

Union County Government
Employee Safety Guidelines

&

OSHA Compliance Reference Manual

Revised May 2009

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A MESSAGE FROM THE COUNTY MANAGER

Dear Employees:

The Employee Safety Guidelines and OSHA Compliance Reference Manual is written to promote a positive attitude toward maintaining a safe working environment for all employees. It serves as a guide for the daily completion of our job tasks and ensures that work is being carried out in consideration of sound general safety and health practices. It will not address all situations one might encounter in the workplace, so we must remain ever conscious of our work surroundings.

Because of the diversity of county government services, some departments are required to develop specific safety and health programs with procedures that address their unique needs.

This manual is a guide to raise safety and health awareness within Union County Government.

Employees committed to putting all our safety resource into daily practice are the key element of an effective safety and health program. As Manager of Union County, I ask that you join me in making a personal commitment to safety and health in order to help fulfill our goal of maintaining a safe and healthy working environment for all county employees.

I encourage each of you to contact our Risk Manager whenever you need assistance in developing safety programs to meet OSHA compliance requirements or assistance in any aspect of workplace safety.

My warmest personal regards.

Sincerely,

PURPOSE

Union County's Safety Guidelines and OSHA Compliance Reference Manual is a general reference for all Department Heads, Supervisors and employees regarding protection from hazards that can result in work related injuries and illnesses. It is intended to inform and educate employees in the prevention of accidents resulting in efficient utilization of taxpayers dollars to provide services to members of our communities. A successful safety program must not only provide for the safety of employees but also offer protection of the visiting public by preventing unsafe acts or conditions within Union County facilities.

The following pages contain only highlights of the Safety and Health Regulations for general industry under North Carolina's Occupational Safety and Health Act (OSHA) and other regulatory groups. It is not intended as a complete manual on safety and health, but should be used as a reference guide for the identification of common hazards found in Union County Government operations. Failure to include all OSHA safety and health standards does not give license to ignore such standards.

For a specific standard applicable to your department or job task, contact your Department Safety and Health administrator or the Union County Risk Manager.

SCOPE

In addition to the departments under the authority of the Union County Board of County Commissioners, these guidelines apply to the Union County Property Appraiser, Tax Administrator and Tax Collector, Board of Elections and Registrar of Deeds.

For reference purposes only, The Union County Sheriff's Office may also benefit from referring to the OSHA Compliance Reference Sections.

AUTHORITY

The Division of Occupational Safety and Health administers and enforces the 1973 Occupational Safety and Health Act of North Carolina, a broadly inclusive law which applies to most private sector employment in the State and to all agencies of state and local government. In addition to enforcing state OSHA safety and health standards, the North Carolina program offers free services to the 180,000 private and public employers under its jurisdiction through its Consultative Services Bureau, and educational and engineering assistance through its Education, Training, and Technical Assistance Bureau. By making full use of these non-enforcement services, employers may bring their establishments into full compliance with OSHA standards. Employers may contact the bureaus to receive free aid, including technical assistance or on-site visits. The North Carolina Occupational Safety and Health standards parallel the federal OSHA standards. The North Carolina standards may be more strict than the federal standards, but they may not be less strict. Serious violations of OSHA standards can result in monetary fines; dates by which the violations must be abated accompany the citations.

OSHA SAFETY AWARDS PROGRAM

The North Carolina Department of Labor safety awards program recognizes private and public firms throughout North Carolina which achieve and maintain good safety records. The program is designed to stimulate interest in accident prevention and to promote safety in the workplace by providing an incentive to employers and employees to maintain a safe and healthful workplace

ASSISTANCE FROM OSHA

Community College Safety and Health Workshops

The workshops are sponsored by:

The North Carolina Department of Labor & The Small Business Center Network of the North Carolina Community College System

The North Carolina Department of Labor and the Small Business Center Network of the North Carolina Community College System both know how difficult it can be for employers in our state to comply with the many regulations imposed on businesses. They also know that safe workplaces help reduce the cost of doing business. Because of these things, the Departments have teamed up to offer workshops to help develop good safety and health programs and comply with OSHA requirements.

The local workshops are designed to either help businesses get "up to speed" or "fine tune" existing safety and health programs. Employers, managers and employees are encouraged to attend. Those who attend will learn the basics of compliance, how to start the safety process, and how to assess their businesses' continuing requirements.

Both General Industry and Construction 10-hour workshops are offered, as well as 90 minute sessions on a variety of safety and health topics. These workshops/sessions are offered through the Small Business Centers at the NC Community Colleges across the state. All classes are filled on a first come, first served basis. In most cases there is no charge for this training. However, the community college may charge a nominal fee to cover registration costs.

Assistance From OSHA

Understanding OSHA and the Inspection Process	OSHA Posting and Record keeping Requirements
Forklift Safety	Hazard Communication: Worker Right-To-Know & Hazardous Chemicals Right-To-Know Act: Community Right-To-Know
Common Electrical Hazards	Lock Out/Tag Out
Fall Protection for General Industry (Slips, Trips and Falls)	Machine Guarding
Bloodborne Pathogens	Tuberculosis

Hearing Conservation	Respiratory Protection
Personal Protective Equipment (PPE)	Confined Space
Safety and Health Programs and Committees	OSHA Training Requirements for General Industry
Hazardous Waste Operations and Emergency Response (HAZWOPER)	Electrical Hazards In Construction
Fall Protection in Construction	Excavation and Trenching Safety
Scaffolding	Other OSH topics by request

For information about the scheduled classes or to request a specific topic, please contact the Director of the Small Business Center at the Community College in your area.

For general information, please contact the North Carolina Department of Labor Education, Training and Technical Assistance Bureau at

4 West Edenton Street
Raleigh, NC 27601-1092
phone: 919-807-2896
fax: (919) 807-2876

EMPLOYEE COMPLAINT PROCEDURE

A complaint procedure is established to ensure open communication between all levels of employment to foster a safe and healthful workplace. There shall be neither reprisals nor sanctions taken against any employee for bringing management's attention to a safety and health problem. If after registering a complaint or concern with your supervisor, you feel the need to process the complaint further, contact your Department Director, Director of Personnel or the County Risk Manager.

APPLICATION OF SAFETY GUIDELINES

Each employee shall carefully review those safety guidelines applying to their department's operations and their assigned duties.

