instill consumer confidence that employees are working safely.
- 1.3.6 Benefit from Workers' Compensation Premium and Group Discount programs.
- 1.3.7 Comply with State, Federal and Local laws and regulations.
- 1.4 JDM Janitorial Inc. has developed the following policy on Drug and Alcohol to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.
- 1.5 This policy applies to all employees of JDM Janitorial Inc..

2 Implementation

2.1 Training: Safety meeting, Awareness training.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.



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4 Records

- 4.1 All employee drug and alcohol test records are considered confidential.
- 4.2 Employee alcohol and controlled substance test records will only be released in the following situations:
- 4.2.1 To the active employee, upon their request,
- 4.2.2 Upon written consent by the employee authorizing the release to a specified individual,
- 4.2.3 Upon request of state or local officials with regulatory authority over the Company,
- 4.2.4 Upon request of the United States Secretary of Transportation,
- 4.2.5 Upon request by the National Transportation Safety Board (NTSB) as part of an accident investigation,
- 4.2.6 In a lawsuit, grievance, or other proceeding when legally applicable,
- 4.2.7 Upon request by subsequent employers upon receipt of a written request by an employee.

5 Testing

5.1 Employees of JDM Janitorial Inc. may be subject to each of the following types of drug and alcohol tests:

5.2 **Pre-Employment (drug only)**

5.2.1 Employees will be subject to a drug test prior to employment. No employee will be permitted to perform any safety-sensitive function, including the driving of any company vehicle, until they have received a negative drug test result.

5.3 Post-Accident

- 5.3.1 In the event of an accident involving a commercial motor vehicle operating on a public road in commerce, the involved employee will be subject to a drug and alcohol test in the following circumstances:
- 5.3.1.1 If the accident involved the loss of human life;
- 5.3.1.2 If the employee receives a citation for a moving traffic violation arising from the accident, and the accident involves either:
- 5.3.1.2.1 Bodily injury to any person who immediately receives medical treatment away from the scene of the accident; or
- 5.3.1.2.2 One or more motor vehicles incurring disabling damage requiring the motor vehicle to be transported away from the scene by tow.



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5 Testing Continued

5.4 Random

5.4.1 Employees will be subject to random drug and alcohol testing. Random testing will be conducted without notice to randomly selected employees. Employees may be grouped into drug and alcohol testing pools based on job function. All employees within each pool have an equal chance of testing.

5.5 Reasonable Suspicion

5.5.1 Employees will be subject to reasonable suspicion drug and alcohol testing if a trained supervisor or trained company official believes or suspects that the employee is under the influence of drugs or alcohol (or both).

5.6 Return-to-Duty & Follow-Up

5.6.1 Employees retained by the Company after a positive test result or a test refusal will be subject to return-to-duty drug and alcohol testing. No employee will be permitted to perform any safety-sensitive function until they have received a verified negative drug and alcohol test result. Thereafter, such employees will be subject to certain follow-up drug and alcohol testing as established by Substance Abuse Professional (SAP).

6 Refusal to Submit to a Drug and/or Alcohol Test

6.1 You are considered to have refused to take a drug and/or alcohol test if you:

6.1.1 Drug Test

- 6.1.1.1 Fail to appear at a collection site for any test (except a pre-employment test) within a reasonable time, as determined by the Company. This includes the failure of the employee to appear for a test when called by the Company's third party administrator.
- 6.1.1.2 Fail to remain at the collection site until the testing process is complete; Provided that a person who leaves the testing site before the testing process commences for a preemployment test is not deemed to have refused to test.
- 6.1.1.3 Fail to provide a specimen.
- 6.1.1.4 Fail to permit a monitored or observed collection if the Company ordered or if the collector required the collection to be monitored or observed.
- 6.1.1.5 Fail to provide a sufficient amount of urine specimen, provided the Medical Review Officer (MRO) finds there was no medical reason for the employee to provide insufficient amount of urine.
- 6.1.1.6 Fail or decline to take an additional drug test that the Company or collector has directed.



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- 6.1.1.7 Fail to undergo a medical examination or evaluation the MRO or the Company has directed.
- 6.1.1.8 Fail to cooperate with any part of the specimen collection process.
- 6.1.1.9 Fail, for an observed collection, to follow the instructions to raise and lower clothing and turn around.
- 6.1.1.10 Possess or wear a prosthetic or other device that could be used to interfere with the collection process if the employee is found to have or wear a prosthetic or other device designed to carry clean urine or a urine substitute.
- 6.1.1.11 Admit to the collector to having adulterated or substituted the specimen.
- 6.1.1.12 Adulterate or substitute a urine specimen.
- 6.1.1.13 Admit to the MRO to having adulterated or substituted the specimen.

6.2 Alcohol Test

- 6.2.1 Fail to appear at an alcohol test site for any test within a reasonable time, as determined by the Company. This includes the failure of the employee to appear for a test when called by the Company's third party administrator.
- 6.2.2 Fail to remain at the alcohol test site until the testing process is complete.
- 6.2.3 Fail to provide an adequate amount of saliva or breath.
- 6.2.4 Fail to provide a sufficient breath specimen, provided the physician finds that there was no medical reason for the employee to provide an insufficient amount of breath.
- 6.2.5 Fail to undergo a medical examination or evaluation as the Company has directed as part of the insufficient breath procedures.
- 6.2.6 Fail to sign the certification statement at Step 2 of the Alcohol Testing Form (ATF).
- 6.2.7 Fail to cooperate with any part of the testing process.

7 Failed Test

7.1 Any employee that receives unacceptable drug and alcohol test results will not be allowed to work on a Client/Host site or facility and must be removed from the host company's property, site, or facility.

8 Substance Abuse Assessment

8.1 substance abuse assessments following a positive drug and/or alcohol test or for those who voluntarily seek assistance for a substance abuse issue.



Pandemic Preparedness	Reference: www.OSHA.gov	
Safety Coordinator	Connie Holguin	
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CHAPTER 28

1 Pandemic Preparedness Program

- 1.1 JDM Janitorial Inc. has developed the following policy on Pandemic Preparedness to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.
- 1.2 Disease can spread quickly from sick employees to others who are nearby in the workplace. Employees are often in close contact, sharing the same space, supplies, and equipment for long periods of time. As a result, there is an increased risk that employees will spread illnesses to each other.

2 Competent Person

- 2.1 Connie Holguin is the competent person responsible for the program.
- 2.2 Connie Holguin will be responsible for dealing with disease issues and their impact at the workplace.
- 2.3 This includes contacting local health department and health care providers in advance and developing and implementing protocols for response to ill individuals.

3 Training

- 3.1 Training will be provided by JDM Janitorial Inc. for employees on illness prevention, how to avoid spread of disease, and company policies concerning illness.
- 3.2 Employees will be trained on health issues of the pertinent disease to include prevention of illness, initial disease symptoms, preventing the spread of the disease, and when it is appropriate to return to work after illness.
- 3.3 Disease containment plans and expectations will be shared with employees.
- 3.4 Communicating information with non-English speaking employees or those with disabilities must be considered.

4 Hand Washing

- 4.1 It is the determination of JDM Janitorial Inc. to ensure that hand washing facilities, antiseptic hand cleaners, and other hygiene items are available.
- 4.2 Hand washing and use of hand sanitizers is encouraged by JDM Janitorial Inc..



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4.3 Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap and disposable towels will be provided by JDM Janitorial Inc..

5 Work/Stay at Home Policy

- 5.1 It is a requirement of JDM Janitorial Inc. that when employees are ill or are caring for others they stay home or work from home if available.
- 5.2 Workers are encouraged to stay at home when ill, when having to care for ill family members, or when caring for children when schools close, without fear of reprisal.
- 5.3 Tele-commuting and other work-at-home strategies shall be implemented to ensure business continuation.

6 Business Continuity

6.1 It is a requirement of JDM Janitorial Inc. that a business continuity plan be prepared so that if significant absenteeism or changes in business practices are made, required business operations can be effectively maintained.

7 Immunizations

- 7.1 Workers of JDM Janitorial Inc. are encouraged to obtain appropriate immunizations to help avoid disease.
- 7.2 Granting time off work to obtain the vaccine will be considered when vaccines become available in the community.

8 Internal Communications

8.1 Key contacts, a chain of communications and contact numbers for employees, and processes for tracking business and employees are available through request from Human Resources.

9 External/Customer Communications

9.1 Connie Holguin will notify key contacts including both customers and suppliers in the event an outbreak has impacted our company's ability to perform services. Connie Holguin will also notify customers and suppliers when operations resume.



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10 Social Distancing

10.1 If an outbreak or increased level of disease is in progress, social distancing including increasing the space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings will be considered.

11 Periodic Cleaning

- 11.1 It is a requirement of JDM Janitorial Inc. that routine cleaning/disinfection of surfaces such as desktops, keyboards, lunch tables, doorknobs, faucets, handrails, etc. must be done periodically.
- 11.2 Clean all areas that are likely to have frequent hand contact (like doorknobs, faucets, handrails) routinely and when visibly soiled.
- 11.3 Work surfaces should also be cleaned frequently using normal cleaning products.

12 Plan & Emergency Communications

- 12.1 It is a requirement of JDM Janitorial Inc. that the plan and emergency communications procedures be tested in some manner, for example in a table-top exercise.
- 12.2 The plan and emergency communication strategies will be periodically tested (for example annually) to ensure it is effective and workable.

13 Lessons Learned

13.1 Following a pandemic event, the person responsible for implementation of the plan should identify learning opportunities and take action to implement any corrective actions.

14 COVID-19 Policy

14.1 Business Travel

- 14.1.1 All international business travel is suspended until further notice.
- 14.1.2 Any domestic (US) business travel requiring air travel should be on a critical business purpose only (for example, meeting with a customer). All currently scheduled and future domestic business travel requires approval from the respective Lead Team Member.
- 14.1.3 When possible, utilize our remote technologies such as Skype meetings to facilitate meetings normally requiring face-to-face business travel.

14.2 Illness

14.2.1 We ask that employees who are not feeling well with acute respiratory symptoms and a fever of 100.4 degrees or greater not report to work. We ask that you are symptom free for 72 hours before returning to work. We urge all employees with these symptoms to seek care from their Health Care Professional.



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14.3 **Prevention**

- 14.3.1 The number one thing an employee can do to prevent the spread is to stay home when showing any symptoms.
- 14.3.1.1 Additional steps to prevent the spread of all illnesses include:
- 14.3.1.2 Washing hands frequently with soap and water for at least 20 seconds.
- 14.3.1.3 · Utilizing alcohol based hand sanitizer frequently.
- 14.3.1.4 · Cover your mouth and nose with a tissue when you cough or sneeze. If you don't have a tissue, cough or sneeze into your upper sleeve, not your hands.

14.4 Temporary Employees and Contractors

14.4.1 These requirements and guidelines should be shared with all employees working for temporary agencies as well as other contractors working at any JDM Janitorial Inc. sites. Sponsors to any contracting company, it is a requirement that this policy be communicate to them.

15 How to Clean and Disinfect

- 15.1 Wear disposable gloves when cleaning and disinfecting surfaces. Gloves should be discarded after each cleaning. If reusable gloves are used, those gloves should be dedicated for cleaning and disinfection of surfaces for COVID-19 and should not be used for other purposes. Consult the manufacturer's instructions for cleaning and disinfection products used. Clean hands immediately after gloves are removed.
- 15.2 If surfaces are dirty, they should be cleaned using a detergent or soap and water prior to disinfection.
- 15.3 For disinfection, diluted household bleach solutions, alcohol solutions with at least 70% alcohol, and most common EPA-registered household disinfectants should be effective.
- 15.3.1 Diluted household bleach solutions can be used if appropriate for the surface. Follow manufacturer's instructions for application and proper ventilation. Check to ensure the product is not past its expiration date. Never mix household bleach with ammonia or any other cleanser. Unexpired household bleach will be effective against coronaviruses when properly diluted.
- 15.3.1.1 Prepare a bleach solution by mixing:
- 15.3.1.1.1 5 tablespoons (1/3rd cup) bleach per gallon of water or
- 15.3.1.1.2 4 teaspoons bleach per quart of water
- 15.4 Products with EPA-approved emerging viral pathogens claims are expected to be effective against COVID-19 based on data for harder to kill viruses. Follow the manufacturer's instructions for all cleaning and disinfection products (e.g., concentration, application method and contact time, etc.).



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- 15.5 For soft (porous) surfaces such as carpeted floor, rugs, and drapes, remove visible contamination if present and clean with appropriate cleaners indicated for use on these surfaces. After cleaning:
- 15.5.1 Launder items as appropriate in accordance with the manufacturer's instructions. If possible, launder items using the warmest appropriate water setting for the items and dry items completely, or

Use products with the EPA-approved emerging viral pathogens claims that are suitable for porous surfaces.

16 Clothing, Towels, Linens and Other Items That Go In The Laundry

- 16.1 Wear disposable gloves when handling dirty laundry from an ill person and then discard after each use. If using reusable gloves, those gloves should be dedicated for cleaning and disinfection of surfaces for COVID-19 and should not be used for other household purposes. Clean hands immediately after gloves are removed.
- 16.1.1 If no gloves are used when handling dirty laundry, be sure to wash hands afterwards.
- 16.1.2 If possible, do not shake dirty laundry. This will minimize the possibility of dispersing virus through the air.
- 16.1.3 Launder items as appropriate in accordance with the manufacturer's instructions. If possible, launder items using the warmest appropriate water setting for the items and dry items completely. Dirty laundry from an ill person can be washed with other people's items.
- 16.1.4 Clean and disinfect clothes hampers according to guidance above for surfaces. If possible, consider placing a bag liner that is either disposable (can be thrown away) or can be laundered.

17 COVID-19 Contractor Temperature Screening

- 17.1 Beginning in Hot-Standby phase, JDM Janitorial Inc. will perform active screening of their employees.
- 17.2 Screening can take place off-site before entering or onsite after entering facility, but must take place before work begins.
- 17.3 JDM Janitorial Inc. shall determine the best method for their workers to minimize disruption, but must involve an actual temperature measurement to ensure temperature is less than 100.4. Examples include:
- 17.3.1 Personal thermometer (preferred).
- 17.3.2 Infrared temperature scanning.
- 17.3.3 Temporal temperature scan.



