



PARAGON SYSTEMS INC.

# SAFETY MANUAL



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# Introduction

Nothing in the manual is confidential. Employees should have access to the manual to help improve their safety performance.

Since a single program cannot be written to encompass all of the responsibilities of our personnel at every site, this manual is written to assist the region, area, district, and client site with developing their own Injury Illness Prevention/Safety Program that is specific to the industries and sites/locations they work within and type of services that they perform.

The Injury and Illness Prevention Plan (IIPP) and Heat Illness Prevention Plan (HIPP) located in the beginning of this manual are the models by which all offices should use in developing their district and site specific programs. This should be completed by all district locations. It provides the essential elements of an effective safety program that can be tailored to each location's specific needs. The completed IIPP and HIPP should also become part of all Post Orders.

We have also developed checklists and suggested formats which can be lifted from the text to provide procedures for each office. We have presented a Corporate philosophy on safety that enables each office to tailor safety procedures to its particular climate, regulatory environment and client needs. We hope this manual is used frequently.

Many insights and suggestions have come from loss control programs conducted at the local office level. Any suggestions to improve and refine this manual are welcome.

# Safety & Health Policy Statement

It is the policy of Paragon to work to provide a safe and healthy workplace for our employees. This policy is of primary concern to the company and one we take very seriously. Our Injury and Illness Prevention Plan (IIPP) is designed to encourage and facilitate the control of safety and health hazards and to pursue the elimination of on-the-job injuries and illnesses.

For this program to be successful, the proper attitude and cooperation of all managers, supervisors, and employees is most important.

It is only through the cooperation and awareness of our objectives, by all our employees, that we can maintain a safety record that will continue to make Paragon a leader in the contract security industry.

It is the responsibility of management to impress upon all those who report to them that safe practices are an integral part of our work. Therefore, supervisory personnel must establish, maintain and monitor safe work practices and provide on-going safety education to prevent and eliminate exposures to risk.

Equally important, all employees have the responsibility to perform their jobs safely, and report to their supervision all risk exposures/safety hazards to reduce the exposure for an accident/injury.

**PEOPLE ARE OUR MOST IMPORTANT ASSET.**

**ALL PARAGON EMPLOYEES ARE RESPONSIBLE FOR WORKING SAFELY  
AND MAINTAINING A SAFE AND HEALTH WORK ENVIRONMENT.**

A handwritten signature in dark ink, appearing to read 'ASL', is written over a solid horizontal line.

**Tony Sabatino**

Chief Operating Officer

# Injury Illness Prevention Program Summary

An Injury Illness Prevention Program, sometimes called a Safety and Health Program, is a proactive process to help employers find and fix workplace hazards before workers are hurt. These programs provide the foundation for changes in the way employers identify and control hazards which lead to a significantly improved workplace health and safety environment.

The key elements common to an Injury Illness Prevention Program are:

- Management Leadership
- Worker Participation
- Hazard Identification and Assessment
- Hazard Prevention and Control
- Education and Training
- Program Evaluation and Improvement

Successful programs include elements that focus on finding all hazards in the workplace and developing a plan for preventing and controlling those hazards. Both active management and active worker participation are essential so that all hazards are identified and addressed. Employee training on the working components and requirements of the program, along with periodic evaluation to determine whether improvements are needed are paramount to achieve this success.

The contents of this Safety Manual are the basis for this program and include many of the regulatory and company requirements. However, when it comes to injury and illness prevention programs every serviced business/client is different, and one size does not fit all. These programs need to be adapted to meet the needs of each individual organization location depending on size, industry sector or complexity of operations. Special consideration needs to be given to on-site hazard evaluation, expected essential roles, responsibilities and core functions of the services that are to be provided, and client site-specific procedures.

Individual Site Injury Illness Prevent Plans, Heat Illness Prevention Plans and Post Orders are fundamental in spelling out which precautions and requirements are needed for employees to perform their jobs in the safest way possible. These along with documented training to enable employees to fully understand the requirements and procedures to be followed minimize the potential for injury or illness in the workplace.