If an employee is assigned a task, which the employee considers hazardous and for which he/she feels they are not properly trained or protected, the employee shall inform the supervisor before commencing work.

Due to the wide diversity of County operations, as well as the variations in departmental organizational structures, it is fully realized that certain terminology and specific procedures for all situations may not be contained in this manual.

Department Heads, therefore, are required to formulate and implement safety and health programs and procedures specific to their operations. The guidelines set forth in this manual are

the minimum requirements that apply to most employees within Union County Government.

Risk Management has the responsibility, tools and resources to assist you in developing and implementing specific Department safety and health programs and procedures.

When a hazard or violation has been identified, whether through self-inspection; completion of Risk Management surveys; a consultant's visit; or state and local official visits, it is the Department's responsibility to correct the condition and provide a response to Risk Management.

Risk Management will assist you in finding the acceptable method of eliminating or controlling the hazard in accordance with approved OSHA regulations.

RESPONSIBILITIES

The following responsibilities are "minimum requirements." They are not intended to limit an individual's effort in implementing more comprehensive procedures for reducing injuries.

COUNTY MANAGER

The Union County Board of County Commissioners through the office of County Manager exercises overall responsibility for funding and supporting the provisions of the Safety and Health Program. The Union County Risk Manager is charged with the responsibility of administering of the Safety and Health Program by providing Departments the support necessary for successful implementation.

DEPARTMENT HEADS

Department Heads are directly responsible under OSHA regulations for the safety and health of employees. They also have a responsibility to protect the visiting public from injury and for the stewardship of all Union County property and equipment within their department's authority and control.

Department Heads will ensure that:

1. A Department Emergency Evacuation Plan is prepared, in writing, and reviewed with each employee for each location in the event of fire or other emergency. The Plan shall include the following elements: Evacuation procedures and routes; Employee head count following an emergency evacuation; Means of reporting emergencies;
2. All personnel under his/her control have been advised of the guidelines and procedures contained within this Manual and any specific safety requirements of their departments.
3. The department's specific safety policies and procedures provide for the utmost protection possible from the hazards encountered by the employees of their department.
4. Safety and loss prevention efforts are actively supported and promoted.
5. Ensure that all required personal protective equipment/clothing is budgeted for, procured, issued to and utilized by the employees performing job assignments, as required by OSHA.

6. Periodically evaluate the effectiveness of the safety and loss prevention program, implementing corrective actions and improvements whenever appropriate.
7. Ensure that supervisors are held accountable for their safety and loss prevention responsibilities.
8. Risk Management, Department of Labor Division of Occupational Safety and Health, and other safety representatives receive full cooperation regarding safety inquiries of the department.

SUPERVISORS

Supervisors will ensure:

1. They are familiar with OSHA Safety and Health regulations related to their area of responsibility.
2. A copy of applicable safety programs and OSHA forms are maintained on site. For example, the Hazard Communication Program.
3. They support safety efforts through personal example, interviews with employees, regular safety meetings, display of safety compliance posters, signs and when applicable, exhibits on safety bulletin boards, etc.
4. They conduct regular health and safety inspections of work area and direct correction of unsafe conditions.
5. They conduct a Job Hazard Analysis for each task under their control on an annual basis and every employee performing a hazardous task is aware of the hazards and thoroughly trained before proceeding. .
6. All employees are trained in the use and need for protective equipment required for specific tasks.
7. Adequate protective clothing and equipment are available for personnel requiring such items and the use of equipment is enforced
8. All hazardous tasks are covered by specific written work procedures in order to minimize injury and property damage potential.
9. Employees working hazardous operations are instructed to report promptly all malfunctions of equipment, absence of safety devices, improper procedures, request training if in doubt..
10. Safety equipment is available, maintained, used, and stored correctly.
11. That adequate First Aid equipment is available for minor injuries and it is well maintained.
12. They arrange for prompt medical attention in case of serious injury to include transportation, communication, and emergency telephone numbers; and a person with valid certified first aid training is available if required.
13. They investigate all accidents/incidents with the employees involved. Ensure that corrective action is taken immediately to eliminate the cause of the accident. Submit written report to the Risk Manager within 48 hours.
14. They include an employee's safety record in the criteria used to measure each employee's annual performance.
15. They are firm and impartial in taking disciplinary action against those who fail to follow safety rules and be prompt in giving recognition to those who perform well.
16. They require all subcontractors and subcontractor personnel to comply with safety and health regulations while under your supervision and control.
17. Risk Management Department is called upon for assistance to promote more aggressive and

effective loss control measures, when necessary.

ALL EMPLOYEES

Employees are required, as a condition of employment:

1. To understand and follow all instructions related to the safety and health of the task to which you are assigned.

IF AN EMPLOYEE FEELS THAT AN UNSAFE CONDITION EXISTS IN THE WORKPLACE, THE EMPLOYEE SHOULD STOP AND GET INSTRUCTIONS FROM THE SUPERVISOR BEFORE CONTINUING WORK.

2. To wear all required personal protective equipment as assigned including, but not limited to, seat belts, gloves, safety shoes, goggles, hard-hats, respirators, and hearing protection whenever conditions make this equipment necessary.

FAILURE TO WEAR AND/OR USE REQUIRED PERSONAL PROTECTIVE EQUIPMENT MAY RESULT IN A REDUCTION OF WORKERS' COMPENSATION BENEFITS IN THE EVENT OF AN INJURY.

3. To promptly report to his/her supervisor all unsafe equipment, unsafe tools and/or hazardous conditions which may affect county employees, the work area or the general public.

4. Keep work areas clean and orderly at all times.

5. Report all accidents no matter how minor immediately to the supervisor or their designee.

6. Avoid distracting fellow employee(s) and in engaging in activities that may cause inattention and result in an accident or injury.

7. Refrain from the use of any substance that may affect job performance. Know the County's policy on drug and alcohol free workplace. Report the use of any prescription or over the counter medication that may affect job safety to supervisors.

FAILURE OF ANY EMPLOYEE TO FOLLOW THE AFOREMENTIONED MAY RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION, IN ACCORDANCE WITH THE UNION COUNTY PERSONNEL POLICY.

RISK MANAGER

Risk Management shall make every effort to:

1. Review the County's and the Department's safety and health program on an annual basis.

2. Provides all levels of management the services and technical advice needed for proper administration of the Safety and Health Program.