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- 17.4 JDM Janitorial Inc. shall use our own tracking mechanism, and ensures daily measurements are taken.
- 17.5 Any individual found to have temperature 100.4 or greater must immediately leave the site, name must be captured and provided for badge deactivation until return to work release is obtained.
- 17.6 A verification process is in place to ensure confirmation of contractor temperature measurements.
- 17.7 JDM Janitorial Inc. shall provide daily updates to the Manager (or assigned designee) confirming screen completion of all workers onsite and number of individuals with temperature greater than 100.4 who are quarantined.
- 17.8 The Manager/assigned designee periodically asks for details on where and when testing was conducted.
- 17.9 Use (time-stamped photos/Facetime) for temperature screening confirmation.
- 17.10 JDM Janitorial Inc. shall report the information requested to their Manager daily.
- 17.11 Connie Holguin can determine who will perform the temperature measurements but can utilize resources internal or external.
- 17.11.1 Example Utilizing nurses from a local Occupational Health clinic to perform screening onsite
- 17.12 Individuals performing measurements must be protected and take certain precautions. Minimum recommendations are:
- 17.12.1 Ensure the individual performing the test does not have symptoms of illness.
- 17.12.2 JDM Janitorial Inc. shall use discretion for monitoring.
- 17.12.3 JDM Janitorial Inc. recommends:
- 17.12.3.1 Use of surgical mask at a minimum (N95 also acceptable)
- 17.12.3.2 Use of surgical/medical gloves that are changed after contact with an individual
- 17.12.3.3 Method to capture names of any individual with temperature of 100.4 or greater

18 Prevention of Spread

- 18.1 A workplace hazard assessment specific to pandemic purposes shall be conducted.
- 18.2 Any employee, in the event of possible exposure shall self-quarantine and seek medical screening and testing as appropriate and notify their manager or supervisor.
- 18.3 Hand washing and use of hand sanitizers shall be encouraged by company supervision. Hand washing facilities, hand sanitizers, tissues, no touch trash cans, hand soap, and disposable towels shall be provided at no cost to employees.

JANITORIAL NOTINAL

JDM Janitorial Inc.

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18.4 Consideration shall be given to social distancing including increasing space between employee work areas and decreasing the possibility of contact by limiting large or close contact gatherings.

18.5 Flexible work schedules shall be established when possible. Employees are encouraged to stay home when ill, when having to care for others that are ill, or when under such orders from governmental authorities.



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Personal Protective Equipment (PPE)	Reference: 29 CFR 1910.132, 1926.28	
Safety Coordinator	Connie Holguin	
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CHAPTER 29

1 Personal Protective Equipment Program

- 1.1 Personal protective equipment, commonly referred to as "PPE", is equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses.
- 1.1.1 These injuries and illnesses may result from contact with chemical, radiological, physical, electrical, mechanical, or other workplace hazards.
- 1.2 Protective equipment, including personal protective equipment (PPE) for eyes, face, head, and extremities, protective clothing, respiratory devices, and protective shields and barriers, shall be provided, used, and maintained in a sanitary and reliable condition.
- 1.3 JDM Janitorial Inc. has developed the following policy on Personal Protective Equipment to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, and full body suits. (but not limited to)

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the use of personal protective equipment.
- 4.2 The training will cover:
- 4.2.1 When it is necessary,
- 4.2.2 What kind is necessary,
- 4.2.3 How to properly put it on, adjust, wear and take it off,
- 4.2.4 The limitations of the equipment,
- 4.2.5 Proper care, maintenance, useful life, and disposal of the equipment.



Personal Protective	Reference: 29 CFR 1910.1	32, 1926.28	
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- 4.3 When JDM Janitorial Inc. has reason to believe that any affected employee who has already been trained does not have the understanding and skills required, the employee will be retrained.
- 4.4 Circumstances where retraining is required include, but are not limited to, situations where:
- 4.4.1 Changes in the workplace render previous training obsolete; or
- 4.4.2 Changes in the types of PPE to be used render previous training obsolete; or
- 4.4.3 Inadequacies in an affected employee's knowledge or use of assigned PPE indicate that the employee has not retained the requisite understanding or skill.
- 4.5 Training will be documented to include the following:
- 4.5.1 Employee names,
- 4.5.2 Dates of training and
- 4.5.3 The training contents.

5 Personal Protective Equipment

- 5.1 Protective equipment will be provided, used, and maintained in a sanitary and reliable condition wherever it is necessary by reason of hazards of processes or environment, chemical hazards, radiological hazards, or mechanical irritants encountered in a manner capable of causing injury or impairment in the function of any part of the body through absorption, inhalation or physical contact.
- 5.2 Personal protective equipment (PPE) must properly fit each affected company employee.
- 5.3 PPE that fits poorly will not afford the necessary protection.

5.4 Employee-owned equipment

- 5.4.1 Where employees provide their own protective equipment, it is a requirement that adequacy, proper maintenance, and sanitation of such equipment is held to the standards of the PPE provided by JDM Janitorial Inc..
- 5.5 JDM Janitorial Inc. is responsible for the adequacy, maintenance, and sanitation of employeeowned equipment.
- 5.6 **Design**
- 5.6.1 All personal protective equipment shall be of safe design and construction for the work to be performed.



Personal Protective Equipment (PPE)	Reference: 29 CFR 1910.132, 1926.28	
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6 Hazard Assessment and Equipment Selection

- 6.1 JDM Janitorial Inc. shall verify that the required workplace hazard assessment has been performed through a written certification that identifies the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and identification of assessment documents.
- 6.2 JDM Janitorial Inc. will assess the workplace to determine if hazards are present, or are likely to be present, which deem the use of personal protective equipment (PPE).
- 6.3 If such hazards are present, or likely to be present, JDM Janitorial Inc. will:
- 6.3.1 Select, and have each affected employee use, the types of PPE that will protect the affected employee from the hazards identified in the written hazard assessment,
- 6.3.2 Communicate selection decisions to each affected employee and,
- 6.3.3 Select PPE that properly fits each affected employee.
- 6.4 JDM Janitorial Inc. will verify that the required workplace hazard assessment has been performed through a written certification that identifies:
- 6.5 The workplace evaluated,
- 6.6 The persons signature certifying that the evaluation has been performed,
- 6.7 The date(s) of the hazard assessment and, which identifies the document as a certification of hazard assessment.

7 Defective and Damaged Equipment

7.1.1 Defective or damaged personal protective equipment shall not be used and must be removed from service.

8 Eye and Face Protection

8.1 The Connie Holguin shall ensure that each affected employee uses appropriate eye or face protection when exposed to eye or face hazards from flying objects, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation.



Personal Protective Equipment (PPE)	Reference: 29 CFR 1910.132, 1926.28	
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9 Side Protectors

9.1 Safety glasses shall have permanent side protectors.

10 Prescription Lenses

10.1 Each employee who wears prescription lenses shall wear protection that incorporates the prescription or protection that can be worn over the prescription lenses, when involved in a potential eye hazard situation.

11 Eye and Face Protection: Minimum Requirements

- 11.1 Safety glasses or goggles (depending on the task) shall be worn by personnel.
- 11.2 Protective eye and face protection for welding operations shall be used for all welding operations.

12 Head Protection

- 12.1 The supervisor shall ensure that each affected employee wears an approved hardhat when working in areas where there is a potential for head injury from falling or overhead objects.
- 12.2 The supervisor shall ensure that each employee exposed to electrical conductors that could contact the head, wears a protective helmet designed to reduce electrical shock hazards.
- 12.3 JDM Janitorial Inc. has selected protective helmets in accordance with ANSI Z89.1-1997 Standards.
- 12.4 ANSI Standards have two (2) types of protective helmets classified for impact:
- 12.4.1 Type I intended for impact resulting from a blow to the top of the head.
- 12.4.2 Type II intended for impact resulting from a blow, which may be received off center or to the top of the head.
- 12.5 In addition, ANSI Standards have three (3) types of protective helmets classified for electrical:
- 12.5.1 Class G (general) intended to reduce the danger of contact to low-voltage conductors (proof tested to 2,200 volts phase to ground).
- 12.5.2 Class E (electrical) intended to reduce the danger of contact to high-voltage conductors (proof tested to 20,00 volts phase to ground).
- 12.5.3 Class C (conductive) not intended to provide protection against contact with electrical conductors.



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- 12.6 Note: proof-test voltages are not intended as indicator of the voltage at which the helmet protects the wearer.
- 12.7 JDM Janitorial Inc. has selected to provide on Type II, Class G or E protective helmets for those required to wear such protection.
- 12.8 Type II, Class G or E head protection shall be worn by personnel in the required AREAS.

13 Foot Protection

- 13.1 The supervisor shall ensure affected employees wear approved protective footwear when working in areas where there is a danger of foot injury from falling or rolling objects, or objects piercing the sole, and where such employees are exposed to electrical hazards.
- 13.2 Food protection shall be Impact (I/75 = 75 ft. Ibf) and Compression (C/75 = 2500 lb) Resistance (via ANSI 41-1991) and may provide other protection such as:
- 13.2.1 Metatarsal (Mt/75 75 ft. lbf) protective.
- 13.2.2 Electrical hazard protective.
- 13.2.3 Sole puncture resistant.
- 13.3 Impact and compression resistance protective footwear shall be worn by personnel in required areas.
- 13.4 Electrical hazard (EH) protective footwear shall be worn by personnel in all required areas.

14 Hand Protection

- 14.1 The supervisor shall ensure that each affected employee wears the appropriate hand protection when exposed to hazards such as those from skin absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns and harmful temperature extremes.
- 14.2 The type of hand protection used will be dependent on the hazard(s) present as identified in the workplace hazard assessment.
- 14.3 JDM Janitorial Inc. shall base the selection of the appropriate hand protection on an evaluation of the performance characteristics of the hand protection relative to the following:
- 14.3.1 Task(s) to be performed
- 14.3.2 Dexterity required.
- 14.3.3 Conditions present.
- 14.3.4 Duration and frequency of use.
- 14.3.5 Degree of exposure of the hazard.
- 14.3.6 Physical stress that will be applied.
- 14.3.7 The hazards and potential hazards identified.



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15 PPE Hazard Assessment Certification

Personal Protective Equipment						
Hazard Assessment Certification						
Job Title:		Date:				
Department:		Supervisor				
Location\Worksite:		Signature				
Employee Name(s):						
Tasks, Job Classifications or	Potential Hazard	PPE Required	Type of PPE Required			
Workstation		(Yes/No)				



Preventative	Reference: www.OSHA.gov	Α
Maintenance		
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CHAPTER 30

1 Preventative Maintenance Program

- 1.1 A preventive maintenance program is the key to reliable and efficient operation of any dust control equipment or system.
- 1.2 JDM Janitorial Inc. has developed the following policy on Preventative Maintenance to ensure the safety of our employees/equipment and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, Hard Hats, Eye & Ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Inventory

- 4.1 It is a requirement that an inventory of JDM Janitorial Inc.'s machinery / equipment must be established and kept current.
- 4.2 When new machinery or equipment is acquired, it must be added to the inventory.

5 Preventative Maintenance/Inspection Schedule

5.1 It is the policy of JDM Janitorial Inc. that the preventative maintenance schedule must be established based on manufacturer requirements and industry standards.

6 Records

6.1 It is a requirement of JDM Janitorial Inc. that preventative maintenance performed on machinery or equipment must be documented and retained for the life of the machinery or equipment.

7 Defective Equipment

7.1 Defects observed in machinery or equipment must be reported to a supervisor, and must be repaired or replaced before being used again.



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8 Maintenance Checklist

Freq.	Equipment Nomenclature	Item Number & Location	J	F	М	А	М	J	J	A	S	0	N	D



Respiratory Protection	Reference: 29 CFR 1910.134, 1926.103		
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CHAPTER 31

1 Respiratory Protection Program

- 1.1 An estimated 5 million workers are required to wear respirators in 1.3 million workplaces throughout the United States.
- 1.2 Respirators protect workers against insufficient oxygen environments, harmful dusts, fogs, smokes, mists, gases, vapors, and sprays.
- 1.3 These hazards may cause cancer, lung impairment, diseases, or death.
- 1.4 JDM Janitorial Inc. has developed the following policy on Respiratory protection to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Certification training, Fit testing.
- 2.2 PPE: Safety vests, Respirators.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 It's the determination of JDM Janitorial Inc. to ensure that each employee can demonstrate knowledge of at least the following:
- 4.1.1 Why the respirator is necessary and how improper fit, usage, or maintenance can compromise the protective effect of the respirator,
- 4.1.2 What the limitations and capabilities of the respirator are,
- 4.1.3 How to use the respirator effectively in emergency situations, including situations in which the respirator malfunctions, how to inspect, pout on and remove, use and check the seals of the respirator, what the procedures are for maintenance and storage of the respirator, how to recognize medical signs and symptoms that may limit or prevent the effective us of respirators.
- 4.1.4 Training shall be provided prior to requiring the employee to use a respirator in the workplace and annually thereafter.



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- 4.2 Retraining will be administered annually, and when the following situations occur:
- 4.2.1 Changes in the workplace or the type of respirator render previous training obsolete, inadequacies in the employee's knowledge or use of the respirator indicate that the employee has not retained the requisite understanding or skill, or when any other situation arises in which retraining appears necessary to ensure safe respirator use.