As stated in the Paragon Safety & Health Policy Statement, “Our Injury and Illness Prevention Plan (IIPP) is designed to encourage and facilitate the control of safety and health hazards and to pursue the elimination of on-the-job injuries and illnesses.” The main goal of the program is to prevent workplace injuries, illnesses, deaths and the suffering these events cause our employees.



# Accountability and Responsibilities

This Injury and Illness Prevention Program is administrated by the Director, Safety & Risk Management. Paragon's Chief Operating Officer has the authority and responsibility for implementing and maintaining this Injury and Illness Prevention Program for Paragon.

Management commitment and employee involvement are complementary.

Management commitment provides the motivation force and the resources for organizing and controlling activities within an organization. In an effective program, management regards workers safety and health as a fundamental value of the organization and applies its commitment to safety and health protection with as much vigor as to other organizational purposes. Employee involvement provides the means through which workers develop and/or express their own commitment to safety and health protection for themselves and for their fellow workers.

The responsibility of management and supervision is to implement these procedures. All levels of supervision are held accountable for accident prevention and employees must comply with the company's accident prevention programs and safety regulations.

Supervisors and managers must develop positive attitudes toward safety both in themselves and in their employees. Each office is expected to use safety training checklists so that employees are aware of our emphasis on safety. The "Employee Safety Training Checklist" and "Site Specific Training Checklist" are to be signed by the employee when completed and placed in the employee's personnel file.

Worksite analysis involves a variety of worksite examinations. These examinations are to identify not only existing hazards but also conditions and operation in which changes might occur to create hazards. Effective management actively analyzes the work and worksite, to anticipate and prevent harmful occurrences.

Hazard prevention and controls are triggered by a determination that a hazard or potential hazard exists. Physical inspections are to be conducted at each site upon initial contract agreement and at least annually thereafter using the "Job Hazard Analysis and Periodic Hazard Assessment" form or whenever there is a possibility of changing conditions or scope of work to be performed at a site. Where feasible, hazards are prevented by effective design of the jobsite or job. Where it is not feasible to eliminate them, they are controlled to prevent unsafe and unhealthful exposure. Elimination or controls is accomplished in a timely manner, once a hazard or potential hazard is recognized.

Safety and health training addresses the safety and health responsibilities of all personnel concerned with the site, whether salaried or hourly. It is often most effective when incorporated into another training about performance requirements and job practices. Its complexity depends on the size and complexity of the worksite, and the nature of the hazards and potential hazards at the site.

The Company is committed to the following general safety procedures:

- To provide each employee with a safe workplace.
- To conduct inspections to identify and abate unsafe working conditions in which our employees



may be exposed to; and to control health hazards and comply with state and federal regulations.

- To train employees in good safety practices, hazard identification, emergency procedures, fire safety, safe driving, use of personal protective equipment, first aid and safe operation of equipment.
- To develop and enforce safety and health rules, requiring that employees follow these rules as a condition of employment.
- To investigate every accident with the goal of preventing reoccurrence.

## Regional Presidents

- Are responsible for safety performance in their Region and protecting assets of the company.
- Provide leadership in the safety program by holding Area Vice Presidents and District Managers accountable for safety and by giving support to safety efforts.

## Area Vice Presidents / District Managers

The Area Vice Presidents and District Managers are responsible for ensuring that the Injury and Illness Prevention Program is in place and active for the district location. They must direct the Human Resources Representatives and Field/Site Supervision to ensure the program is in place and active for all client sites in their area of responsibility.