3. Develop programs and technical guidance to identify and remove physical, chemical, and biological hazards from facilities, operations, and sites.

4. Formulates, recommends and administers approved changes to the accident prevention program.

5. Assists management and supervisors in the safety and health training of employees.

6. Conducts inspections to identify unhealthy or unsafe conditions or work practices. Prepares

written reports of inspections.

7. Monitor all fire and safety inspections conducted by insurance companies, State and local authorities.
8. Maintains outside professional contacts. Incorporate into the Safety Program current practices and philosophies adopted by safety professionals concerning prevention of injuries and occupational diseases, vehicle accidents, public liabilities, and damage to buildings, equipment, material and revenue.
9. Recommends programs and activities that will develop and maintain incentives for and motivation of employees in health and safety.
10. Maintains the OSHA 300 Log and Summary, and ensures this information is posted in places where employees can see them on each job.
11. Develops and maintains accident and incident investigation and reporting procedures and systems.
12. Report occupational fatalities and serious injuries to OSHA within 12 hours of occurrence.:
13. Conduct an aggressive loss prevention program.
14. Maintain an effective defensive driver-training program for County drivers.
15. Investigate all accidents resulting in injury or property damage and offer recommendations to prevent recurrences.
16. Maintain records on all vehicle accidents for quarterly review with the County Manager.
17. Actively participate with community safety professionals and citizen's groups striving to promote accident prevention.
18. Coordinate and administer the Worker's Compensation program.
19. Assist Department Supervisors perform and evaluate Job Hazard Analysis' annually.
20. Assist departments in the development and annual evaluation of OSHA standards.
21. Assist Departments in responding to OSHA safety/health citations.
22. Monitor compliance and coordinate all responses forwarded to the NC Division of Occupational Safety and Health Office.
23. Review and recommend provisions for compliance with Federal and State standards in plans and specifications for new construction, repairs, or modifications to county properties.
24. Periodically attend Department safety meetings to promote maximum understanding of the program objectives.

PURCHASING

To ensure that materials or equipment purchased by County employees are in conformance with NC Department of Labor, Division of Occupational Safety and Health, and Union County requirements, the following procedures should be followed:

1. Purchase orders, purchase contracts, or requests for bids shall contain the following statement:

"The (Service, Articles) covered by this (Purchase Order, Contract, or Request for Bid) must equal or exceed State of North Carolina safety requirements and regulations."

2. A request to Purchasing and Contracts for orders of hazardous chemicals or hazardous materials will have the following statement:

“On or before the first shipment of a hazardous chemical or material an MSDS will be sent to the Purchasing Department for review.” All original MSDs shall be sent to the respective department for filing in the MSDS book.

3. Risk Management Department should be contacted whenever there is doubt as to whether a contemplated purchase, design, or work order conforms to State safety regulations and requirements.

4. Whenever possible, anyone with responsibility for equipment purchases should use safety and ergonomics as criteria in the selection of new equipment or the upgrading of old equipment.

EMERGENCY NUMBERS

Emergency 911 or 9-911 for Fire, Ambulance, Law Enforcement

Risk Manager: Keith A. Richards, CPCU, ARM, AIC
500 N. Main Street #130
Monroe, NC 28112
704.283,3663 (office)
704.292.2590 (Fax)
704.634.7567 (Cell)

Authorized Worker’s Compensation Medical Providers:

8:00 am-5: 00 p.m. Carolina Occ Med
3016 Old Charlotte Highway
Monroe, NC 28110
704.282.2400

Other Times CMC-Union
Emergency Room

Workers Compensation Claim Administrator:

Key Risk Management Services
P.O. Box 49129
Greensboro, NC 27419
800.366.1511

HAZARD IDENTIFICATION, ASSESSMENT, AND CONTROL

Hazard identification and elimination is not only an inherent responsibility of supervision in providing a safe workplace for employees, but also requires employee involvement. As such,

hazard evaluation and control shall be an ongoing concern for all. It is the responsibility of everyone (management, supervisors and all employees) to identify, report, and correct, all possible hazards. Reports should be made to the Department Director, Supervisor or Risk Manager for appropriate action and follow up.

EMERGENCY EVACUATION PLAN

Obtain and know your department's specific Emergency Evacuation Plan for your workplace for fire, chemical release, severe weather, bomb threat, etc.

The following general rules and actions should be learned before an emergency and followed in the event of an emergency.

Before an Emergency:

1. Obtain your department's Emergency Evacuation Plan from your supervisor.
2. Learn how to contact emergency services.
3. Locate local fire alarms or other emergency alarm systems and learn how to operate them.
4. Learn the location of all exits, (exit stairs) from your work area, and determine a primary and alternate exit route.
5. Know your designated meeting area outside the building for your accountability and that of your co-workers.

When an Emergency Occurs:

1. Immediately respond by following department plans for the appropriate emergency response.
2. Follow your department plan for the assistance of persons with disabilities.
3. If a fire alarm sounds, always immediately evacuate the building.
4. Do not run. Do not use elevators. Use stairwells in multi-story buildings.
5. Report to your designated meeting area outside the building immediately.
6. If you have a visitor, escort them to your designated meeting area.
7. Do not re-enter the building after an emergency evacuation until you have been instructed to do so by management.

OSHA STANDARDS

STANDARDS COMPLIANCE

It is Department Heads responsibility to comply with all applicable federal, state, county, and local standards and ordinances.

RECORDKEEPING AND REPORTING INJURIES

OSHA 29 CFR Part 1910.1904 requires the recording and posting of employee injuries on prescribed forms. Posting of the Summary of Injuries and Illnesses shall be from February 1 until March 1 for incidents from the prior calendar year. This summary is available for review at the Courthouse, Personnel Department located on the eighth floor. Copies are available for each location upon request from Risk Manager.

JOB HAZARD ANALYSIS

1. It is the responsibility of the department supervisor to annually perform a written Job Hazard Analysis to identify hazards and to determine the proper engineering controls, safety equipment and Personal Protective Equipment required to minimize the risks of hazardous job tasks.

2. Procedures for a Job Hazard Analysis/Risk Assessment are as follows:

3. List the sequence of job steps the job is broken down into basic steps, describing what is to be done in a logical sequence.

4. Search for and list potential hazards of each step that may cause an injury. The objective is to identify as many hazards as possible.

Decide on a recommended action or procedure to protect the employee from the hazards. When the risks and potential hazards associated with each step are identified and their causes understood then methods of eliminating them should be outlined.