5 Purpose

- 5.1 JDM Janitorial Inc. has determined that employees may be exposed to respiratory hazards during routine operations.
- 5.2 During these routine operations respirators will be provided at no cost to employees.
- 5.3 These hazards include wood dust, particulates, and vapors, and in some cases, represent Immediately Dangerous to Life or Health (IDLH) conditions.
- 5.4 The purpose of this program is to ensure that all of JDM Janitorial Inc. employees are protected from exposure to these respiratory hazards.
- 5.5 Engineering controls, such as ventilation and substitution of less toxic materials, are the first line of defense at JDM Janitorial Inc..
- 5.6 However, engineering controls have not always been feasible for some of our operations or have not always completely controlled the identified hazards.
- 5.7 In these situations, respirators and other protective equipment will be provided at no cost and must be used.
- 5.8 Respirators are also needed to protect employees' health during emergencies.
- 5.9 The work processes requiring respirator use at JDM Janitorial Inc. are outlined in end of this program
- 5.10 In addition, some employees have expressed a desire to wear respirators during certain operations that do not require respiratory protection.
- 5.11 As a general policy JDM Janitorial Inc. will review each of these requests on a case-by-case basis.
- 5.11.1 If the use of respiratory protection in a specific case will not jeopardize the health or safety of the employee(s), JDM Janitorial Inc. will provide respirators for voluntary use.
- 5.11.2 As outlined in the Scope and Application section of this program, voluntary respirator use is subject to certain requirements of this program.
- 5.12 This program applies to all employees who are required to wear respirators during normal work operations, and during some non-routine or emergency operations such as a spill of a hazardous substance.
- 5.12.1 In addition, any employee who voluntarily wears a respirator when a respirator is not required is subject to the medical evaluation, cleaning, maintenance, and storage elements of this program, and must be provided with certain information specified in this section of the program.



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6 Responsibilities

6.1 **Program Administrator:**

- 6.2 The Program Administrator for JDM Janitorial Inc. is Connie Holguin who is qualified by appropriate training or experience that is commensurate with the complexity of the program to administer or oversee the respiratory protection program and conduct the required evaluations of program effectiveness.
- 6.3 The Program Administrator is responsible for administering the respiratory protection program.

6.3.1 Duties of the program administrator include:

- 6.3.2 Identifying work areas, processes or tasks that require workers to wear respirators, and evaluating hazards.
- 6.3.3 Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.
- 6.3.4 Selection of respiratory protection options.
- 6.3.5 Monitoring respirator use to ensure that respirators are used in accord with their certifications.
- 6.3.6 Arranging for and/or conducting training.
- 6.3.7 Ensuring proper storage, cleaning, inspections, and maintenance of respiratory protection equipment.
- 6.3.8 Conducting qualitative fit testing with Bitrex.
- 6.3.9 Administering the medical surveillance program.
- 6.3.10 Maintaining records required by the program.
- 6.3.11 Evaluating the program.
- 6.3.12 Updating written program, as needed.
- 6.4 Supervisors:



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- 6.4.1 Supervisors are responsible for ensuring that the respiratory protection program is implemented in their particular areas.
- 6.4.2 In addition to being knowledgeable about the program requirements for their own protection, supervisors must also ensure that the program is understood and followed by the workers under their charge.
- 6.5 Note: Workers participating in the respiratory protection program do so at no cost to themselves.

6.6 **Duties of the supervisor include:**

- 6.6.1 Ensuring that employees under their supervision (including new hires) have received appropriate training, fit testing, and annual medical evaluation.
- 6.6.2 Ensuring the availability of appropriate respirators and accessories.
- 6.6.3 Being aware of tasks requiring the use of respiratory protection.
- 6.6.4 Enforcing the proper use of respiratory protection when necessary.
- 6.6.5 Ensuring that respirators are properly cleaned, maintained, inspected, and stored according to the respiratory protection plan.
- 6.6.6 Ensuring that respirators fit well and do not cause discomfort.
- 6.6.7 Continually monitoring work areas and operations to identify respiratory hazards.
- 6.6.8 Coordinating with the Program Administrator on how to address respiratory hazards or other concerns regarding the program.
- 6.6.9 Ensuring adequate air quantity, quality, and flow of breathing air for atmosphere-supplying respirators.

6.7 Employees:

- 6.8 Each employee has the responsibility:
- 6.8.1 To wear his or her provided respirator when and where required and in the manner in which they were trained.
- 6.8.2 Care for and maintain their respirators as instructed, and store them in a clean, sanitary location.



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- 6.8.3 Inform their supervisor if the respirator no longer fits well, and request a new one that fits properly.
- 6.8.4 Inform their supervisor or the Program Administrator of any respiratory hazards that they feel are not adequately addressed in the workplace and of any other concerns that they have regarding the program.
- 6.8.5 Inform their supervisor of need for a medical reevaluation.

7 Selection Procedures

- 7.1 The Program Administrator:
- 7.1.1 Will select respirators to be used on site, based on the hazards to which workers are exposed and in accord with all applicable OSHA standards.
- 7.1.2 Will conduct a hazard evaluation for each operation, process, or work area where airborne contaminants may be present in routine operations or during an emergency.
- 7.1.3 Monitoring can be contracted out.
- 7.2 The hazard evaluation will include:
- 7.2.1 Identification and development of a list of hazardous substances used in the workplace, by department or work process.
- 7.2.2 Review of work processes to determine where potential exposures to these hazardous substances may occur.
- 7.2.2.1 This review is to be conducted by surveying the workplace, reviewing process records, and talking with employees and supervisors.
- 7.2.3 Exposure monitoring to quantify potential hazardous exposures.
- 7.2.4 If worker exposures have not been, or cannot be, evaluated they must be considered IDLH.

7 Selection Procedures Continued

- 7.2.5 Respirators are selected based on the workplace hazards evaluated, and workplace and user factors affecting respirator performance and reliability.
- 7.2.6 Respirators are selected based on the Assigned Protection Factors (APFs) and calculated Maximum Use Concentrations (MUCs).
- 7.3 A sufficient number of respirator sizes and models must be provided to the employee during fit testing to identify the acceptable respirator that correctly fits the users.
- 7.4 For IDLH atmospheres: Full facepiece pressure demand SARs with auxiliary SCBA unit or full facepiece pressure demand SCBAs, with a minimum service life of 30 minutes, must be provided.



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- 7.5 Respirators used for escape only are NIOSH-certified for the atmosphere in which they will be used.
- 7.6 Oxygen deficient atmospheres are considered IDLH.
- 7.7 For Non-IDLH atmospheres, respirators are:
- 7.7.1 Selected as appropriate for the APFs and MUCs.
- 7.7.2 Selected as appropriate for the chemical nature and physical form of the contaminant.
- 7.7.3 Equipped with end-of-service-life indicators (ESLIs) if the respirators (APRs) are used for protection against gases and vapors. If there is no ESLI, then a change schedule must be implemented.
- 7.7.4 Equipped with NIOSH-certified HEPA filters (or other filters certified by NIOSH for particulates under 42 CFR part 84) if the respirators (APRs) are to be used for protection against particulates.

8 Medical Evaluation

- 8.1 This company shall provide a medical evaluation to determine the employee's ability to use a respirator. The medical questionnaire and examinations shall be administered confidentially during the employee's normal working hours.
- 8.2 Employees who are either required to wear respirators, or who choose to wear an APR voluntarily, must pass a medical exam before being permitted to wear a respirator on the job.
- 8.3 Employees are not permitted to wear respirators until a PLHCP has determined that they are medically able to do so.
- 8.4 Any employee refusing the medical evaluation will not be allowed to work in an area requiring respirator use.

8 Medical Evaluation Continued

- 8.5 A PLHCP ______, where all company medical services are provided, will provide the medical evaluations.
- 8.6 Medical evaluation procedures are as follows:
- 8.7 The medical evaluation will be conducted using the questionnaire provided in Appendix C of the Respiratory Protection standard.
- 8.8 The Program Administrator will provide a copy of this questionnaire to all employees requiring medical evaluations.
- 8.8.1 To the extent feasible, the company will assist employees who are unable to read the questionnaire (by providing help in reading the questionnaire).
- 8.8.2 When this is not possible, the employee will be sent directly to the physician for medical evaluation.



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- 8.8.3 All affected employees will be given a copy of the medical questionnaire to fill out, along with a stamped and addressed envelope for mailing the questionnaire to the company physician.
- 8.9 Employees will:
- 8.9.1 Be permitted to fill out the questionnaire on company time.
- 8.9.2 Be granted follow-up medical exams as required by the Respiratory Protection standard, and/or as deemed necessary by ______ the PLHCP.
- 8.9.3 Be granted the opportunity to speak with the physician about their medical evaluation, if they so request.
- 8.9.4 The Program Administrator has provided ______ the physician with:
- 8.9.4.1 A copy of this program, and a copy of the Respiratory Protection standard.
- 8.9.4.2 The list of hazardous substances by work area, and for each employee requiring evaluation, his or her work area or job.
- 8.9.4.3 The employee's title, proposed respirator type and weight, length of time required to wear the respirator, expected physical work load (light, moderate, or heavy), potential temperature and humidity extremes, and any additional protective clothing required.
- 8.9.4.4 Any employee required for medical reasons to wear a positive pressure air purifying respirator will be provided with a powered air purifying respirator.

8 Medical Evaluation Continued

- 8.10 After an employee has received clearance and begun to wear his or her respirator, additional medical evaluations will be provided if:
- 8.10.1 The employee reports signs and/or symptoms related to their ability to use a respirator, such as shortness of breath, dizziness, chest pains, or wheezing.
- 8.10.2 The PLHCP ______ or supervisor informs the Program Administrator that the employee needs to be reevaluated, additional medical evaluation will be provided.
- 8.10.3 Information from this program, including observations made during fit testing and program evaluation, indicates a need for reevaluation.
- 8.11 An example of the PLHCP's or the supervisor's observations that additional medical evaluation is needed could be that there has been a change in workplace conditions that may result in an increased physiological burden on the employee.
- 8.12 A list of JDM Janitorial Inc.'s employees currently included in medical surveillance is provided in the end of this program.



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8.13 All examinations and questionnaires are to remain confidential between the employee and the physician.

9 Fit Testing

- 9.1 Fit testing is required for employees wearing half facepiece APRs for exposure to wood dust in Prep and Assembly, and maintenance workers who wear a tight-fitting SAR.
- 9.2 Employees voluntarily wearing half facepiece APRs may also be fit tested upon request.
- 9.3 Employees who are required to wear half facepiece APRs will be fit tested:
- 9.3.1 Prior to being allowed to wear any respirator with a tight fitting facepiece.
- 9.3.2 Annually.
- 9.3.3 When there are changes in the employee's physical condition that could affect respiratory fit (e.g., obvious change in body weight, facial scarring, etc.).
- 9.4 Employees will be fit tested with the make, model, and size of respirator that they will actually wear.
- 9.5 Employees will be provided with several models and sizes of respirators so that they may find an optimal fit.
- 9.6 Fit testing of PAPRs is to be conducted in the negative pressure mode.
- 9.7 The Program Administrator will conduct fit tests prior to initial use, following the OSHA approved Bitrex Solution Aerosol QLFT Protocol.
- 9.8 Employees must pass qualitative fit test (QLFT) or quantitative fit test (QNFT) before initial use, if a different respirator is used, and annually.

10 Respirator Use

10.1 **Responsibilities for Employees are that they:**

- 10.2 JDM Janitorial Inc. prohibits conditions that may result in facepiece seal leakage including facial hair, corrective glasses or goggles, or any condition that interferes with the face-to-facepiece seal or valve function.
- 10.3 JDM Janitorial Inc. ensures that employees will perform a user seal check each time they put on the respirator.
- 10.3.1 Will use their respirators under conditions specified by this program, and in accord with the training they receive on the use of each particular model.
- 10.3.2 In addition, the respirator must not be used in a manner for which it is not certified by NIOSH or by its manufacturer.
- 10.3.3 Must conduct user seal checks each time that they wear their respirator.



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- 10.3.4 Must use either the positive or negative pressure check (depending on which test works best for them).
- 10.3.5 Must leave the work area to go to the locker room to maintain their respirator for the following reasons:
- 10.3.5.1 To clean their respirator if the respirator is impeding their ability to work,
- 10.3.5.2 To change filters or cartridges, or replace parts,
- 10.3.5.3 To inspect the respirator if it stops functioning as intended.
- 10.3.6 Should notify their supervisor before leaving the area.
- 10.3.7 Not wear tight-fitting respirators if they have any condition, such as facial scars, facial hair, or missing dentures, that prevents them from achieving a good seal.
- 10.3.8 Not wear headphones, jewelry, or other articles that may interfere with the facepiece-to-face seal or valve function.

11 Emergency Procedures:

11.1 The following work areas have been identified as having foreseeable emergencies:

Area	Hazard

- 11.2 When the alarm sounds, employees in the affected department must immediately don their emergency escape respirator, shut down their process equipment, and exit the work area. •
- 11.3 All other employees must immediately evacuate the building.
- 11.4 JDM Janitorial Inc.'s Emergency Action Plan describes these procedures (including proper evacuation routes and rally points) in greater detail.



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11.5 Emergency escape respirators are located in (at):

- 11.6 Respiratory protection in these instances is for escape purposes only.
- 11.7 JDM Janitorial Inc.'s employees are not trained as emergency responders, and are not authorized to act in such a manner.

12 Respirator Malfunction

12.1 APR Respirator Malfunction:

- 12.1.1 For any malfunction of an APR (e.g., breakthrough, facepiece leakage, or improperly working valve), the respirator wearer must inform his or her supervisor that the respirator no longer functions, and go to the designated safe area to maintain the respirator.
- 12.1.2 The supervisor must ensure that the employee receives the needed parts to repair the respirator, or is provided with a new respirator.
- 12.1.3 Employees must leave the respirator use area if they detect vapor or gas breakthrough, changes in breathing resistance, or leakage of the facepiece.

12.2 Atmosphere-Supplying Respirator Malfunction:

- 12.2.1 All workers wearing atmosphere-supplying respirators will work with a buddy.
- 12.2.1.1 Buddies should assist workers who experience an SAR malfunction as follows:
- 12.2.1.1.1 If a worker experiences a malfunction of an SAR, he or she should signal to the buddy that he or she has had a respirator malfunction.
- 12.2.1.1.2 The buddy shall don an emergency escape respirator and aid the worker in immediately exiting the area.
- 12.2.1.1.3 If one of the workers experiences a respirator malfunction, he/she shall signal this to their buddy.
- 12.2.1.1.4 The buddy must immediately stop what he or she is doing to escort the worker to the Prep staging area where the worker can safely remove the SAR.