- Must fully support the Injury and Illness Prevention Program with the goal of preventing employee accidents, injuries, illnesses, vehicle accidents, environmental impairments, general liabilities, and property damage.
- Must reduce exposures resulting in losses or potential losses.
- Provide leadership in well-defined safety programs and as members of the Safety Management Committee, review accidents, spot trends, oversee safety training and direct efforts to achieve a safe place to work.
- Issue accident prevention policy statements and approve written safety regulations for the local office and client sites, and ensure enforcement of the company, local and client specific safety policies, procedures, and regulations by all employees. These written safety regulations must be posted in the District Office, and copies should also become part of all post orders.
- Each client must provide Safety Data Sheets, and should provide copies of their safety program, hazard communication program, written safety rules, and emergency/disaster plan, where the district does not write a specific program for the site.
- Enforcement of disciplinary guidelines established in the HEROES manual against those who fail to conform to established safety policies and procedures, and provide for prompt recognition to those who perform well.
- Ensure that the District Offices are in compliance with all applicable safety and health laws, including maintaining the OSHA 300 Log of employee injuries and illnesses and the posting of the OSHA 300A Summary Log records between February 1 and April 30 of each year. And verify that a copy of all District Office 300 Logs are submitted to the Regional Office and are kept on file for the previous five years.
- Ensure all employees have a safe and healthy working environment.
- Review operation and field supervisors regularly for their safety attitude and performance

- Review all “Supervisor Accident Investigation Reports” with the purpose of identifying all causes of incidents and take appropriate action to prevent a similar occurrence.
- Must be aware of all severe work-related injuries and make certain that injured employees are receiving proper care.
- Cooperate with all inspecting agencies and follow up on recommendations in a timely manner.
- Conduct at minimum, an annual site inspection that is documented, and abate hazards through the use of engineering, administrative or personal protective equipment controls.
- Conduct monthly Safety Management Committee meetings as described in the Risk Management Guide.
- Report safety program activities to Regional Management

## **Human Resources/Field Supervisors**

- The Human Resource Representatives and Field Supervision assigned to each of the district locations has the responsibility to ensure that the program is in place and followed by all employees at the various client sites.
- Responsible for training and placement of employees at each client location.
- All employees are to receive general and site-specific safety training, with documentation and acknowledgement part of the personnel file. Completion of the “Employee Safety Training Checklist” and “Site Specific Training Checklist”.
- To participate as active members of Safety Management Committee.
- Review job procedures and suggest improvements.
- Make certain that specific post hazards are clearly stated and explained to employees.
- Transmit completed First Reports of Injury to the insurance carrier within 48 hours from first knowledge of injury.
- Review safety orientation of new employees, to ensure all new employees have reviewed a copy of the safety manual summary, are aware that they have access to the entire safety manual, and are familiar with the safety policies and procedures at their work location.
- Investigate all accidents, injuries and near misses promptly with the purpose of identifying all causes of the incident, and prevention of similar incidents.
- Monitor and oversee coordination of services for all severe medical and lost time claims.
- Establish good relations with the workers’ compensation insurance carriers or adjusting firms.
- Oversee the maintenance of OSHA record keeping: Completion of OSHA Form 300 and Form 301 for all recordable injuries/illnesses. Forms must be maintained for at least five years.
- Establishment and maintenance of a “First-Aid Log” for all non-recordable injuries/illnesses.
- Carry out on-site supervision and safety training in conjunction with post orders.
- Monitor safety records, automobile safety, property and liability claims, and workers’ compensation claims.
- Review Daily Activity Reports (DAR) for identified near misses or noted workplace safety concerns.
- Conduct periodic on-site physical inspections of work areas to ensure employees are following safety rules, procedures, and policies.

## Employees

- Exercise due care in the performance of their duties to prevent an accident or injury to themselves and others.
- Follow all prescribed work policies, procedures and rules.
- Make safety a priority in the work environment.
- Wear proper clothing and equipment.
- Immediately report all accidents, injuries, near misses, and unsafe conditions to their supervisor regardless of how minor it may appear.
- Help investigate accidents, with an aim to helping prevent future reoccurrence to fellow employees.
- Participate in company accident prevention activities such as attending safety management committee meetings and training sessions.

## Safety Management Committee

- Reviewing all hazard reports and communicating safety ideas and recommendations to management.
- Monitoring all resolutions of identified safety problems.