There are four basic methods by which this can be accomplished:

Substitution - Eliminate the hazardous process or operation and provide a substitute action.

Isolation - Isolate the process or operation to eliminate or minimize the hazard.

Protection - Provide appropriate engineering controls to minimize or eliminate hazards.

Personal Protection- Provide and enforce use of personal protective equipment to reduce the possibility of injury or illness.

The information collected from all of the above steps is used to create specific department safety policies and procedures. The policies and procedures assist supervisors in instructing employees how to perform their job safely.

FIRST AID

First aid is the immediate emergency treatment provided for injury or sudden illness before professional medical care is available.

Never minimize the seriousness of an injury or illness. If in doubt seek medical attention.

In the event of an emergency, immediately call for emergency services.

DO NOT ATTEMPT TO RENDER FIRST AID UNLESS YOU KNOW WHAT YOU ARE DOING OTHER WISE INJURIES MAY BE AGGRAVATED.

First Aid Kits should be available for treatment of minor cuts and scratches.

First Aid Kits:

1. Departments shall determine the contents of first aid kits based upon the department's operations and professional medical advice when appropriate.
2. Departments should dispense only medicines, etc. that are medically necessary for administering first aid.
3. The availability of first aid kits is not a substitute for obtaining medical treatment. Routine administration of first aid for other than minor cuts and scratches must be performed by "certified" (by the American Red Cross of NC Office of Emergency Medical Services) or licensed medical personnel.
4. The first aid provider to protect against infectious disease must use universal precautions. (See Bloodborne Pathogens Standard)

HAZARD COMMUNICATION STANDARD (RIGHT-TO-KNOW)

OSHA 29 CFR Part 1910.1200 Hazard Communication (Right-to-Know)

If employees are exposed to or work with hazardous chemicals at the job site, this program is required. Important elements of the program are written program required to include a master listing of chemicals; maintaining material safety data sheets on each chemical; and training of employees on the program, the chemicals exposed to, and material safety data sheets.

Definition of Hazardous Chemicals

As identified in the Hazard Communication Standard, chemicals with one or more of the following hazardous properties are subject to the Standard:

Physical Hazards: combustible, flammable, explosive, reactive, pressurized (compressed gases).

Health Hazards: toxic, carcinogenic, corrosive, irritant, or sensitizer.

Labels and Other Forms of Warning

Chemical manufacturers, importers, or distributors are required to ensure that each container for hazardous chemicals is labeled with the identity of the hazardous chemical(s), appropriate hazardous warnings, and the name and address of the chemical manufacturer, importer or other responsible party.

County departments are to ensure that chemicals they receive are labeled with the identity of the hazardous chemical(s) and appropriate hazard warnings.

A current inventory of all hazardous chemicals present in the workplace is to be maintained. The inventory should be kept with the Material Safety Data Sheet (MSDS) file.

Material Safety Data Sheets (MSDS)

Chemical manufacturers are required to send a Material Safety Data Sheet (MSDS) with the initial shipment of a chemical. The MSDS contains detailed information about physical and chemical properties of the chemical, the physical and health hazards, safe-handling precautions, and spill clean-up procedures, emergency and first aid procedures.

County departments are to maintain all MSDS received and make them readily available to their employees in a file or notebook. If an MSDS for a chemical is not received the chemical manufacturer or distributor should be contacted to obtain the MSDS.

Refer to your department's copy of the Union County written Hazard Communication Program for program specifics.

BLOODBORNE PATHOGENS STANDARD

OSHA 29 CFR Part 1910.1030- Occupational Exposure to Bloodborne Pathogens Standard requires employers to determine who has occupational exposure and to establish methods to reduce workplace exposure to bloodborne pathogens.

Employees who have occupational exposure to human blood, body fluids, pathogens, or body parts are required to receive training in work practices, methods of exposure and universal precautions.

To comply with the standard each department with this exposure must develop and maintain an Exposure Control Plan. The information in the Exposure Control Plan will help to ensure limited occupational exposure to blood and other potentially infectious materials.

The employer must make the Hepatitis B vaccination series available, at no cost to all employees who may have occupational exposure.

The most important element is strict adherence to the specified practices and procedures and use of personal protective equipment (PPE).

Employees shall:

Observe Universal Precautions set forth by the CDC (Center of Disease Control) to prevent contact with blood or any other potentially infectious materials.

Refer to your department's Exposure Control Plan for additional information.

LAB SAFETY

OSHA 29 CFR Part 1910.1450 requires employers to provide a safe workplace in various types of laboratories.

Laboratory means a facility where "laboratory use of hazardous chemicals" occurs. It is a workplace where relatively small quantities of hazardous chemicals are used in a non-production

basis.

All laboratory workers are required to attend training that describes the OSHA Laboratory Standard, Hazardous Material Handling and Waste Disposal Regulations, where to find chemical safety information, emergency procedures, and required Laboratory Safety Plans.

Where hazardous chemicals defined by the standard are used in the workplace, each department shall develop and carry out the provisions of a written Chemical Hygiene Plan.

Refer to your departments written Lab Safety Plan for program specifics.

ELECTRICAL LOCKOUT - TAGOUT - CONTROL OF HAZARDOUS ENERGY

OSHA 29 CFR Part 1910.147, the Control of Hazardous Energy (Lockout/Tagout) standard covers the servicing and maintenance of machines and equipment for which the unexpected energization or start-up could cause injury to employees.

According to the OSHA Standard, an energy source is any electrical, mechanical, hydraulic, pneumatic, chemical, thermal, or other energy.

The lockout/tagout rule requires the employer to establish a written Energy Control Program. Refer to your Department's Energy Control Program for specifics.

CONFINED SPACE STANDARD

OSHA 29 CFR 1910 is the Confined Space Standard.

If employees enter a confined space that contains or has the potential to contain a atmospheric or physical hazard, this program is required.. Primary elements of the program are identification of applicable confined spaces, testing/ monitoring, control or elimination of hazards, protective equipment, entry authorization, attendants, training, and rescue.

Union County Departments will ensure that all potential confined spaces within county facility(s) are evaluated.

Union County Departments will review and evaluate this standard practice instruction on an annual basis, or when changes occur to 29 CFR 1910.146, requiring prompt revision of this document, or when facility operational changes occur that require a revision of this document.