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13 Respirator Inspections

- 13.1 All respirators used in routine situations must be inspected before each use and during cleaning.
- 13.2 All respirators maintained for use in emergency situations must be inspected at least monthly and in accordance with the manufacturer's recommendations,
- 13.3 They must also be checked for proper function, tightness of connections, and the condition of the various parts. before and after each use.
- 13.4 Emergency escape-only respirators must be inspected before being carried into the workplace for use.

14 IDLH Procedures

- 14.1 It's required by JDM Janitorial Inc. that at least one employee is located outside the IDLH atmosphere, maintains communication, is properly trained and equipped to provide emergency rescue, has notification procedures, and provides necessary assistance appropriate to the situation.
- 14.2 The Program Administrator has identified the following area as presenting the potential for IDLH conditions:

Area	Hazard	Corrective Action or (PPE)



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- 14.3 As specified above, the Program Administrator has determined that workers entering this area must wear a pressure demand SAR with auxiliary air supply and appropriate retrieval equipment or equivalent rescue means.
- 14.4 In addition, an appropriately trained and equipped standby person must remain outside and maintain constant voice and visual communication with the worker. –
- 14.5 In the event of an emergency requiring the standby person to enter the IDLH environment, the standby person must immediately notify the Program Administrator and will proceed with rescue operations in accord with rescue procedures of the Confined Space Program.

15 Program Surveillance

- 15.1 It is a requirement to JDM Janitorial Inc. that the program must be monitored for effectiveness.
- 15.2 Employees are required to leave the area to wash their faces and respirator facepieces, change cartridges, or if they detect vapor or gas breakthrough or breathing resistance.

16 Cleaning & Storage

- 16.1 It is a requirement of JDM Janitorial Inc. that respirators issued for the exclusive use of an employee must be cleaned and disinfected as often as necessary to be maintained in a sanitary condition.
- 16.2 All respirators must be stored to protect them from damage, contamination, dust, sunlight, extreme temperatures, excessive moisture, and damaging chemicals, and they must be packed or stored to prevent deformation of the facepiece and exhalation valve.

17 Program Evaluation

- 17.1 To verify written program effectiveness JDM Janitorial Inc. will conduct evaluations of the workplace as necessary to ensure implementation.
- 17.2 JDM Janitorial Inc. will regularly consult employees about fit, selection, use, maintenance, etc., and overall program effectiveness.

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18 Medical Surveillance Program Employees

Employee Name	Date

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19 Hazard Assessment List

Department	Contaminants	Exposure Level (8-hr TWA)	Permissible Exposure Limit (PEL)	Controls

JDM Janitorial Inc. Respiratory Protection Reference: 29 CFF



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20 Voluntary or Mandatory Respirators

Type of Respirator	Employee Work Area	Conditions of Use

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١	Risk Assessment	Reference: www.OSHA.gov	
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CHAPTER 32

1 Risk Assessment Program

- 1.1 A hazard is the potential for harm. In practical terms, a hazard often is associated with a condition or activity that, if left uncontrolled, can result in an injury or illness.
- 1.1.1 See Common Hazards and Descriptions list in this section.
- 1.2 Identifying hazards and eliminating or controlling them as early as possible will help prevent injuries and illnesses.
- 1.3 A risk assessment is a technique that focuses on job tasks as a way to identify hazards before they occur.
- 1.3.1 It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.
- 1.4 JDM Janitorial Inc. has developed the following policy on risk assessment to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, hard hats, work boots, eye & ear, as required.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

4.1 Training will be provided by JDM Janitorial Inc. for All employees should be trained on workplace hazards and how to identify, report, control them and care of proper PPE.

5 Hazard Classification

- 5.1 It is a requirement of JDM Janitorial Inc. that hazards must be classified based on the risk involved with that task.
- 5.2 The risk analysis matrix that indicates the severity and probability at the end of this program must be used.



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6 Risk Assessment

- 6.1 It is a requirement of JDM Janitorial Inc. that a risk assessment must be conducted on each job.
- 6.2 Priority should go to the following types of jobs:
- 6.2.1 Jobs with the highest injury or illness rates,
- 6.2.2 Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents,
- 6.2.3 Jobs in which one simple human error could lead to a severe accident or injury,
- 6.2.4 Jobs that are new to your operation or have undergone changes in processes and procedures and
- 6.2.5 Jobs complex enough to require written instructions.
- 6.3 Collect, organize, and review information with workers to determine what types of hazards may be present and which workers may be exposed or potentially exposed. Information available in the workplace may include: equipment and machinery operating manuals, Safety Data Sheets (SDS); inspection reports; records of previous injuries and illnesses; incident investigation reports; results of job safety analyses (JSA).
- 6.4 Conduct and document regular inspections of all operations, equipment, work areas and facilities for safety hazards.
- 6.5 Identify health hazards including chemical hazards, physical hazards, biological hazards, and ergonomic risk factors by conducting qualitative exposure assessments and reviewing employee medical records.
- 6.6 Workplace incidents including injuries, illnesses, near misses, and stop work interventions should be investigated to identify the root cause in order to prevent future occurrences.
- 6.7 Evaluate each hazard by considering the severity of potential outcomes the likelihood that an event or exposure will occur, and the number of workers who might be exposed in order to prioritize the hazards so that those presenting the greatest risk are addressed first.
- 6.8 Getting our employees/subcontractors involved.
- 6.8.1 It is very important to involve our employees/subcontractors in the hazard analysis process. They have a unique understanding of the job, and this knowledge is invaluable for finding hazards.
- 6.8.2 Involving employees/subcontractors will help minimize oversights, ensure a quality analysis, and get workers to "buy in" to the solutions because they will share ownership in their safety and health program.



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6.9 **Reviewing our accident history.**

- 6.9.1 Workplace history of accidents and occupational illnesses that needed treatment, losses that required repair or replacement, and any "near misses" will be reviewed with our employees.
- 6.9.2 Events in which an accident or loss did not occur, but could have are indicators that the existing hazard controls (if any) may not be adequate and deserve more scrutiny.

6.10 Conduct a preliminary job review.

- 6.10.1 Discuss with our employees the hazards they know exist in their current work and surroundings.
- 6.10.2 Brainstorm with them for ideas to eliminate or control those hazards.
- 6.10.3 If any hazards exist that pose an immediate danger to an employee's life or health, take immediate action to protect the worker.
- 6.10.4 Any problems that can be corrected easily should be corrected as soon as possible.
- 6.10.4.1 Do not wait to complete your risk assessment.
- 6.10.5 This will demonstrate your commitment to safety and health and enable you to focus on the hazards and jobs that need more study because of their complexity. For those hazards determined to present unacceptable risks, evaluate types of hazard controls.

6.11 List, rank, and set priorities for hazardous jobs.

6.11.1 List jobs with hazards that present unacceptable risks, based on those most likely to occur and with the most severe consequences. These jobs should be our first priority for analysis.

6.12 Outline the steps or tasks.

- 6.12.1 Nearly every job can be broken down into job tasks or steps. When beginning a risk assessment, watch the employee perform the job and list each step as the worker takes it.
- 6.12.2 Be sure to record enough information to describe each job action without getting overly detailed. Avoid making the breakdown of steps so detailed that it becomes unnecessarily long or so broad that it does not include basic steps.
- 6.12.3 You may find it valuable to get input from other workers who have performed the same job.
- 6.12.4 Later, review the job steps with the employee to make sure you have not omitted something.
- 6.12.5 Point out that you are evaluating the job itself, not the employee's job performance. Include the employee in all phases of the analysis—from reviewing the job steps and procedures to discussing uncontrolled hazards and recommended solutions.
- 6.12.6 Sometimes, in conducting a risk assessment, it may be helpful to photograph or videotape the worker performing the job. These visual records can be handy references when doing a more detailed analysis of the work.



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7 How to Identify Workplace Hazards

- 7.1 A risk assessment is an exercise in detective work. Your goal is to discover the following:
- 7.1.1 What can go wrong?
- 7.1.2 What are the consequences?
- 7.1.3 How could it arise?
- 7.1.4 What are other contributing factors?
- 7.1.5 How likely is it that the hazard will occur?
- 7.2 To make your risk assessment useful, document the answers to these questions in a consistent manner.
- 7.3 Describing a hazard in this way helps to ensure that your efforts to eliminate the hazard and implement hazard controls help target the most important contributors to the hazard.
- 7.4 Good hazard scenarios describe:
- 7.4.1 Where it is happening (environment),
- 7.4.2 Who or what it is happening to (exposure),
- 7.4.3 What precipitates the hazard (trigger),
- 7.4.4 The outcome that would occur should it happen (consequence) and
- 7.4.5 Any other contributing factors.
- 7.5 Use the risk assessment form at the end of this policy to organize your information to provide these details.
- 7.6 Rarely is a hazard a simple case of one singular cause resulting in one singular effect.
- 7.7 More frequently, many contributing factors tend to line up in a certain way to create the hazard.

8 Hazard Scenario

- 8.1 In the metal shop (environment), while clearing a snag (trigger), a worker's hand (exposure) comes into contact with a rotating pulley. It pulls his hand into the machine and severs his fingers (consequences) quickly.
- 8.2 To perform a risk assessment, you would ask:
- 8.2.1 What can go wrong?
- 8.2.1.1 The worker's hand could come into contact with a rotating object that "catches" it and pulls it into the machine.
- 8.2.2 What are the consequences?
- 8.2.2.1 The worker could receive a severe injury and lose fingers and hands.
- 8.2.3 How could it happen?
- 8.2.3.1 The accident could happen as a result of the worker trying to clear a snag during operations or as part of a maintenance activity while the pulley is operating. Obviously, this hazard scenario could not occur if the pulley is not rotating.
- 8.2.4 What are other contributing factors?



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- 8.2.4.1 This hazard occurs very quickly. It does not give the worker much opportunity to recover or prevent it once his hand comes into contact with the pulley.
- 8.2.4.2 This is an important factor, because it helps you determine the severity and likelihood of an accident when selecting appropriate hazard controls. Unfortunately, experience has shown that training is not very effective in hazard control when triggering events happen quickly because humans can react only so quickly.
- 8.2.5 How likely is it that the hazard will occur?
- 8.2.5.1 This determination requires some judgment. If there have been "near-misses" or actual cases, then the likelihood of a recurrence would be considered high. If the pulley is exposed and easily accessible, that also is a consideration. In the example, the likelihood that the hazard will occur is high because there is no guard preventing contact, and the operation is performed while the machine is running. By following the steps in this example, you can organize your hazard analysis activities.
- 8.3 The examples that follow show how a risk assessment can be used to identify the existing or potential hazards for each basic step involved in grinding iron castings.
- 8.4 Grinding Iron Castings:
- 8.4.1 Job Steps:
- 8.4.1.1 Step 1. Reach into metal box to right of machine, grasp casting, and carry to wheel.
- 8.4.1.2 Step 2. Push casting against wheel to grind off burr.
- 8.4.1.3 Step 3. Place finished casting in box to left of machine.

9 Risk Assessment

- 9.1 It is a requirement of JDM Janitorial Inc. that all risks/hazards must be addressed and mitigated using the corresponding Risk Assessment forms.
- 9.2 Supervisors and their designees are responsible for completing the risk assessment forms.
- 9.3 The form is designed to describe:
- 9.3.1 The task,
- 9.3.2 The hazard and
- 9.3.3 How to control the hazard.

10 Hierarchy of Controls

- 10.1 It is a requirement of JDM Janitorial Inc. that hierarchy of controls must be used to mitigate hazards.
- 10.1.1 When a hazard is identified, first attempt to eliminate the hazard.
- 10.1.2 If elimination is not practicable, use engineering controls.
- 10.1.3 If engineering controls are not practicable, implement administrative controls.



١	Risk Assessment	Reference: www.OSHA.gov	
	(Identification of Hazards)		
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10.1.4 If the hazard cannot be adequately controlled using engineering and/or administrative controls, employees must use Personal Protective Equipment.

- 10.1.5 A combination of engineering controls, administrative controls, and Personal Protective Equipment is usually best.
- 10.2 Lessons Learned shall be incorporated into the risk assessment process using plan-do-check-act.

11 Risk Assessment Form

Risk Assessment Form					Risk Level:	
Job Location:	Metal Shop	Date:		Analyst:	Connie Holgui	n
Task Description:						
Worker reaches into metal box to the right of the machine, grasps a 15-pound casting and carries it to grinding wheel. Worker grinds 20 to 30 castings per hour.						
Hazard Descrip	otion:					
Picking up a casting, the employee could drop it onto his foot. The casting's weight and height could seriously injure the worker's foot or toes.						
Hazard Contro	ls:					
1. Remove cas	tings from the box and pla	ace then	n on a table n	ext to the	grinder.	
2. Wear steel-toe shoes with arch protection.						
3. Change protective gloves that allow a better grip.						
4. Use a device	e to pick up castings.					



	Risk Assessment (Identification of Hazards)	Reference: www.OSHA.g		
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Risk Assessme	nt Form				Risk Level:	
Job Location:	Metal Shop	Date:		Analyst:	Connie Holgui	n
Task Description	on:					
	s into metal box to the ri . Worker grinds 20 to 30	-		rasps a 15	-pound castin	g and carries it to
Hazard Descrip	tion:					
Castings have sharp burrs and edges that can cause severe lacerations.						
Hazard Controls:						
1. Use a device such as a clamp to pick up castings.						
2. Wear cut-resistant gloves that allow a good grip and fit tightly to minimize the chance that they will get caught in grinding wheel.						