## Safety Enforcement and Disciplinary Program

- Management is responsible for enforcing the safety program and for following the progressive disciplinary actions to be taken whenever employees commit safety violations.
- Safety violations include:
  - » Not following Paragon and/or client written safety procedures
  - » Not following established guidelines or rules
  - » Horse play
  - » Failure to wear or abuse of selected Personal Protective Equipment (PPE)
  - » Substance abuse
- Disciplinary procedures for committing safety violations are as follows:
  - » Verbal counseling/warning is to be given and documented for noted minor safety violations or failure to follow safety procedures and included in the employee's personnel file
  - » Written warning is to be given for noted serious safety violations or if a lack of improvement in following safety procedures has not improved and the progressive discipline is to be included in the employee's personnel file.
  - » Final written and possible suspension is to be given for a very serious noted safety incident or if repeat serious safety violations and lack of improvement in following safety procedures is noted and the progressive discipline is to be included in the employee's personnel file.
  - » Termination can be the result of progressive discipline or without progression of warnings for a very serious safety violation.

# Safety Program Guidelines & Practices (General & Specific)

## Introduction

Employees must have a clear sense of what is expected of them with regard to safety, yet they must also be well aware of management's commitment to them. The only method for achieving this clarity is to provide employees with a set of written safety program guidelines and practices and have them acknowledge in writing that they have read and understood the rules of safe conduct. In addition, employees will be provided with Management's Safety and Health Policy Statement. To show that when we ask employees to be aware and safe, we recognize such a commitment can not only come from employees but must also come from Management.

Because of Paragon's flat management philosophy, and because there is a wide geographical dispersion of offices, a single set of safety guidelines and practices can only be suggested. However, it is the responsibility of the Local and District Offices to formulate, distribute, explain, and review (at least annually) a set of written safety guidelines and practices for their operations and personnel.

**Guidelines for safety** can be found throughout company literature and some offices may already have a set of safety guidelines and practices in place and may also include them in site post orders. Employees must familiarize themselves with the Security Officer Handbook, Site Post Orders, and the Safety Manual.

Other safety rules to follow are:

- All accidents must be reported immediately.
- Security Officers (Officers) must provide their relieving employee any and all post orders pertaining to the post.
- Officers will not permit anyone to relieve them who appears to be under the influence of alcohol, illegal drugs, controlled substance, including marijuana, or who appears to be too ill to work. If this situation occurs, the officer will notify the immediate supervisor and remain on duty until properly relieved.
- Officers will not wear or carry any firearm or other weapon except with special written permission of my Regional President. The officer will comply with State laws before wearing an authorized firearm, and will maintain it in serviceable condition at all times and maintain proficiency in its use in compliance with State and other applicable laws, and company policies. The officer will make sure that the firearm is unloaded and that it and all ammunition is secured per company policy whenever not in use. If lost or stolen, the Officer will follow company procedures with immediate notification to management and local authorities.
- Officers will report unusual incidents occurring on duty to the immediate Supervisor and make a written report no later than the end of the current shift.
- Officers cannot sleep during their work shift.
- Officers cannot drink intoxicating beverages, deal or use illegal drugs or controlled substances, including marijuana, in the workplace, or at any time while in a uniform representing Paragon.
- Officers cannot engage in horseplay or fight while on duty, or at any time while in a uniform representing Paragon.

- Officers will familiarize themselves with the functions and operations of emergency communication systems, police and ambulance services, fire alarms, sprinklers and extinguishing systems, first-aid facilities and use of available firefighting equipment.
- Officers will know how to reach police and fire departments as well as the nearest ambulance service/hospital facility.
- Officers will know how to operate firefighting equipment on their post, including sprinkler systems as per post orders.
- If an Officer is injured while on duty, that Officer should know where first-aid equipment or services are located. All injuries or accidents are to be reported immediately to the supervisor.
- In addition to unusual incidents, Officers will report all unsafe conditions, whether at Paragon or client sites, to their immediate supervisor.
- Officers will report by the end of their shift all incidents or conditions of physical harm or property damage.
- Officers shall report all accidents resulting in injury to self as soon as possible to fellow employees, to clients, or to the customers of clients.
- Officers are not allowed to have radios, television sets or other distracting items at a client's facility.
- Officers must wear, use and maintain proper clothing and personal protective equipment (PPE), including but not limited to: non-slip shoes; head, eye and ear protection; cleats (when provided); flashlights; seat belts; safety harnesses and other equipment as required to perform their duties in a safe manner as per post orders.
- Officers will cooperate in the investigation of accidents, especially those resulting in work related injuries.