Departments will establish confined space operational procedures through the use of the Confined Space Written Document.

Definition of Confined Space

After facility evaluation, spaces that meet the following criteria will be designated as a confined space:

- It is large enough and so configured that an employee can enter and perform assigned work.
- Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.)
- Is not designed for continuous employee occupancy.
- Contains or has a potential to contain a hazardous atmosphere.
- Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller crosssection.

RESPIRATORS STANDARD

OSHA 29 CFR Part 1910.134 Respiratory Protection Standard

If employees are exposed to hazardous/toxic chemical, paint or other gases, vapors, fumes, dusts, or mists above the permissible exposure limit, and/or respirators are worn by employees, this program is required. Program elements are written program for the selection, maintenance, care, and use of respirators, fit testing, training, and employee evaluation for use.

Respiratory Medical Program:

Employees shall not be assigned tasks requiring use of respirators unless it has been determined that they are physically able to perform the work and use the equipment. The employee may be required to have a physical at a County designated facility to determine if the employee is able to wear a respirator.

Respirators shall be worn when working with chemicals or products that pose health hazards when inhaled or ingested in the form of dusts, vapors or mists. Each affected department shall have a written Respiratory Protection Program.

Requirements for a minimal acceptable program are specified in OSHA 1910.134 (b)(1). Contact Risk Management for assistance in compliance.

PERSONAL PROTECTIVE EQUIPMENT (PPE) STANDARD

OSHA 1910.132 requires employers to provide and employees to use and maintain Personal Protective Equipment for eyes, head, and extremities, protective clothing, respiratory devices and protective shields and barriers wherever its is necessary by reason of hazards capable of causing injury. Your department may have specific requirements; therefore, contact your supervisor to determine the equipment needed to perform your job safely.

Your supervisor's annual Job Hazard Analysis will be used to identify required Personal Protective Equipment.

Head Protection- is required to protect employee's head where there is a danger of head injury from impact and falling or flying objects. Class A hard hats are required for construction and

general industry where there is no exposure to electrical shock or burns. Class B hard hats are required when additional protection is required to protect the head against high voltage electricity. Reference ANSI-Z-89.1-1986.

Ear Protection - shall be used as required to protect employees from noise when engineering controls cannot reduce noise to acceptable levels.

Eye and Face Protection - as required for the hazard exposure (which shall be identified by your supervisor) shall be used as required to protect employee from eye and face hazards such as, optical radiation, glare, chemical splash, flying fragments, objects, large chips, particles, sand, dirt, etc.

Respiratory Protective Equipment - must be used as part of a comprehensive respirator program when required to protect employees from airborne contaminants which, when measured, are above the Threshold Limit Value in OSHA Standards.

Foot Protection (safety shoes) - is required to protect employees working in areas where there is a danger of foot injuries due to falling or rolling objects piercing the sole or where protection is needed against electrical or chemical hazards. Protective footwear shall comply with ANSI-Z-41-1991 "American National Standard for Personal Protection - Protective Footwear."

Hand Protection - as required by established standards to protect employees from physical, biological, chemical, radiation, or electrical hazards. Gloves used for electrical protection must be marked as to class of equipment and whether or not they are ozone-resistant and shall meet the ASTM D-120-87.

Fall Protection - (safety harness, lifelines and lanyards). Is required to protect employees from falling while working at heights of six (6) feet or more not protected by standard guardrails or safety nets or as required when working in confined spaces.

TRENCHING AND EXCAVATIONS STANDARD

29CFR 1926, Subpart P) Excavation work shall follow Occupational Safety and Health Standards and Department of Transportation regulations.

SAFETY AND LOSS CONTROL

Purpose

In general, safety and loss control programs are instituted to identify, analyze, and eliminate hazards which may result in personal injury to employees, public liability, or loss or damage to property and equipment.

Workplace Injuries and Illnesses

If you have an accident or if you are injured on the job you should immediately notify your

supervisor.

If your injury requires medical treatment, follow the county procedures regarding medical treatment. With reference to occupational disease, an employee must give notice to the employer when the employee is first informed by a competent medical authority of the nature and work related causes of the illness.

If you have questions about coverage or benefits under workers' Compensation you should contact the Risk Manager who administers the Workers Compensation program at 704-283-3663.

Reporting Unsafe Conditions

All Union County employees shall keep alert for unsafe conditions. If an unsafe condition is identified, it is to be reported to a supervisor. The supervisor shall evaluate the risk of personal injury, public liability, and damage to property or equipment, and initiate steps for correction of the unsafe condition.

If a supervisor is not available and the problem is not corrected in a timely manner, the employee shall follow departmental chain of command to make sure that appropriate management personnel are informed of the problem. Any employee may call the Risk Manager to report the unsafe condition if adequate and timely corrective action has not been taken.

Elimination of Unsafe Conditions

One of the most effective means of preventing accidents is the elimination of unsafe conditions (engineering controls).

The important factor in eliminating unsafe conditions is doing so before an accident or incident occurs. Near miss occurrences need to be investigated and corrected, as they are a warning of a condition that may eventually lead to an accident. A near miss occurrence is an example of an incident resulting in neither an injury nor property damage. However, a near miss occurrence has the potential to inflict injury or property damage if its cause is not corrected. Educating and training the workforce in the proper use of equipment and materials, awareness of their surroundings and understanding their role in safety will aid in eliminating these occurrences.

Job Safety Training

No one should assume a newly hired, newly assigned, or reassigned employee knows all the required safe job procedures. They must receive continuous training.

Supervisors shall ensure all employees under their control are competently trained and capable of carrying out assigned tasks in a safe manner.

Training and education cannot be overemphasized as a means of learning a healthful and safe approach to employee work effort.

Knowledge of the safety rules and how and when to function under the rules, supplemented by compliance, is essential to safety.

Employees scheduled for any safety and health training will attend such training.

New employees will be provided orientation training and will be furnished information and literature covering the county safety and policies, rules, and procedures. This orientation training must be provided prior to the employee's exposure to the work environment.

Individual job/task training, to include the applicable regulations/standards for their job, will be provided to all employees. Included in this training is: the recognition, avoidance, and prevention of unsafe conditions, areas and activities that require personal protection equipment, and how to use protective equipment (such as respirators, etc.).