\	Risk Assessment (Identification of Hazards)	Reference: www.OSHA.gov		
ĺ	Safety Coordinator	y Coordinator Connie Holguin		
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Risk Assessmer	nt Form			R	isk Level:	
Job Location:	Metal Shop	Date:		Analyst:	Connie Holgui	in
Task Descriptio	on:					
	s into metal box to the rig . Worker grinds 20 to 30	-		rasps a 15-p	ound castin	g and carries it to
Hazard Descrip	tion:					
Reaching, twisting, and lifting 15-pound castings from the floor could result in a muscle strain to the lower back.						
Hazard Control	s:					
1. Move castings from the ground and place them closer to the work zone to minimize lifting. Ideally, place them at waist height or on an adjustable platform or pallet.						
2. Train workers not to twist while lifting and reconfigure work stations to minimize twisting during lifts.						



Risk Assessment (Identification of Hazards)	Reference: www.OSHA.gov	
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12 Risk Analysis Matrix

Consequences

Risk Analysis Matrix	Insignificant (1) No injuries – minimal financial loss	Minor (2) First aid treatment – medium financial loss	Moderate (3) Medical treatment – high financial loss	Major (4) Hospital – large financial loss	Catastrophic (5) Death – massive financial loss
Almost certain (5) Often occurs - once a week	Moderate (5)	High (10)	High (15)	Catastrophic (20)	Catastrophic (25)
Likely (4) Could easily happen – once a month	Moderate (4)	Moderate (8)	High (12)	Catastrophic (16)	Catastrophic (20)
Possible (3) Could happen or known it to happen – once a year	Low (3)	Moderate (6)	Moderate (9)	High (12)	High (15)
Unlikely (2) Hasn't happened yet but could – once every 10 years	Low (2)	Moderate (4)	Moderate (6)	Moderate (8)	High (10)
Rare (1) Conceivable but only on extreme circumstances – once in 100 years	Low (1)	Low (2)	Low (3)	Moderate (4)	Moderate (5)



1	Risk Assessment	Reference: www.OSHA.g	ov	*
*	(Identification of Hazards)			
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CHAPTER 33

1 Scaffolds Program

1.1 JDM Janitorial Inc. has developed the following policy on Scaffolds to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Certification training.
- 2.2 PPE: Safety vests, fall protection, hard hats, work boots, safety goggles, work gloves.

3 Competent Person

- 3.1 Connie Holguin is the competent person responsible for the program.
- 3.2 It is the responsibility of the competent person to ensure that scaffolds are inspected and safe before use.
- 3.3 Any equipment deemed unsafe must be tagged out by the competent person and must be complied with.
- 3.4 Only qualified and competent personnel are allowed to modify scaffolding systems.
- 3.5 A tagging system shall be utilized by competent persons to identify unsafe equipment or conditions.
- 3.6 All company employees must comply with the tagging system warnings.

4 Training

- 4.1 Training will be conducted by Connie Holguin or their competent designee for employees whose job activities involve the use of Scaffolds.
- 4.2 The training will cover the fall, falling objects, and electrical hazards of the work space.
- 4.2.1 The procedures for mitigating and controlling electrical hazards and the appropriate procedures for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being utilized.
- 4.2.2 The proper use of scaffolding and how to properly handle materials while on the scaffold;
- 4.2.3 The maximum intended load and the maximum load carrying capabilities of the scaffold; and
- 4.2.4 The requirements from the regulatory standard that are applicable to the operations.
- 4.3 Retraining is required where:
- 4.4 Equipment present a hazard about which an employee has not been previously trained,



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- 4.5 An employee's work involving scaffolds indicate that the he/she has not retained the training
- 4.6 Changes at the worksite present a new hazard an employee(s) has not been previously trained.
- 4.7 Changes in the types of:
- 4.7.1.1 Scaffolds,
- 4.7.1.2 Fall protection,
- 4.7.1.3 Falling object protection.

5 Capacity

- 5.1 It is a requirement of JDM Janitorial Inc. that each scaffold and scaffold component must support without failure its own weight and at least 4 times the maximum intended load applied or transmitted to it.
- 5.2 Scaffolds will be designed by a competent person and will be constructed and loaded in accordance with that design. Scaffolds must not be overloaded.
- 5.3 Direct connections to roofs and floors, and counterweights used to balance adjustable suspension scaffolds, will be capable of resisting at least 4 times the tipping moment imposed by the scaffold operating at the rated load of the hoist, or 1.5 (minimum) times the tipping moment imposed by the scaffold operating at the stall load of the hoist, whichever is greater.
- 5.4 Each suspension rope, including connecting hardware, used on non-adjustable suspension scaffolds must be capable of supporting, without failure, at least 6 times the maximum intended load applied or transmitted to that rope.
- 5.5 Each suspension rope, including connecting hardware, used on adjustable suspension scaffolds must be capable of supporting, without failure, at least 6 times the maximum intended load applied or transmitted to that rope with the scaffold operating at either the rated load of the hoist, or 2 (minimum) times the stall load of the hoist, whichever is greater.
- 5.6 The stall load of any scaffold hoist must not exceed 3 times its rated load.

6 Scaffold Platform Construction

- 6.1 Each platform on all working levels of scaffolds must be fully planked or decked between the front uprights and the guardrail supports as follows:
- 6.1.1 Each platform unit (e.g., scaffold plank, fabricated plank, fabricated deck, or fabricated platform) must be installed so that the space between adjacent units and the space between the platform and the uprights is no more than 1 inch (2.5 cm) wide, except where the employer can demonstrate that a wider space is necessary (for example, to fit around uprights when side brackets are used to extend the width of the platform).



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- 6.1.2 Where JDM Janitorial Inc. makes the demonstration provided for in this section, the platform will be planked or decked as fully as possible and the remaining open space between the platform and the uprights must not exceed 9 1/2 inches (24.1 cm).
- 6.1.2.1 The requirement in paragraph 6.1 to provide full planking or decking does not apply to platforms used solely as walkways or solely by employees performing scaffold erection or dismantling.
- 6.1.2.2 In these situations, only the planking that the employer establishes is necessary to provide safe working conditions is required.
- 6.1.3 Each scaffold platform and walkway must be at least 18 inches (46 cm) wide.
- 6.1.4 Each ladder jack scaffold, top plate bracket scaffold, roof bracket scaffold, and pump jack scaffold must be at least 12 inches (30 cm) wide. There is no minimum width requirement for boatswains' chairs.
- 6.1.4.1 Note to paragraph 6.1.4 Pursuant to an administrative stay effective November 29, 1996 and published in the Federal Register on November 25, 1996, the requirement in 6.1.4 that roof bracket scaffolds be at least 12 inches wide is stayed until November 25, 1997 or until rulemaking regarding the minimum width of roof bracket scaffolds has been completed, whichever is later.
- 6.1.5 Where scaffolds must be used in areas that are so narrow that platforms and walkways cannot be at least 18 inches (46 cm) wide, such platforms and walkways will be as wide as feasible, and employees on those platforms and walkways will be protected from fall hazards by the use of guardrails and/or personal fall arrest systems.
- 6.1.6 The front edge of all platforms must not be more than 14 inches (36 cm) from the face of the work, unless guardrail systems are erected along the front edge and/or personal fall arrest systems are used in accordance with paragraph (g) of this section to protect employees from falling.
- 6.1.7 The maximum distance from the face for outrigger scaffolds must be 3 inches (8 cm).
- 6.1.8 The maximum distance from the face for plastering and lathing operations must be 18 inches (46 cm).
- 6.1.9 Each end of a platform, unless cleated or otherwise restrained by hooks or equivalent means, must extend over the centerline of its support at least 6 inches (15 cm).
- 6.1.10 Each end of a platform 10 feet or less in length must not extend over its support more than 12 inches (30 cm) unless the platform is designed and installed so that the cantilevered portion of the platform is able to support employees and/or materials without tipping, or has guardrails which block employee access to the cantilevered end.

ANITORIAL SUPERATION

JDM Janitorial Inc.

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- 6.1.11 Each platform greater than 10 feet in length must not extend over its support more than 18 inches (46 cm), unless it is designed and installed so that the cantilevered portion of the platform is able to support employees without tipping, or has guardrails which block employee access to the cantilevered end.
- 6.2 On scaffolds where scaffold planks are abutted to create a long platform, each abutted end must rest on a separate support surface. This provision does not preclude the use of common support members, such as "T" sections, to support abutting planks, or hook on platforms designed to rest on common supports.
- 6.3 On scaffolds where platforms are overlapped to create a long platform, the overlap must occur only over supports, and must not be less than 12 inches (30 cm) unless the platforms are nailed together or otherwise restrained to prevent movement.
- 6.4 At all points of a scaffold where the platform changes direction, such as turning a corner, any platform that rests on a bearer at an angle other than a right angle must be laid first, and platforms which rest at right angles over the same bearer must be laid second, on top of the first platform.
- 6.5 Wood platforms must not be covered with opaque finishes, except that platform edges may be covered or marked for identification. Platforms may be coated periodically with wood preservatives, fire-retardant finishes, and slip-resistant finishes; however, the coating may not obscure the top or bottom wood surfaces.
- 6.6 Scaffold components manufactured by different manufacturers must not be intermixed unless the components fit together without force and the scaffold's structural integrity is maintained by the user. Scaffold components manufactured by different manufacturers must not be modified in order to intermix them unless a competent person determines the resulting scaffold is structurally sound.
- 6.7 Scaffold components made of dissimilar metals must not be used together unless a competent person has determined that galvanic action will not reduce the strength of any component to a level below that required.

7 Supported Scaffolds

- 7.1 Supported scaffolds with a height to base width (including outrigger supports, if used) ratio of more than four to one (4:1) must be restrained from tipping by guying, tying, bracing, or equivalent means, as follows:
- 7.2 Guys, ties, and braces must be installed at locations where horizontal members support both inner and outer legs.



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- 7.2.1 Guys, ties, and braces must be installed according to the scaffold manufacturer's recommendations or at the closest horizontal member to the 4:1 height and be repeated vertically at locations of horizontal members every 20 feet (6.1 m) or less thereafter for scaffolds 3 feet (0.91 m) wide or less, and every 26 feet (7.9 m) or less thereafter for scaffolds greater than 3 feet (0.91 m) wide. The top guy, tie or brace of completed scaffolds must be placed no further than the 4:1 height from the top. Such guys, ties and braces must be installed at each end of the scaffold and at horizontal intervals not to exceed 30 feet (9.1 m) (measured from one end [not both] towards the other).
- 7.2.2 Ties, guys, braces, or outriggers must be used to prevent the tipping of supported scaffolds in all circumstances where an eccentric load, such as a cantilevered work platform, is applied or is transmitted to the scaffold.
- 7.3 Supported scaffold poles, legs, posts, frames, and uprights must bear on base plates and mud sills or other adequate firm foundation.
- 7.3.1 Footings must be level, sound, rigid, and capable of supporting the loaded scaffold without settling or displacement.
- 7.3.2 Unstable objects must not be used to support scaffolds or platform units.
- 7.3.3 Unstable objects must not be used as working platforms.
- 7.4 Front-end loaders and similar pieces of equipment must not be used to support scaffold platforms unless they have been specifically designed by the manufacturer for such use.
- 7.5 Fork-lifts must not be used to support scaffold platforms unless the entire platform is attached to the fork and the fork-lift is not moved horizontally while the platform is occupied.
- 7.6 Supported scaffold poles, legs, posts, frames, and uprights must be plumb and braced to prevent swaying and displacement.

8 Suspension Scaffolds

- 8.1 All suspension scaffold support devices, such as outrigger beams, cornice hooks, parapet clamps, and similar devices, must rest on surfaces capable of supporting at least 4 times the load imposed on them by the scaffold operating at the rated load of the hoist (or at least 1.5 times the load imposed on them by the scaffold at the stall capacity of the hoist, whichever is greater).
- 8.2 Suspension scaffold outrigger beams, when used, must be made of structural metal or equivalent strength material, and must be restrained to prevent movement.
- 8.3 The inboard ends of suspension scaffold outrigger beams must be stabilized by bolts or other direct connections to the floor or roof deck, or they must have their inboard ends stabilized by counterweights, except masons' multi-point adjustable suspension scaffold outrigger beams must not be stabilized by counterweights.



