

R Connolly & Co, Inc

Safety Program 6-7-18

Safety Professional: Robert Connolly

Purpose Statement

R Connolly & CO understands there is a strong, documented link between active safety and health programs and low rates of occupational injuries and illnesses. Companies with effective safety and health programs have significantly lower injury and illness rates than those that do not. A comprehensive safety and health program helps to organize all of the hazard-specific safety and health programs we are required to have, including:

OSHA 10	
OSHA 30	

Federal OSHA strongly recommends that employers have a general safety program, and we want each employee to know our company guidelines for workplace safety, which is why a corporate decision has been made to develop this general safety program.

Roles and Responsibilities

Everyone is responsible for making the safety program work. Everyone at R Connolly & Co should be able to explain his or her role in creating and maintaining a safer and healthier workplace.

For All Employees at R Connolly & CO

Everyone must follow safety rules at all times. When employees are in other departments, they must follow all safety and health rules for that department.

An employee's first priority is to perform each job task safely. If an employee is unsure how to perform the task safely, he or she must consult with their supervisor.

Employees must wear personal protective equipment (PPE) as required for their protection and maintain the PPE in a sanitary manner.

Employees must promptly report any safety and health hazards they observe to their supervisor or a Safety Committee representative provided in the table below.

Safety Committee Representatives	
Name	Telephone #
Robert Connolly	207-233-8651
Christopher Wright	207-210-8053

R Connolly & Co employees must report all accidents, including near misses, to their supervisor immediately. Supervisors must review all accident investigation reports with the Safety Committee and take appropriate action to prevent recurrence.

R Connolly & Co will initiate, in cooperation with first-line supervision, all safety training required by regulation or identified by management, supervision, or the Safety Committee as needed to assure a safe workplace.

The person in charge of safety at your facility will recommend improvements to mitigate any hazards or environmental concerns to management, supervision and the Safety Committee.

For R Connolly & CO supervisors

Supervisors must discuss any current safety issues with their employees at the beginning of all regularly scheduled staff meetings, tool box talks or pre-shift meetings.

Supervisors will address all safety concerns raised by staff, determine if the concern is valid, and take appropriate corrective action whenever necessary. Corrective action can include ordering new equipment, issuing maintenance work orders, or consulting with the Safety Committee or upper management.

Immediately upon learning of an accident, the supervisor must file a First Report of Injury Form (FROI) with the person in charge of safety or your company designee (FROI form available from person in charge of safety). Additionally, the supervisor must initiate an accident investigation and submit the completed accident investigation report to a representative of the Safety Committee or their supervisor.

Supervisors will actively and positively participate in all Safety Committee inspections of their assigned areas.

For R Connolly & CO management

Managers will communicate to all employees and supervisors the importance of worker safety and health throughout the organization.

Management shall review all safety concerns brought forward by the Safety Committee and take appropriate action.

Management shall review this program and any recommended revisions from the Safety Committee at least annually, make appropriate revisions and work with the Safety Committee, and the Safety Committee will communicate revisions throughout the organization.

Management will provide the Safety Committee with the authority to identify and correct hazards, the budget to purchase new equipment or make repairs, the training necessary to work safely and to recognize hazards, and the systems to get repairs made, materials ordered and other improvements accomplished.

Management will demonstrate the importance of this safety program by the example they set in initiating safety and health improvements, correcting hazards, enforcing safety rules, rewarding excellent performance in safety and health, and by following all safety rules.

Hazard identification, analysis and control

Methods

One method used to identify hazards includes walk around inspections. Checklists can serve as a good starting point to assist in identifying workplace hazards and can be customized to specific needs or areas of concern.

Regardless of the method used, R Connolly & CO will combine expert opinion about safety and health hazards with input from either a cross-disciplinary team or at least one employee who works directly with the process or equipment in question. Hazard identification will be done annually to identify both newly developed hazards and those previously missed.

R Connolly & CO will also conduct industrial hygiene monitoring and/or sampling for agents such as but not limited to hazardous substances, harmful physical agents or noise. Owner's manuals and manufacturer guidelines detailing the safe operation, care and maintenance of equipment and machines will also be used for hazard identification.

Additionally will have insurance carriers and/or contracted safety & health professionals conduct walk around inspections to identify hazards, conduct industrial hygiene monitoring and recommend corrective action as needed.

One of the tools used to identify hazards is the use of NAME OF SAFETY PROFESSIONAL, the safety pro.

New equipment/processes

Initial hazard assessments will be performed prior to the introduction of new materials, equipment or processes to the workplace, or before major changes are made to processes, equipment or the work environment. These assessments will be performed by the Safety Committee. This is to assure employees will be protected from potential safety and health hazards from the beginning.

Reporting hazards

All employees are trained on how to report workplace safety and health hazards and to expect that the problems will be evaluated and corrected if a hazard exists. In order to do that, R Connolly & CO has developed a reporting system using personal notification to supervisor for action. Employees reporting a hazard will be updated about the status of their complaint by their supervisor.

R Connolly & CO expects employees to correct hazards such as housekeeping issues. For example: moving clutter stacked in front of a fire extinguisher or exit door, removing a tripping hazard, or wiping up a non-chemical spill.

It is not acceptable for employees to conduct repair or maintenance they are not trained to do, that would require locking out a power source, could expose an employee to electrical shock, repairing a machine guard, using tools or equipment not normally used for the employee's job including power tools, non-power tools and ladders, or placing any part of the employee's body in the moving part of a machine for any amount of time.