{Monthly/quarterly} ongoing safety training sessions will be conducted to provide information and training on new equipment, new procedures, new chemicals, refresher/remedial training in specific areas, or meet annual requirements. Such training may be held in conjunction with the safety briefings/meetings addressed elsewhere in this program.

Various individual Workers' Safety programs specify that training be provided to employees. Supervisors will ensure their employees are scheduled and provided this training as required.

Examples include fire extinguisher training, confined space entry, respirator care and use, hazard communication, lockout/tagout procedures, industrial truck/forklift operation, and electrical work, to name a few. The Risk Manager can assist you in making this determination.

Supervisors should review their employee's training requirements and include training time frames or schedules in planning their work. Training outlines/guidelines should also be developed to ensure all areas/items are covered in this training.

Training records must be maintained by Departments in a master log indicating the name of the employee trained, date of training and an outline of the training topic covered.

SAFETY INSPECTIONS

Every employee is responsible for maintaining a safe working environment and reporting unsafe conditions to their supervisor.

Self-inspections of work areas and detailed inspections of equipment and review of employee operating procedures should be performed by the supervisor on a regular basis.

The objectives of a safety inspection program are to:

1. Maintain a safe work environment through awareness training, hazard recognition and hazard control or elimination.
2. Ensure that employees are following proper safety procedures while working.
3. Determine which operations meet or fail to meet acceptable safety standards.
4. Inspections should be documented and all unsafe conditions, procedures, and practices

corrected.

5. Inspection reports will identify the hazard and specify the length of time to correct violations or hazards. Corrective action will be the responsibility of the Department Director.

In addition to self-inspections, the County Risk Manager, the commercial insurance loss control specialists, local fire department and the Department of Labor (OSHA) may inspect Union County operational activities.

Inspection reports shall be responded to in writing detailing corrective measures to be implemented and date of correction.

All supervisors and employees are required to cooperate with these inspection representatives.

Copy of responses should be sent to Risk Management.

Departments should contact Risk Management for assistance at any time, especially when OSHA Compliance Officers visit in order to receive assistance in responding and avoiding further enforcement action.

FUNDAMENTALS OF ACCIDENT / INCIDENT PREVENTION

Accidents/incidents Are Preventable

Many people believe that accidents are the inevitable result of unchangeable circumstances, fate, or a matter of bad luck.

It must be emphasized that accidents do not happen without cause, and the identification, isolation and control of these causes are the underlying principles of all accident/incident loss prevention techniques.

To better understand the circumstances that give rise to the causes of accidents and incidents, it is helpful to consider the sources (potential, existing and a combination of sources).

The sources can be reduced to four major elements. Briefly they are:

1. People - What someone does or fails to do.
2. Equipment - Safeguarding, maintenance and operator training.
3. Material - Hot objects, toxic substances, heavy objects, irregular shaped and sharp objects and materials.
4. Environmental - Lighting, noise, atmospheric conditions and the safety culture.

Two basic causes of accidents and incidents are:

- | | |
|---------------------|---|
| 1. Personal factors | Lack of knowledge, training or skill.
Improper motivation, physical or mental problems. |
| 2. Job factors | Inadequate work standards, inadequate design or maintenance, normal wear and tear and abnormal usage. |

Control of Accident/incident

There are three main methods utilized to control accident/incident causes. They are engineering, education and training, and enforcement. These three methods, sometimes referred to as the "three E's" of safety, are outlined below:

1. Engineering Causes of accidents, or unsafe conditions, can sometimes be eliminated through the application of engineering controls. Design of machine guards, automobile brakes, traffic signals, pressure relief valves, and handrails are examples of safety engineering at work.
2. Education and Training Safety education is an effective tool in the prevention of human accident causes. Through adequate instruction, personnel gain useful knowledge and develop safe attitudes.
3. Enforcement Accidents can often be prevented through adequate safety engineering and education. Enforcement must be immediate with positive and negative reinforcements effectively distributed through a standard operating procedure.

GENERAL SAFETY GUIDELINES

The following general safety guidelines apply to all personnel. These guidelines do not prohibit departments and supervisors from promulgating more stringent or specific rules and regulations relevant to their particular operation. Each and every employee has an obligation to perform his/her duties in a safe and efficient manner and to report any and all unsafe acts or situations to his/her supervisor immediately. In addition to these general safety rules, all state, local and federal rules and regulations apply.

Office Safety

All employees shall observe the following guidelines:

1. Good housekeeping practices shall be observed and practiced in every office.
2. If you observe spilled liquids or objects on the floor, arrange for cleanup or pick up immediately to prevent a slip or fall.
3. All defective equipment or furniture should be immediately reported to a supervisor and removed from the space.
4. An open desk drawer or cabinet is a hazard. Keep drawers and cabinet doors closed.
5. Chairs should be used for sitting only. Do not lean back to the extent that the front legs are lifted off the floor.
6. Do not climb up on chairs or use chairs as a stepladder.
7. In a four-drawer filing cabinet open only one drawer at a time. When possible, load heavy items in the lower drawers. Always fill a cabinet from the lower drawers to the upper drawers to maintain the lowest possible center of gravity in the cabinet.
8. Electrical, telephone, and other cords, furniture, and equipment shall be located out of the passageways and walkways where they would create a tripping hazard or impair egress during an emergency.

9. Extension cords are for temporary power. Use only approved strip type extension cords. If power is needed for a longer period of time, request an electrical outlet be installed in the area.
10. Check that electric wires and plugs are in good condition, with no frayed or worn areas.
11. Electrical equipment with a ground prong requires a three-prong receptacle. Do not remove the ground prong on three prong plugs.
12. Check that floor surfaces are in good condition. Report slippery areas, weak subflooring, torn carpets, or other damaged floor surfaces.

Falls

Falls can be prevented.

1. Always use handrails when using stairs.
2. Use caution when walking on surfaces that contain; ice, snow, rock, oil, water or other adverse or unstable material or condition.
3. Immediately clean up spills.
4. Prevent fall hazards by keeping stairs, walkways, isles and walk areas clear of boxes, loose materials wires and other objects.
5. Select shoes for comfort and safety that are compatible with your work environment
6. Do not stand or climb on a desk, chair, or other unstable surface to for and object. Use a Ladder.

Motor Vehicles

Refer to the County Vehicle Use Policy and/or Request Defensive Driver Training from Risk Management.