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- 8.4 Before the scaffold is used, direct connections must be evaluated by a competent person who must confirm, based on the evaluation, that the supporting surfaces are capable of supporting the loads to be imposed. In addition, masons' multi-point adjustable suspension scaffold connections must be designed by an engineer experienced in such scaffold design.
- 8.5 Counterweights must be made of non-flowable material. Sand, gravel and similar materials that can be easily dislocated must not be used as counterweights.
- 8.5.1 Only those items specifically designed as counterweights must be used to counterweight scaffold systems. Construction materials such as, but not limited to, masonry units and rolls of roofing felt, must not be used as counterweights.
- 8.5.2 Counterweights must be secured by mechanical means to the outrigger beams to prevent accidental displacement.
- 8.5.3 Counterweights must not be removed from an outrigger beam until the scaffold is disassembled.
- 8.6 Outrigger beams which are not stabilized by bolts or other direct connections to the floor or roof deck must be secured by tiebacks.
- 8.6.1 Tiebacks must be equivalent in strength to the suspension ropes.
- 8.6.2 Outrigger beams must be placed perpendicular to its bearing support (usually the face of the building or structure). However, where the employer can demonstrate that it is not possible to place an outrigger beam perpendicular to the face of the building or structure because of obstructions that cannot be moved, the outrigger beam may be placed at some other angle, provided opposing angle tiebacks are used.
- 8.6.3 Tiebacks must be secured to a structurally sound anchorage on the building or structure. Sound anchorages include structural members, but do not include standpipes, vents, other piping systems, or electrical conduit.
- 8.6.4 Tiebacks must be installed perpendicular to the face of the building or structure, or opposing angle tiebacks must be installed. Single tiebacks installed at an angle are prohibited.
- 8.7 Suspension scaffold outrigger beams must be:
- 8.7.1 Provided with stop bolts or shackles at both ends;
- 8.7.2 Securely fastened together with the flanges turned out when channel iron beams are used in place of I-beams;
- 8.7.3 Installed with all bearing supports perpendicular to the beam center line;
- 8.7.4 Set and maintained with the web in a vertical position; and
- 8.7.5 When an outrigger beam is used, the shackle or clevis with which the rope is attached to the outrigger beam must be placed directly over the center line of the stirrup.
- 8.8 Suspension scaffold support devices such as cornice hooks, roof hooks, roof irons, parapet clamps, or similar devices must be:



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- 8.8.1 Made of steel, wrought iron, or materials of equivalent strength;
- 8.8.2 Supported by bearing blocks; and
- 8.8.3 Secured against movement by tiebacks installed at right angles to the face of the building or structure, or opposing angle tiebacks must be installed and secured to a structurally sound point of anchorage on the building or structure. Sound points of anchorage include structural members, but do not include standpipes, vents, other piping systems, or electrical conduit.
- 8.9 Tiebacks must be equivalent in strength to the hoisting rope.
- 8.10 When winding drum hoists are used on a suspension scaffold, they must contain not less than four wraps of the suspension rope at the lowest point of scaffold travel. When other types of hoists are used, the suspension ropes must be long enough to allow the scaffold to be lowered to the level below without the rope end passing through the hoist, or the rope end must be configured or provided with means to prevent the end from passing through the hoist.
- 8.11 The use of repaired wire rope as suspension rope is prohibited.
- 8.12 Wire suspension ropes must not be joined together except through the use of eye splice thimbles connected with shackles or coverplates and bolts.
- 8.13 The load end of wire suspension ropes must be equipped with proper size thimbles and secured by eyesplicing or equivalent means.
- 8.14 Ropes must be inspected for defects by a competent person prior to each workshift and after every occurrence which could affect a rope's integrity. Ropes must be replaced if any of the following conditions exist:
- 8.14.1 Any physical damage which impairs the function and strength of the rope.
- 8.14.2 Kinks that might impair the tracking or wrapping of rope around the drum(s) or sheave(s).
- 8.14.3 Six randomly distributed broken wires in one rope lay or three broken wires in one strand in one rope lay.
- 8.14.4 Abrasion, corrosion, scrubbing, flattening or peening causing loss of more than one-third of the original diameter of the outside wires.
- 8.14.5 Heat damage caused by a torch or any damage caused by contact with electrical wires.
- 8.14.6 Evidence that the secondary brake has been activated during an overspeed condition and has engaged the suspension rope.
- 8.14.7 Swaged attachments or spliced eyes on wire suspension ropes must not be used unless they are made by the wire rope manufacturer or a qualified person.
- 8.15 When wire rope clips are used on suspension scaffolds:
- 8.15.1 There must be a minimum of 3 wire rope clips installed, with the clips a minimum of 6 rope diameters apart;



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- 8.15.2 Clips must be installed according to the manufacturer's recommendations;
- 8.15.3 Clips must be retightened to the manufacturer's recommendations after the initial loading;
- 8.15.4 Clips must be inspected and retightened to the manufacturer's recommendations at the start of each workshift thereafter;
- 8.15.5 U-bolt clips must not be used at the point of suspension for any scaffold hoist;
- 8.15.5.1 When U-bolt clips are used, the U-bolt must be placed over the dead end of the rope, and the saddle must be placed over the live end of the rope.
- 8.16 Suspension scaffold power-operated hoists and manual hoists must be tested by a qualified testing laboratory.
- 8.17 Gasoline-powered equipment and hoists must not be used on suspension scaffolds.
- 8.18 Gears and brakes of power-operated hoists used on suspension scaffolds must be enclosed.
- 8.19 In addition to the normal operating brake, suspension scaffold power-operated hoists and manually operated hoists must have a braking device or locking pawl which engages automatically when a hoist makes either of the following uncontrolled movements: an instantaneous change in momentum or an accelerated overspeed.
- 8.20 Manually operated hoists must require a positive crank force to descend.
- 8.21 Two-point and multi-point suspension scaffolds must be tied or otherwise secured to prevent them from swaying, as determined to be necessary based on an evaluation by a competent person. Window cleaners' anchors must not be used for this purpose.
- 8.22 Devices whose sole function is to provide emergency escape and rescue must not be used as working platforms. This provision does not preclude the use of systems which are designed to function both as suspension scaffolds and emergency systems.

9 Access

- 9.1 It is the determination of JDM Janitorial Inc. to provide safe means of access for each employee erecting or dismantling a scaffold where the provision of safe access is feasible and does not create a greater hazard. The employer must have a competent person determine whether it is feasible or would pose a greater hazard to provide, and have employees use a safe means of access. This determination must be based on site conditions and the type of scaffold being erected or dismantled.
- 9.2 When scaffold platforms are more than 2 feet (0.6 m) above or below a point of access, portable ladders, hook-on ladders, attachable ladders, stair towers (scaffold stairways/towers), stairway-type ladders (such as ladder stands), ramps, walkways, integral prefabricated scaffold access, or direct access from another scaffold, structure, personnel hoist, or similar surface must be used. Crossbraces must not be used as a means of access.
- 9.3 Portable, hook-on, and attachable ladders (Additional requirements for the proper construction and use of portable ladders are contained in subpart X of this part -- Stairways and Ladders):



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- 9.4 Portable, hook-on, and attachable ladders must be positioned so as not to tip the scaffold;
- 9.5 Hook-on and attachable ladders must be positioned so that their bottom rung is not more than 24 inches (61 cm) above the scaffold supporting level;
- 9.6 When hook-on and attachable ladders are used on a supported scaffold more than 35 feet (10.7 m) high, they must have rest platforms at 35-foot (10.7 m) maximum vertical intervals.
- 9.7 Hook-on and attachable ladders must be specifically designed for use with the type of scaffold used;
- 9.8 Hook-on and attachable ladders must have a minimum rung length of 11 1/2 inches (29 cm); and
- 9.9 Hook-on and attachable ladders must have uniformly spaced rungs with a maximum spacing between rungs of 16 3/4 inches.
- 9.10 Stairway-type ladders must:
- 9.10.1 Be positioned such that their bottom step is not more than 24 inches (61 cm) above the scaffold supporting level;
- 9.10.2 Be provided with rest platforms at 12 foot (3.7 m) maximum vertical intervals;
- 9.10.3 Have a minimum step width of 16 inches (41 cm), except that mobile scaffold stairway-type ladders must have a minimum step width of 11 1/2 inches (30 cm); and
- 9.10.4 Have slip-resistant treads on all steps and landings.
- 9.11 Stair towers (scaffold stairway/towers) must be positioned such that their bottom step is not more than 24 inches (61 cm.) above the scaffold supporting level.
- 9.12 A stair rail consisting of a top rail and a midtrial must be provided on each side of each scaffold stairway.
- 9.13 The top rail of each stair rail system must also be capable of serving as a handrail, unless a separate handrail is provided.
- 9.14 Handrails, and top rails that serve as handrails, must provide an adequate handhold for employees grasping them to avoid falling.
- 9.15 Stair rail systems and handrails must be surfaced to prevent injury to employees from punctures or lacerations, and to prevent snagging of clothing.
- 9.16 The ends of stair rail systems and handrails must be constructed so that they do not constitute a projection hazard.
- 9.17 Handrails, and top rails that are used as handrails, must be at least 3 inches (7.6 cm) from other objects.
- 9.18 Stair rails must be not less than 28 inches (71 cm) nor more than 37 inches (94 cm) from the upper surface of the stair rail to the surface of the tread, in line with the face of the riser at the forward edge of the tread.
- 9.19 A landing platform at least 18 inches (45.7 cm) wide by at least 18 inches (45.7 cm) long must be provided at each level.
- 9.20 Each scaffold stairway must be at least 18 inches (45.7 cm) wide between stair rails.

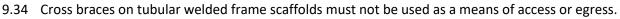


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- 9.21 Treads and landings must have slip-resistant surfaces.
- 9.22 Stairways must be installed between 40 degrees and 60 degrees from the horizontal.
- 9.23 Guardrails meeting the requirements of paragraph (g)(4) of this section must be provided on the open sides and ends of each landing.
- 9.24 Riser height must be uniform, within 1/4 inch, (0.6 cm) for each flight of stairs. Greater variations in riser height are allowed for the top and bottom steps of the entire system, not for each flight of stairs.
- 9.25 Tread depth must be uniform, within 1/4 inch, for each flight of stairs.
- 9.26 Ramps and walkways 6 feet (1.8 m) or more above lower levels must have guardrail systems which comply with subpart M of this part -- Fall Protection;
- 9.27 No ramp or walkway must be inclined more than a slope of one (1) vertical to three (3) horizontal (20 degrees above the horizontal).
- 9.28 If the slope of a ramp or a walkway is steeper than one (1) vertical in eight (8) horizontal, the ramp or walkway must have cleats not more than fourteen (14) inches (35 cm) apart which are securely fastened to the planks to provide footing.
- 9.29 Integral prefabricated scaffold access frames must:
- 9.29.1 Be specifically designed and constructed for use as ladder rungs;
- 9.29.2 Have a rung length of at least 8 inches (20 cm);
- 9.29.3 Not be used as work platforms when rungs are less than 11 1/2 inches in length, unless each affected employee uses fall protection, or a positioning device, which complies with 1926.502;
- 9.29.4 Be uniformly spaced within each frame section;
- 9.29.5 Be provided with rest platforms at 35-foot (10.7 m) maximum vertical intervals on all supported scaffolds more than 35 feet (10.7 m) high; and
- 9.29.6 Have a maximum spacing between rungs of 16 3/4 inches (43 cm). Non-uniform rung spacing caused by joining end frames together is allowed, provided the resulting spacing does not exceed 16 3/4 inches (43 cm).
- 9.30 Steps and rungs of ladder and stairway type access must line up vertically with each other between rest platforms.
- 9.31 Direct access to or from another surface must be used only when the scaffold is not more than 14 inches (36 cm) horizontally and not more than 24 inches (61 cm) vertically from the other surface.
- 9.32 Hook-on or attachable ladders must be installed as soon as scaffold erection has progressed to a point that permits safe installation and use.
- 9.33 When erecting or dismantling tubular welded frame scaffolds, (end) frames, with horizontal members that are parallel, level and are not more than 22 inches apart vertically may be used as climbing devices for access, provided they are erected in a manner that creates a usable ladder and provides good hand hold and foot space.



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- 9.35 Employees are prohibited from working on scaffolds covered with snow, ice, or other slippery material except as necessary for removal of such materials.
- 9.36 Where swinging loads are being hoisted onto or near scaffolds such that the loads might contact the scaffold, tag lines or equivalent measures to control the loads must be used.
- 9.37 Suspension ropes supporting adjustable suspension scaffolds must be of a diameter large enough to provide sufficient surface area for the functioning of brake and hoist mechanisms.
- 9.38 Suspension ropes must be shielded from heat-producing processes. When acids or other corrosive substances are used on a scaffold, the ropes must be shielded, treated to protect against the corrosive substances, or must be of a material that will not be damaged by the substance being used.
- 9.39 Work on or from scaffolds is prohibited during storms or high winds unless a competent person has determined that it is safe for employees to be on the scaffold and those employees are protected by a personal fall arrest system or wind screens. Wind screens must not be used unless the scaffold is secured against the anticipated wind forces imposed.
- 9.40 Debris must not be allowed to accumulate on platforms.
- 9.41 Makeshift devices, such as but not limited to boxes and barrels, must not be used on top of scaffold platforms to increase the working level height of employees.
- 9.42 Ladders must not be used on scaffolds to increase the working level height of employees, except on large area scaffolds where employers have satisfied the following criteria:
- 9.43 When the ladder is placed against a structure which is not a part of the scaffold, the scaffold must be secured against the sideways thrust exerted by the ladder;
- 9.44 The platform units must be secured to the scaffold to prevent their movement;
- 9.45 The ladder legs must be on the same platform or other means must be provided to stabilize the
- 9.46 1926.451(f)(15)(iv)
- 9.47 The ladder legs must be secured to prevent them from slipping or being pushed off the platform.
- 9.48 Platforms must not deflect more than 1/60 of the span when loaded.

10 Fall protection

- 10.1 Each employee on a scaffold more than 10 feet (3.1 m) above a lower level must be protected from falling to that lower level.
- 10.2 Each employee on a boatswains' chair, catenary scaffold, float scaffold, needle beam scaffold, or ladder jack scaffold must be protected by a personal fall arrest system;



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- 10.3 Each employee on a single-point or two-point adjustable suspension scaffold must be protected by both a personal fall arrest system and guardrail system;
- 10.4 Each employee on a crawling board (chicken ladder) must be protected by a personal fall arrest system, a guardrail system (with minimum 200 pound toprail capacity), or by a three-fourth inch (1.9 cm) diameter grabline or equivalent handhold securely fastened beside each crawling board;
- 10.5 Each employee on a self-contained adjustable scaffold must be protected by a guardrail system (with minimum 200 pound toprail capacity) when the platform is supported by the frame structure, and by both a personal fall arrest system and a guardrail system (with minimum 200 pound toprail capacity) when the platform is supported by ropes;
- 10.6 Each employee on a walkway located within a scaffold must be protected by a guardrail system (with minimum 200 pound toprail capacity) installed within 9 1/2 inches (24.1 cm) of and along at least one side of the walkway.
- 10.7 Each employee performing overhand bricklaying operations from a supported scaffold must be protected from falling from all open sides and ends of the scaffold (except at the side next to the wall being laid) by the use of a personal fall arrest system or guardrail system (with minimum 200 pound toprail capacity).
- 10.8 For all scaffolds not otherwise specified in paragraphs (g)(1)(i) through (g)(1)(vi) of this section, each employee must be protected by the use of personal fall arrest systems or guardrail systems meeting the requirements of paragraph (g)(4) of this section.
- 10.9 Effective September 2, 1997, the employer must have a competent person determine the feasibility and safety of providing fall protection for employees erecting or dismantling supported scaffolds. Employers are required to provide fall protection for employees erecting or dismantling supported scaffolds where the installation and use of such protection is feasible and does not create a greater hazard.
- 10.10 Vertical lifelines, independent support lines, and suspension ropes must not be attached to each other, nor must they be attached to or use the same point of anchorage, nor must they be attached to the same point on the scaffold or personal fall arrest system.
- 10.11 Guardrail systems installed to meet the requirements of this section must comply with the following provisions (guardrail systems built in accordance with Appendix A to this subpart will be deemed to meet the requirements of paragraphs (g)(4)(vii), (viii), and (ix) of this section):
- 10.12 Guardrail systems must be installed along all open sides and ends of platforms. Guardrail systems must be installed before the scaffold is released for use by employees other than erection/dismantling crews.
- 10.13 When midrails, screens, mesh, intermediate vertical members, solid panels, or equivalent structural members are used, they must be installed between the top edge of the guardrail system and the scaffold platform.