Abating or fixing hazards

After hazards are identified, they will be managed per the standard safety engineering hierarchy for controlling hazards, as follows:

1. **Engineer** the hazard out. These engineering controls could include machine guarding, guardrails, ventilation, or raw material substitution as examples. All engineering controls will be exhausted before other measures are taken.
2. **Work practice controls.** This is a technique for employee protection and involves modifying tasks and jobs to reduce employee exposure to hazards. This could include using water to keep airborne dust levels down or keeping lids on solvent containers.
3. **Administrative Controls.** An example of an administrative control may be to use job rotation (perhaps for a repetitive job) or using a tool (push stick, for example) to reduce employee exposure to a hazard. Another administrative control could be to develop a work rule that employees would be trained on and then the rule would be strictly enforced.
4. **Personal Protective Equipment.** This should only be used as a last resort, after all feasible engineering controls and work practices have been implemented. Examples of personal

protective equipment would be items such as: respirators, gloves, safety glasses, hearing protection, etc.

Employee input about abatement techniques will be sought. Employees are able to provide insight regarding equipment and work procedures or have their own ideas about how to abate hazards. Employees are often familiar with the history of the process and what measures might have been tried in the past.

Regular preventative maintenance of equipment is also important to prevent hazards. If there is equipment within the facility(s) that requires regularly scheduled maintenance or integrity checks, per manufacturer's guidelines, such maintenance may be performed by external contractors. Proper housekeeping methods are also used to reduce health hazards by reducing, for example, airborne dust levels. Housekeeping is the responsibility of all employees.

Communication and Training

A written safety and health program is just words on paper if employees are not aware of it. Employees cannot follow safety rules, identify hazards, use correct work procedures or protective equipment, or work to achieve safety goals if they do not have the necessary knowledge to do so.

If employees are afraid to discuss safety and health concerns with management or have no clear method of reporting their concerns to management, safety and health hazards can go undetected. Uncorrected hazards can adversely affect employee morale and productivity. With that in mind, requires employees to read this safety policy as part of our safety training program so they are aware of how the company addresses worker safety and has a plan on preventing injury, identifying hazards, enforcing safety rules, and training employees on how to do their work safely.

R Connolly & CO employees will receive training on this program and a verbal review of the content of this program:

1. With each new employee, prior to them beginning work.
2. Whenever management notices deficiencies in work practices.
3. Whenever the contents of this program change.

Hazard specific or position specific safety training

In addition to this safety program, employees will receive safety training that is specific to particular hazards or specific to safety rules for a position. Some of these programs require annual training according to state and federal regulations. Those subjects requiring *annual* training are the following: N/A



Other than annual safety subjects requiring training

On-site Safety and Health Consultation provided by SafetyWorks 1-877-723-3345	

Emergency action plan

R Connolly & CO designates and trains employees to assist in a safe and orderly evacuation of other employees in the case of emergency. R Connolly & CO will review the emergency action plan with each employee when the plan is developed, at hire, when the employee's responsibilities under the plan change; or when the plan is changed.

Accident investigation

Accident investigation is a key component of a safety and health program. The goal of accident investigation is to identify and prevent hazards. Accident investigations will be a team effort including supervision and at least one member familiar with the processes or equipment involved in the incident. Any contractors involved will also be represented on the team. For these situations, there is an accident investigation form.

Three cause levels will be investigated including the following:

1. **Direct Causes.** These are the immediate causes of the injury, illness or damage. An example could be hazardous materials or energy (e.g., electrical, potential energy or heat) that caused the injury or damage.
2. **Indirect Causes.** These are unsafe acts and conditions that caused hazardous material or energy, for example, to exceed safe limits.
3. **Basic Causes.** Causes that contribute to the creation of the indirect hazards. These can include poor management policies, personal factors or environmental factors.

Enforcement of safety program

Responsibility for safety and health exists at all levels here at R Connolly & CO. Safety rules will be enforced. Supervisors and the Safety Committee will monitor employees to assure engineering controls (guards etc.) and personal protective equipment are correctly used and procedures correctly followed.

Safety program review

R Connolly & CO will review this safety program annually. The following items should be reviewed on an annual basis:

1. Review company safety goals for the year, and determine if they were met. If they were not met, determine why.
2. Set new goals for the coming year. This program and our other safety and health programs should be updated to correct shortfalls, and to reflect the real procedures used in the organization.
3. Whether the procedures used in the facility are consistent with those described in this program and if they are effective. For example, if there are injuries and illnesses occurring from hazards that are not identified or controlled through the methods described in our safety programs, we need to determine if the methods used in our occupational environments are correct and as described in our written programs and training materials. If the methods are not being used or being used incorrectly, we need to determine what barriers are present that prevent the correct application of methods.

4. Review of injury and illness log (OSHA 300 log) will be examined for trends, such as similar injuries to employees with similar job duties, similar causes of injuries and illnesses or departments with higher than average injury rates. Accident investigation reports should also be reviewed.

Safety Committee

In accordance with best practices for occupational safety, R Connolly CO has a joint labor-management Safety Committee. Safety Committee members can perform their duties without fear of discrimination or retaliation by management. The requirements for the committee, in addition to the duties outlined earlier in this program, are to:

1. Hold regularly scheduled meetings and keep documented minutes of the meetings.
2. Have the employees of this company select their Safety Committee members.

Current Safety Committee members are:

1. **Robert Connolly**
2. Christopher Wright
3. Justin York