Electrical Safety

1. Follow required lockout/tagout procedures, as necessary when working on electrical devices or wiring.
2. Hand tools, electrical cords and outlets will be inspected periodically to check for reversed polarity, grounding terminals and devices.
3. Ground fault circuit interrupter (GFCI) will be used where there are water operations that could pose a potential hazard.
4. Only authorized and qualified persons shall make repairs to or work on electrical equipment.
5. All electrical equipment shall be grounded or double insulated.
6. Know where and how to shut down the electrical power in the event of an emergency.

Ergonomics

The Federal OSHA Standards requiring written plans for identifying and controlling Cumulative Trauma Disorders has not been adopted at this time. North Carolina has also not adopted this standard, however, awareness, control and prevention of CTDs falls under the **General Duty Clause** of the OSHA standards and thus should be considered in evaluating workplace safety.

Ergonomics is the study of human work. It identifies the physical and mental capabilities and limitations of a worker as they interact with tools, equipment, their workstation and their working environment.

Ergonomic principles should be practiced in order to minimize the risk of developing any work related Cumulative Trauma Disorders (CTDs). CTDs can occur in any working environment. They are the result of repetitive movements and unnatural positions of the body. The body should maintain a natural or neutral position at all times.

An evaluation of the work area or work methods can be conducted and should:

1. Identify tasks that require the body to move or stay stationary in unnatural positions and those that require repetitive motions.
 2. Analyze the tasks and determine if modifications can be made.
 3. If possible, modify the way the tasks are performed.
 4. Modifications of the workstation or work practice are made to relieve the body of strain and stress. Costly and extensive modifications may not always be necessary.
- Contact Risk Manager if you are concerned about the EGONONMIC Effect of any particular task for an evaluation of the hazard.

FIRE PREVENTION

One of the most costly and destructive causes for loss of life and property that the County could experience would be from a major fire. All facilities or parts thereof used by County employees shall have a current written Emergency Evacuation Plan that will provide for the safe evacuation of all persons in the event of an emergency of any kind.

This Plan should be put into action, evaluated and updated as necessary or at least annually. You have a personal responsibility in the prevention of fires. Familiarize yourself with the location of fire equipment in the area where you work and the proper method of turning in a fire alarm. If you are trained and able to use portable fire protection equipment (such as fire extinguishers), you can be of assistance in controlling most fires.

Reporting Fires

All employees should report fires immediately to 911 and follow the procedures outlined in your Emergency Evacuation Plan. Note that from many office buildings it is required to dial "9" to get an outside line. Therefore, you may have to dial 9-911.

Note: Know the location of the exits and the location and correct operation of the nearest fire extinguisher.

Portable Fire Extinguishers

All portable fire extinguishers shall be inspected by Facilities each month with the inspection date and inspector's initials recorded on the extinguisher's inspection log.

Access to fire extinguishers must be kept clear at all times.

A fire extinguisher shall be used only on a small fire.

Most portable fire extinguishers are classified:

"A" for fires involving combustibles like wood or paper

"B" for flammable liquids

"C" for electrical wiring and equipment

"ABC" for combination fires

Signs should be visible indicating the location of fire extinguishers.

Have the used fire extinguishers replaced or recharged as soon as possible after each use. Extinguishers are to be placed in accordance with the hazard associated with the workplace.

Obey all rules, regulations and signs for fire safety such as those controlling smoking, open flames and other sources of ignition and those controlling the storage, handling and use of flammable liquids or other hazardous materials.

Practice good housekeeping and fire prevention.

Flammable liquids shall be handled and stored in approved safety containers equipped with flame arrestors and spring actuated caps.

Do not store acids and bases or oxidizers and reducers in the same cabinet due to the possibility of extremely violent reaction between the two.

Automatic Sprinklers

Materials shall not be piled within eighteen (18) inches of sprinkler heads.

There shall not be any storage above the sprinkler protection. Do not store materials above the suspended ceiling.

Sprinkler heads must be in good condition, with no accumulation of dirt, dust or grease and free from paint.

Fire/smoke Alarm Systems

All fire/smoke alarms must be operable and in good condition, protected from physical damage, maintained and tested bimonthly. In the event an alarm sounds, employees shall follow the Emergency Evacuation Plan to immediately evacuate the building.

Fire Doors

A fire door is a special door designed to contain the spread of fire and smoke within a building. Some models of fire doors will operate automatically in case of a fire. Do not prop open self-closing fire doors. Keep self-closing fire doors closed, but not locked. Check that nothing blocks or will prevent full closure of a fire door. Also check that nothing will prevent operating the fire door.

Egress

Doors, stairs, passages and aisles will be maintained free of obstructions, hoses, tools and materials. There must be full access to those areas in case of fire or other emergencies. Exit signs must be visible from all areas or there must be signs indicating the direction to an exit.

Signs

In general, signs must be free of burrs, splinters or sharp projections and signs will be placed so that the sign itself does not constitute a hazard. Danger signs indicate immediate danger and that special precautions are necessary. Caution signs warn against potential hazards or unsafe practices. Safety signs are used for instructive purposes.

Tags

Tags are used to provide messages and act as a means of preventing accidental injury or illness. Tags are not to be construed as a complete warning method but should be used only until a positive means can be employed to eliminate the hazard.

Danger tags are used where the hazard presents a threat of death or serious injury.

Caution tags should be used where a non-immediate or potential hazard or unsafe practice presents a lesser threat of injury.

Warning tags are used where the hazard is between serious and potential.

Biological tags identify substances, equipment or parts that are contaminated with hazardous biological agents.

Color Codes

The safety color code for the identification of hazards can be broken down to the following:

Red	Fire protection
	Danger
	Emergency stop buttons or electrical switches
	Emergency equipment

Orange	Basic color for designating dangerous parts of machinery or energized equipment which can cut, crush, shock or otherwise injure.
Yellow	Caution For marking physical hazards such as striking against, stumbling, tripping, falling and caught-in-between.
Green	Basic color for designating safety and the location of first aid equipment, safety eye wash stations and bottles, safety deluge showers
Black/White	For the designation of traffic and housekeeping markings.

ENVIRONMENTAL SAFETY

Indoor Air Quality

Indoor air contaminants can originate within the building or be drawn in from outdoors. If contaminant sources are not controlled, indoor air quality problems can arise, even if the heating, ventilation and air conditioning system is properly designed and well maintained.

Union County strives to design and maintain its facilities in such a way that a safe and healthy environment is provided for its employees.