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- 10.14 When midrails are used, they must be installed at a height approximately midway between the top edge of the guardrail system and the platform surface.
- 10.15 When screens and mesh are used, they must extend from the top edge of the guardrail system to the scaffold platform, and along the entire opening between the supports.
- 10.16 When intermediate members (such as balusters or additional rails) are used, they must not be more than 19 inches (48 cm) apart.
- 10.17 Each toprail or equivalent member of a guardrail system must be capable of withstanding, without failure, a force applied in any downward or horizontal direction at any point along its top edge of at least 100 pounds (445 n) for guardrail systems installed on single-point adjustable suspension scaffolds or two-point adjustable suspension scaffolds, and at least 200 pounds (890 n) for guardrail Suspension scaffold hoists and non-walk-through stirrups may be used as end guardrails, if the space between the hoist or stirrup and the side guardrail or structure does not allow passage of an employee to the end of the scaffold.
- 10.18 Guardrails must be surfaced to prevent injury to an employee from punctures or lacerations, and to prevent snagging of clothing.
- 10.19 The ends of all rails must not overhang the terminal posts except when such overhang does not constitute a projection hazard to employees.
- 10.20 Steel or plastic banding must not be used as a toprail or midrail.
- 10.21 Manila or plastic (or other synthetic) rope being used for toprails or midrails must be inspected by a competent person as frequently as necessary to ensure that it continues to meet the strength requirements.
- 10.22 Crossbracing is acceptable in place of a midrail when the crossing point of two braces is between 20 inches (0.5 m) and 30 inches (0.8 m) above the work platform or as a toprail when the crossing point of two braces is between 38 inches (0.97 m) and 48 inches (1.3 m) above the work platform. The end points at each upright must be no more than 48 inches (1.3 m) apart.

11 Falling Object Protection

- 11.1 In addition to wearing hardhats each employee on a scaffold must be provided with additional protection from falling hand tools, debris, and other small objects through the installation of toeboards, screens, or guardrail systems, or through the erection of debris nets, catch platforms, or canopy structures that contain or deflect the falling objects. When the falling objects are too large, heavy or massive to be contained or deflected by any of the above-listed measures, the employer must place such potential falling objects away from the edge of the surface from which they could fall and must secure those materials as necessary to prevent their falling.
- 11.2 Where there is a danger of tools, materials, or equipment falling from a scaffold and striking employees below, the following provisions apply:



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11.2.1 The area below the scaffold to which objects can fall must be barricaded, and employees must not be permitted to enter the hazard area; or

- 11.2.2 A toeboard must be erected along the edge of platforms more than 10 feet (3.1 m) above lower levels for a distance sufficient to protect employees below, except on float (ship) scaffolds where an edging of 3/4 x 1 1/2 inch (2 x 4 cm) wood or equivalent may be used in lieu of toeboards;
- 11.2.3 Where tools, materials, or equipment are piled to a height higher than the top edge of the toeboard, paneling or screening extending from the toeboard or platform to the top of the guardrail must be erected for a distance sufficient to protect employees below; or
- 11.2.4 A guardrail system must be installed with openings small enough to prevent passage of potential falling objects; or
- 11.2.5 A canopy structure, debris net, or catch platform strong enough to withstand the impact forces of the potential falling objects must be erected over the employees below.
- 11.3 Canopies, when used for falling object protection, must comply with the following criteria:
- 11.4 Canopies must be installed between the falling object hazard and the employees.
- 11.4.1 When canopies are used on suspension scaffolds for falling object protection, the scaffold must be equipped with additional independent support lines equal in number to the number of points supported, and equivalent in strength to the strength of the suspension ropes.
- 11.4.2 Independent support lines and suspension ropes must not be attached to the same points of anchorage.
- 11.5 Where used, toeboards must be:
- 11.5.1 Capable of withstanding, without failure, a force of at least 50 pounds (222 n) applied in any downward or horizontal direction at any point along the toeboard (toeboards built in accordance with Appendix A to this subpart will be deemed to meet this requirement); and
- 11.5.2 At least three and one-half inches (9 cm) high from the top edge of the toeboard to the level of the walking/working surface. Toeboards must be securely fastened in place at the outermost edge of the platform and have not more than 1/4 inch (0.7 cm) clearance above the walking/working surface. Toeboards must be solid or with openings not over one inch (2.5 cm) in the greatest dimension.

12 Overhead Lines

- 12.1 It is a requirement of JDM Janitorial Inc. that scaffolds must not be erected, used, dismantled, altered, or moved such that they or any conductive material handled on them might come closer to exposed and energized power lines than as follows:
- 12.1.1 Less than 50 kv- 10 feet,



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12.1.2 More than 50 kv- 10 feet plus 0.4 inches for each 1 kv over 50 kv. This page left blank for printing purposes.



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CHAPTER 34

1 Short Service Employee (SSE) Program

- 1.1 The Short Service Employee (SS)E program applies to employees who have less than six months service with JDM Janitorial Inc. or craft.
- 1.2 The purpose of the program is to ensure that these contractor employees have an initial orientation of safety requirements prior to performing work under direct on-site supervision of a designated contractor employee who also serves as a mentor/trainer.
- 1.3 JDM Janitorial Inc. has developed the following policy on Short Service Employees to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Employee orientation, Awareness training.
- 2.2 PPE: Safety vests, hard hats, work boots, work gloves, eye & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 It is the policy of JDM Janitorial Inc. that an initial employee orientation is required before performing work on locations.
- 4.2 Orientation must be conducted by the person-in-charge and will include the following:
- 4.2.1 Management Safety Commitment,
- 4.2.2 General Safety Rules (and obtain signature),
- 4.2.3 General requirements for personal protective equipment,
- 4.2.4 Injury reporting and medical follow-up procedures,
- 4.2.5 Review regulatory and job skills training specific to immediate job tasks,
- 4.2.6 Required participation in safety meetings and pre-job and JSA process,
- 4.2.7 Site-specific orientation presented by the SSE Mentor.



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- 4.2.7.1 Minimum site-specific orientation will include operations overview, emergency action plan, facility sign-in and sign-out, hazard identification and reporting, SDS information, H2S if applicable, etc.
- 4.3 Short Service Employees (SSE's) will be kept to a minimum on a work location at any given time.

5 Short Service Employee (SSE) Guideline

- 5.1 Prior to starting work, JDM Janitorial Inc. shall notify the host facility (project coordinator, contractor contact, and/or on-site supervisor) if Short Service Employees are present on work crews.
- 5.2 An SSE may only work under the direct on-site supervision of a designated contractor employee who, as one of his or her duties, serves as a mentor/trainer in safety for the SSE. Never Alone.
- 5.2.1 An exception to the mentor/trainer requirement may be granted for non-gang related activities (e.g., welders, heavy equipment operator, truck drivers, etc.) To be eligible for an exception, the employee must have a high level of previous work experience in the same job family.
- 5.2.2 An exception may also be granted for a supervisor with a high level of previous work experience in the same job family.
- 5.2.2.1 The exception request must be submitted in writing and approved by management.
- 5.3 The contractor person-in-charge must notify the company representative of a SSE working on JDM Janitorial Inc.'s premises and provide documentation on the Short Service Employee.
- 5.3.1 Required approval must be received prior to the individual starting work.
- 5.4 SSE's must be easily identified while on our locations. This can be accomplished by using colored hard hats, reflective hat stickers or bands, vests, or any similar means.
- 5.4.1 The method used must be communicated with the host client.
- 5.5 Presence of an SSE will be communicated during morning HSE Meetings and noted on JSA.
- 5.6 A work crew of less than 5 employees may not have more than one Short Service Employee.

6 Roles and Responsibilities

- 6.1 The SSE Mentor who is experienced and knowledgeable will be responsible for overseeing orientation, training and observation of SSE during first six months of employment.
- 6.1.1 The SSE Mentor will coach and supervise work.
- 6.1.2 The SSE's safety will be of highest priority while learning the new job and unfamiliar tasks.
- 6.2 Short Service Employees will be monitored for compliance with health, safety, and environmental policies and procedures.



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- 6.2.1 Once the Short Service Employee has demonstrated competency and compliance with HSE policies and procedures, the contractor may remove the hi-visibility identifier.
- 6.3 The SSE must consult with and listen to the SSE Mentor, and will be responsible for performing work as directed, but always has the responsibility to speak up when and if work is deemed unsafe.

7 Subcontractors

7.1 It is the policy of JDM Janitorial Inc. that subcontractors must manage their Short Service Employees in accordance with the requirements of the Short Service Employee program.

8 General Safety Rules

- 8.1 It is your RIGHT AND OBLIGATION to prevent or cease work for any reason if you are concerned about safety, unsafe conditions, or hazards.
- 8.2 You must report promptly to your supervisor any injury you sustain while at work. You are also encouraged to report accident details that did not result in personal injury or property damage, but could have if the circumstances had been different, via the Near Miss Reporting Process.
- 8.3 NEVER run unless the situation is life threatening.
- 8.4 NEVER engage in scuffling practical joking, or horseplay on the job.
- 8.5 Appropriate hearing protection MUST BE WORN in areas where signs are posted warning of excessive noise levels and in areas where equipment is being operated. Hearing protection must also be worn in posted areas that are suspected of temporary excessive noise.
- 8.6 Safety hard hats MUST be worn on company work sites at all times.
- 8.7 Everyone MUST wear approved safety glasses at all times while on Company work sites where the potential for eye injury exists. The only exception to this is when special-purpose eye protection is used.
- 8.8 Steel toe safety boots MUST be worn on company work sites at all times.
- 8.9 Clothing suited to the work, the weather, and the environment must be worn
- 8.10 Other PPE such as climbing harness for working at heights, face shield and goggles while grinding, proper gloves, etc. will be utilized as per the hazard assessment for that particular job.
- 8.11 Your supervisor or the Company person in charge MUST familiarize you with the following on your initial assignment at a work site:
- 8.11.1 Emergency, fire, and escape procedures (including alarm identification).
- 8.11.2 Potential for hazardous gases such as H2S.
- 8.11.3 Location of survival craft (capsules or other types).
- 8.11.4 Emergency, abandon platform, and man overboard alarms. (Note: Items above are offshore specific.)



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9 General Safety Rules Certification

- 9.1 This is to certify that I have received a copy of the company's General Safety Rules. I have read the rules and understand the contents and agree to abide by these rules.
- 9.2 Also, I agree to visit with my supervisor and understand other applicable safety rules which apply to the specific work I will be performing on company's job sites and premises.
- 9.3 I understand that by safety and the safety of others is my #1 responsibility.
- 9.4 I will not take action until I understand the safe way to perform the tasks assigned to me.
- 9.5 I agree to speak up and as necessary stop any job I recognize as unsafe.

Date:	
Name (print):	
Signature:	
Driver License #	
Employer's Name:	



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CHAPTER 35

1 Spill Prevention & Response Program

- 1.1 Oil spill cleanup workers can face potential hazards from oil byproducts, dispersants, detergents and degreasers.
- 1.2 Drowning, heat illness, falls, as well as encounters with insects, snakes and other wild species native to the impacted areas.
- 1.3 JDM Janitorial Inc. has developed the following policy on Spill Prevention and Response to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, spill kit, hazmat suits, hard hats, safety goggles, respirators.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Training will be provided by JDM Janitorial Inc. for employees whose job activities involve the risk of spilled material.
- 4.2 The training will cover:
- 4.2.1 Proper response procedures for spilled materials,
- 4.2.2 Materials available for use,
- 4.2.3 Proper waste disposal and
- 4.2.4 Communication procedures.
- 4.3 Employee training should include the processes and materials with which they are working, the safety hazards, the practices for preventing spills, and the procedures for responding properly and rapidly to toxic and hazardous materials incidents.



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5 Storage

- 5.1 It is a requirement of JDM Janitorial Inc. that chemical substances must be stored in proper containers to minimize the potential for a spill.
- 5.1.1 Whenever possible, chemicals will be kept in closed containers and stored so they are not exposed to stormwater.
- 5.2 It is a requirement of JDM Janitorial Inc. that good housekeeping practices must be kept in areas where chemicals may be used or stored.
- 5.2.1 This includes, but is not limited to, clean and organized storage, labeling, and secondary containment where necessary.

6 Spill Response Materials

- 6.1 JDM Janitorial Inc. will ensure that an adequate spill kit is readily available when required.
- 6.1.1 Considerations will be made for both the type and quantity of materials.
- 6.2 Spill kits are generally broken down into three different categories; general purpose, oil and hazmat.
- 6.3 Material compatibility of the chemicals with the containers and the container with its environment; keeping substances in closed containers and away from potential receiving waters; good housekeeping including neat and orderly storage of chemicals and prompt removal of spillage.
- 6.4 General Purpose
- 6.4.1 Is designed for both water-based liquids as well as hydrocarbons.
- 6.4.2 General purpose spill kits are made with gray absorbents, making them effective for cleaning up water and hydrocarbons.
- 6.5 Oil Only
- 6.5.1 Contains white absorbents and is designed to clean up hydrocarbons such as oil and gasoline.
- 6.5.2 The absorbents found in this kit float on water for more effective cleanup contact with the hydrocarbons.
- 6.6 Hazmat
- 6.6.1 Is designed for spills involving highly corrosive acids and solvents.
- 6.6.2 Hazmat spill kits contain yellow-colored absorbents.
- 6.7 A material inventory identifying hazardous substances and toxic chemicals should be part of the risk identification and assessment plan and is needed to determine the potential for spills.