The Personnel/Risk Management Department shall be advised as soon as possible before leasing, buying, or renovating activities result in an occupancy change to ensure an assessment of indoor air quality requirements has been made.

Asbestos

Asbestos is the generic name for a group of minerals that occur naturally in the soil like gold, iron, etc. It has a wide variety of uses in different industries, but it is also known to be a health hazard when small, sharp fibers become airborne and inhaled. Some diseases may not appear until 20 to 40 years after exposure. Some asbestos-related diseases are asbestosis, mesothelioma and lung cancer.

Under Section 112 of the Clean Air Act, the Environmental Protection Department (EPA) established National Emissions Standards for Hazardous Air Pollutants (NESHAP) to protect the public. On March 31, 1971 the EPA identified asbestos as a hazardous pollutant, and on April 6, 1973, EPA first promulgated the Asbestos NESHAP in 40 CFR Part 61. This was revised in 1990 and amended.

The Personnel/Risk Management Department should be notified in advance of scheduled demolition or renovation activities.

Personnel/Risk Management Department shall be contacted before purchasing or leasing real estate to arrange an insurance and safety inspection.

Annual re-inspections are conducted to assess the condition of the asbestos containing materials Friable category I and II asbestos shall be removed by a certified asbestos contractor and an asbestos consultant prior to demolition or renovation activities. Non friable ACM that becomes friable during the project, and contaminated waste and material that cannot be decontaminated, should be treated as Regulated Asbestos Containing Materials (RACM) by keeping it wet and disposed of in a landfill that operates in accordance with 40 CFR Part 61.150 and Part 61.154 or Part 61.155.

COUNTY SAFETY COMMITTEE

Background

The Union County Manager, in an effort to ensure safe and healthful working conditions for employees and to support and enhance the Employee Safety Program, has authorized the establishment of the Union County Employee Safety Committee.

Purpose

To establish a Safety Committee for County employees.

Objectives

The objectives of the Union County Safety Committee are to:

1. Develop and recommend for adoption new or improved safety programs and procedures for County employees and employees participating in the Union County Insured and Self-Insured Programs.
2. Identify and evaluate unsafe acts or conditions and generate suggestions and recommendations to improve the workplace safety.
3. Influence employees to work safely by setting a good example and encouraging coworkers to adopt safe work habits so that fewer employees are injured.

Organization

The Union County Safety Committee will consist of:

- Internal Auditor
- The Risk Manager
- Three employee members from Operations

In the event a member cannot attend a Union County Safety Committee meeting, a replacement shall be assigned to attend.

Appointed employees shall serve 12-month terms commencing on July 1 of each year.

Employees are eligible for consideration for multiple consecutive terms.

In the event a member is absent for three consecutive scheduled meetings, without reasonable explanation, the member's Department Director shall be asked to make a replacement appointment.

Duties and Responsibilities

The Committee's role is to support the Risk Manager in evaluating the effectiveness of the Department's Safety and Health Programs and to recommend programs, policies and procedures that support long and short term safety goals of Union County. It will monitor the activities of the Department's Safety Programs to achieve Union County's overall safety objectives.

The Committee will initiate appropriate steps to implement solutions or make recommendations to the County Manager in those cases where there is either a need for new or revised Department safety policy and to recommend that funds required to enact changes are identified in the budget. The Risk Manager will plan, schedule and conduct meetings at least quarterly. Meetings may be scheduled more frequently at the will of the County Manager. One week prior to the meeting, the Risk manager will develop and distribute an agenda to all Committee members.

The Risk Manager will preside at the meetings and encourage open communication. Meeting topics may include any subject relevant to promoting employee and facility safety including, but not limited to, promotion of new or revised safety training programs, safety incentive programs; and review of new or existing safety-related legislation, safety equipment, and review of accident or incident records to identify safety concerns.

The Committee will prepare and submit reports as necessary to issue its recommendations. Recommendations will be transmitted to the Department Director, Risk Management Department for general safety issues, County Manager for Countywide administrative items to include policy and funding issues.

DEPARTMENT SAFETY COMMITTEE

All Departments will organize and establish Safety teams and will meet at least quarterly to discuss safety subjects.

The subjects will include, but are not limited to:

1. Methods of promoting department safety awareness.
2. Identifying employee safety concerns.
3. Schedule employee safety training, including requests for Risk Management assistance in facilitating the training.
4. Increase interdepartmental knowledge of the various safety issues that different departments must address.
5. Review injury/illness cases to determine corrective and preventive action.
6. Establish procedures for investigating workplace accidents/ illnesses.

7. Develop and evaluate accident prevention programs.

The Risk Manager will attend at least two departmental safety meetings per year, acting as technical advisor. He/she may assist as necessary in conducting any employee safety meeting as requested..

SELF INSPECTION CHECKLIST

This listing includes items and categories for health and safety inspections of the workplace. It is generic and not all inclusive, but provides a guideline to be developed into a checklist for use during the self inspection.

- a. First aid safety and health equipment.
- b. Posters, signs required by North Carolina Occupational Safety and Health.
- c. Accident reporting forms
- d. Employee training provided, such as safety talks, worker orientation.
- e. Equipment and tools: condition, use.
- f. Protective guards and devices availability, use, proper maintenance and operating condition.
- g. Housekeeping, maintaining clean work areas free of trash/debris accumulation, tripping and slipping hazards.
- h. Lighting: for adequacy and safety.
- i. Sanitation: water, toilets for cleanliness and proper operation.
- j. Noise hazards, hearing protection.
- k. Ventilation for gases, vapors, fumes, dusts.
- l. Availability of personal protective equipment: Hard hats/head protection, respirators, safety belts, life lines, safety shoes, eye protection, gloves.
- m. Fire protection, prevention and control, use of fire protection equipment.
- n. Temporary buildings, trailers, sheds.
- o. Open yard storage.
- p. Storage of flammable and combustible liquids including service and refueling areas for vehicles.
- q. Temporary heating devices.
- r. Tools (hand, power, welding): condition and use.
- s. Electrical system and devices; condition and use of cords; ground fault protection or assured grounding conductor protection.
- t. Openings floor, wall, railings.
- u. Materials handling equipment and elevators.
- v. Ladders: condition and use.
- w. Hazard communication program and material safety data sheets (MSDS).
- x. Excavations and trenches: protective systems.
- y. Other items as appropriate.