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7 Spill Response Procedure

- 7.1 In the event of a fuel, oil, or chemicals spill the following steps should apply:
- 7.1.1 Stop work, shut down equipment.
- 7.1.2 Move personnel to safe area.
- 7.1.3 Identify the substance spilled and refer to SDS for appropriate safety procedures.
- 7.1.4 Conduct a hazard assessment and implement controls.
- 7.1.5 Minimize and safely contain spill.
- 7.1.6 Immediately notify supervisor.
- 7.1.7 Alarm others if lives are in danger.
- 7.2 Contain spill by attempting to stop the flow at the source. Use pails, tarpaulins, barrels, dikes or berms immediately once safe to enter spill area. A shallow excavation may be made to contain or stop the flow of the product. Spills adjacent to or on waterways must be cleaned up as quickly as possible to prevent them from entering the water body.
- 7.3 Once area is safe and spill has been contained start clean up. Sorbent materials may be used to both contain and cleanup spilled material. Ensure traffic is minimized on and around contaminated areas. The use of a vacuum truck may be appropriate to skim off contaminates.
- 7.4 Notification of a discharge must be reported to appropriate personnel to initiate immediate action, formal written reports for review and evaluation by management, and notification as required by law to governmental and environmental agencies.

7.5 Clean up Materials and Tools

- 7.5.1 Spill pads, absorbent materials (warehouse, trucks).
- 7.5.2 Shovels.
- 7.5.3 Sand, dirt etc.
- 7.5.4 Personnel.
- 7.5.5 Pails, tarpaulins, barrels.
- 7.5.6 Safety gloves and goggles.



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7 Spill Response Procedures Continued

7.6 Waste Handling

- 7.6.1 If unsure of waste disposal requirements, ask.
- 7.6.2 Remove waste material from spill site only with consent of supervisor.
- 7.6.3 Documentation is required for removal of waste by the Person-in-Charge of the spill (oil, fuel or chemicals are not domestic waste).
- 7.6.4 If using barrels for storage of waste ensure barrels are empty and bungs are in.
- 7.6.5 Clearly mark the barrel or container of what residue or waste is inside.
- 7.6.6 Once spilled material is cleaned up they will be incinerated, if safe to do so, or disposed of at an approved waste facility. (Km 90 Nuisance Grounds)

7.7 Large Spills

- 7.7.1 A command and control center may be needed.
- 7.7.2 Temporary access roads may be needed.
- 7.7.3 Establish Zones may be needed. (i.e.: Hot Zone downwind first)

7.8 Liquid Spill

- 7.8.1 Minor Leak 100ft (30m)
- 7.8.2 Small Leak 400ft (125m)
- 7.8.3 Large Leak 1,200ft (375m)
- 7.8.3.1 Record names and functions of all personnel on site.
- 7.8.3.2 Establish an evacuation area.
- 7.8.3.3 Implement a safety indoctrination procedure for spill site.
- 7.8.3.4 Establish a communication system.
- 7.8.3.5 Set up 24 hour supervision of site.



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7 Spill Response Procedures Continued

- 7.9 Note: For Fuel or hydraulic spills the threshold limit is 100 liters.
- 7.9.1 When reporting a spill of 100 liters or more, the person reporting the spill shall provide the following:
- 7.9.1.1 Date and time of spill.
- 7.9.1.2 Direction spill is moving (or if it has stopped).
- 7.9.1.3 Name and phone number of persons close to the location of the spill.
- 7.9.1.4 Type of containment spilled and quantity spilled.
- 7.9.1.5 Cause of spill.
- 7.9.1.6 Whether the spill is continuing or has stopped.
- 7.9.1.7 Description of the existing containment.
- 7.9.1.8 Actions taken to recover, clean-up and dispose of spilled containment.
- 7.9.1.9 Name, address and phone number of person reporting the spill.
- 7.9.1.10 Name of the person in charge of management or control at the time of the spill.
- 7.10 Spill Kits will be available and carried in equipment and vehicles, which will contain sorbent material, a disposable container, safety gloves and goggles, and a shovel.
- 7.11 Extra spill kits and materials will be available to contain larger spills and be stored at camp and storage locations Sorbent material to be carried in vehicles and equipment.
- 7.12 Vehicles and equipment 10 pads and 2 socks.
- 7.13 Fuel and service trucks 200 pads and 12 socks.

8 Emergency Contact List

Name or Agency	Phone Number
Connie Holguin	(682) 404-7711



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9 Recommended Spill Response Actions

- 9.1 In the event of a spill or release of the waste in other than the disposal facility, the driver and crew will take the following actions: [Note: Adapt the following information to your needs based upon your operations and the type of waste(s) hauled.]
- 9.1.1 Render first aid, if necessary.
- 9.1.2 Make emergency notifications using the emergency telephone contact list (below).
- 9.1.3 Quickly gather and safeguard all SDSs, waste profiles and special waste manifests.
- 9.1.4 Make initial assessments regarding spill. Has waste spilled into or near a watercourse or drainage? Has the waste created a traffic hazard? Are there immediate dangers to human health, such as inhalation of asbestos or toxic ash due to windy conditions or likelihood of fire due to fuel leakage?
- 9.1.5 Place emergency triangles, flags or flares, as appropriate.
- 9.1.6 Evacuate upwind if necessary. Otherwise proceed...
- 9.1.7 If the weather is inclement, use the tarping or plastic sheeting and/or the absorbent material from the clean up kit to prevent run-off or fugitive emissions.
- 9.1.8 If spill is minor, don necessary PPE and use clean up kit items to sweep and/or shovel spilled waste back into truck or into the spare bag or container kept in the clean up kit. If the spilled waste is sludge or infectious waste (or otherwise requires disinfection due to pathogens), decontaminate the ground and equipment with the bleach and water solution. If the spill involves asbestos waste, use water mister to lightly wet and consider using the tarp or plastic sheeting. Be sure to place all used PPE into a plastic bag for disposal or cleaning.
- 9.1.9 If the spill is major and can not be safely or effectively cleaned up by the driver and/or crew using the spill kit, contact (682) 404-7711.
- 9.1.10 Document the date, time of incident, persons on scene, summary of clean up actions taken, departure time, and any other information deemed relevant on the company's incident report form.

10 Emergency Telephone List

- 10.1 Fire/Police Response: 911
- 10.2 "Your Company's" Dispatch/Emergency Notification Number: (682) 404-7711
- 10.3 Other numbers, such as hospitals, large-spill environmental contractors, etc.



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11 Clean Up Kit Contents

- 11.1 The following items will be kept with the truck and readily available to the drivers and/or crew during the transportation of solid waste:
- 11.1.1 Broom
- 11.1.2 Shovel
- 11.1.3 Large tarp (you describe...)
- 11.1.4 Absorbents (you describe...)
- 11.1.5 1 or 2 gallon spray container with water (will be 10% bleach and water solution when transporting WWTP sludge)
- 11.1.6 5 heavy-duty plastic bags
- 11.1.7 Generic labels (with self-adhesive)
- 11.1.8 5 extra special waste manifests
- 11.1.9 1 roll of duct tape
- 11.1.10 5 incident report forms (attach a copy)
- 11.1.11 PPE (coveralls, Tyvex suit, Tyvex or rubber booties, latex gloves, leather work gloves, eye protection, steel-toe boots, dust mask/respirator, other PPE as appropriate)

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12 Additional Safety-Related Items

- 12.1 The following safety-related items will be kept with the truck and will be readily available to the drivers and/or crew during the transportation of solid waste:
- 12.1.1 Communications equipment (cellular telephone, two-way radio)
- 12.1.2 Flares, triangles, cones
- 12.1.3 First aid kit
- 12.1.4 Fire extinguisher

Printed Name

Signature

Date



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CHAPTER 36

1 Stop Work Authority Program

- 1.1 This program establishes the Stop Work Authority (SWA) of all employees and contractors to suspend individual tasks or group operations when the control of Health, Safety or Environmental (HSE) risk is not clearly recognized or understood and/or equipment service is compromised.
- 1.2 It is the policy of JDM Janitorial Inc. that:
- 1.2.1 All employees have the authority and responsibility to stop any task or operation where concerns or questions regarding the control of HSE exist.
- 1.2.2 No work will resume until all stop work issues and concerns have been effectively addressed and the designated individual with restart authority determines that the imminent risk does not exist or no longer exists.
- 1.2.3 Any form of retribution or intimidation directed at any team member or company for exercising their authority as outlined in this program will not be tolerated.
- 1.3 This "stop work" program applies to all JDM Janitorial Inc. projects and operations.
- 1.4 JDM Janitorial Inc. has developed the following policy on Stop Work Authority (SWA) to ensure the safety of our employees and to comply with health safety and environmental regulations set out by the clients JDM Janitorial Inc. works for.

2 Implementation

- 2.1 Training: Safety meeting, Awareness training.
- 2.2 PPE: Safety vests, hard hats, work boots, work gloves, eye & ear.

3 Competent Person

3.1 Connie Holguin is the competent person responsible for the program.

4 Training

- 4.1 Employees will be trained on Stop Work Authority and the contents of this program prior to beginning work and on an ongoing basis.
- 4.2 The training will be documented to include:
- 4.2.1 The employee name,
- 4.2.2 The dates of training and subject.



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5 Key Roles and Responsibilities

- 5.1 Senior management creates a culture that promotes SWA and supports use of SWA without potential for retribution, supervisors and managers honor SWA requests and resolve before resuming operations, HSE provides training, support, documentation and monitors compliance of SWA program, employees and contractors initiate stop work and support stop work initiated by others.
- 5.2 Operations managers have a responsibility to accept and support all "stop work" intervention from employees. Management will resolve issues resulting from a team member's "stop work" concerns and ensure no actions are taken as retribution against team member(s) who raise safety concerns to stop an activity they believe is unsafe. This action of "stop work" will also include any evidence of potential equipment service interruption due to unsafe or undocumented processes (methods of procedure) when performing equipment installations or maintenance.
- 5.3 Employees have a responsibility and are authorized to "stop work" on any activity or situation they believe danger or a risk is present to them or a coworker without fear of retribution from management. The "stop work" may include discussion with other employees or management or Safety Coordinator to resolve work related issues, address potential unsafe conditions, and/or clarify work instructions, etc.
- 5.4 The Safety Coordinator is responsible for monitoring compliance with the requirements of this program, the maintenance of associated documents, processes, training materials, identification of trends, and sharing of lessons learned.

6 Stop Work Authority Procedure

- 6.1 Employees who identify a potentially unsafe condition or act which could result in an undesirable event, a "stop work" intervention must be immediately initiated for the individual(s) and/or equipment potentially at risk. All potential unsafe condition or acts must be documented on a Job Safety Analysis Card (JSA/STAC) card. The card must be completed daily at the beginning of every job to identify all potential unsafe condition or issues.
- 6.2 The team member who identified the "stop work" incident will notify all affected employees and their Operations Manager of the stop work issue.
- 6.3 All employees will discuss and gain agreement on the "stop work" issue.
- 6.4 Resolve any issues that have resulted in the "stop work". The issue resolution or corrective action must be discussed with all employees, including manager, and be in place before return to work.
- 6.5 If employees cannot provide a resolution to the "stop work", then work will be suspended until a resolution can be achieved. The operation manager must make the final determination on the corrective action and provide the go-ahead to continue.
- 6.6 All corrective actions on job "stop work" incidence when finalized must be documented. The team member(s) must use the Incident Reporting form for this process.



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6.7 All Stop Work Authority occurrences should be documented to evaluate effectiveness of the program and identify areas for improvement.

7 Reporting

- 7.1 All "stop work" concerns must be documented as a "near miss" report. Employees must use the Incident Reporting policy form for reporting purposes. The report must be reviewed by the management and front line supervisors in order to:
- 7.1.1 Identify the "stop work" incident,
- 7.1.2 Notify and report to affected employees and Operations Manager,
- 7.1.3 Provide corrective action to job stoppage,
- 7.1.4 Resume work after issues has been resolved and cleared to proceed
- 7.1.5 Facilitate lessons learned with employees.
- 7.2 The Safety Coordinator will publish incident details regarding the "stop work" action to the Operations Manager and all employees outlining the issue, corrective action, and lessons learned.
- 7.3 No retribution will follow a stop work action initiated in good faith even if it is deemed unnecessary.

8 Follow-Up

- 8.1 Management will review all "stop work" reports within one week in order to identify any additional investigation or follow-up required.
- 8.2 The report will be used as part of "lessons learned". Operation Managers will provide the root cause analysis to the "stop work" action and identify any potential opportunities for improvement, encourage team member's participation, and share lessons learned.
- 8.3 It is the desired outcome of any Stop Work Intervention that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work. Most issues can be adequately resolved in a timely manner at the job site, occasionally additional investigation and corrective actions may be required to identify and address root causes.



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9 Employee Acknowledgement

- 9.1 I have read and understand the Stop Work Authority policy and understand that I have the authority and obligation to Stop Work.
- 9.1.1 Employee Name:_____
- 9.1.2 Signature:_____
- 9.1.3 Date:_____

10 Stop Work Authority Several Step Process

- 10.1 Stop when an employee perceives conditions or behaviors that pose imminent danger, he or she must immediately initiate a stop work intervention.
- 10.2 Notify notify affected personnel and supervision of the stop work action.
- 10.3 Investigate affected personnel will discuss the situation and come to an agreement on the stop work action.
- 10.4 Correct Corrective actions will be made according to the corrections agreed upon in the investigation.
- 10.5 Resume All affected employees will be notified of what corrective actions were implemented and work will recommence by personnel with restart authority.
- 10.6 Follow Up A root cause analysis to the stop work will be completed to identify any potential opportunities for improvement.



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