At least once a year, written safety program should be reviewed and revised, by the Safety Management Committee, and reviewed with employees.

A copy of the Safety Manual and the Injury Illness Prevention Program will be made available to all employees upon request.

Failure by any employee to adhere to the written safety policies and procedures is subject to disciplinary actions.

## **General Work Safety Practices**

These standards, while general in nature, are designed to apply to all employees while in the performance of their duties for Paragon at all site locations. All Paragon employees assigned to a site location will comply with the following safe work standards:

- Learn and observe the safety rules of Paragon and the site location.
- Wear and use proper personal protective equipment --safety shoes, hard hat, protective goggles, flashlight, whistle, etc., when and where required as per post orders.
- Never lift or try to move/relocate any objects which you feel are too heavy or awkward for you to safely handle by yourself without any strain.

- Do not be afraid to ask for assistance. When lifting, lift with your leg muscles. When pulling or pushing make sure of footing, keep hands and feet clear of materials being moved or relocated, and be aware of pinch points.
- Become familiar with the work area and observe proper precautions when walking through an area or when climbing or descending stairs and ladders, and when walking or working around vehicles or moving objects. Do not multitask, pay full attention to what you are doing and where you are walking at all times. Always use handrails where provided.
- Only operate Paragon or client vehicles or equipment when authorized to do so and only after proper instruction on their safe operation, and successful completion of the Paragon Safe Driving Program.
- Use only the equipment and tools designated by Paragon or the client to perform assigned duties. If equipment or tools become damaged or unsafe, take them out of service, tag them as unsafe, and notify Paragon or the client of the condition. Do not use until either repaired or replaced.
- Be alert to fire hazards and other safety hazards such as spilled oils, chemicals, trash, paints, improper storage, un-permitted cutting, welding or burning, damaged fire protection systems, unsafe electrical hook-ups (e.g. too many plugs per outlet), and bare wires in your work area.
- Do not engage in horseplay or pranks, which will distract others and cause conditions in which accidents or injuries may occur.
- Report all work related injuries or illnesses, no matter how minor, to your supervisor as soon as possible.

## **Specific Safe Work Practices**

### **Chemicals/Hazardous Materials**

- Extreme care shall be exercised by all personnel handling or working with acids, caustics, solvents, petroleum based products and gasses. Please refer to the Hazard Communication / Global Harmonization System Manual located in the Manager's office.
- Materials are considered hazardous if they can harm people or the environment and can be corrosive, flammable, explosive, toxic, or reactive. Hazardous materials could cause immediate or long term health problems if not handled properly.

To prevent hazards, ensure that officers:

- Review the Safety Data Sheet (SDS) for information on: handling, PPE to be worn, using, storing and disposing of materials.
- Read the label of the container for important information.
- Wear appropriate personal protective equipment.
- Where appropriate, employees must wear protective goggles, respiratory equipment, and protective clothing when the inhalation of vapors or hazardous substances or injurious bodily contact with acids or other corrosive materials may occur.
- Officers are to wash out their eyes immediately with large quantities of clean water if chemicals splash into them. Officers must seek immediate medical attention from a doctor or emergency room.



- Containers of injurious chemicals or hazardous substances must be plainly labeled, indicating hazards and precautionary measures for use. Report all unlabeled containers.

***NOTE: CHEMICALS/HAZARDOUS MATERIALS CAN BE HANDLED/USED SAFELY WHEN YOU FOLLOW THE PRESCRIBED PRECAUTIONS TO BE USED ON THE LABEL AND INDICATED IN THE SAFETY DATA SHEET.***

## Electricity

- Only authorized and qualified electricians shall make repairs or work on electrical equipment except for minor work on fixture display installations, etc. while equipment is de-energized.
- Steam, water or oil leaks near electrical equipment shall be reported immediately to the person in charge.
- All portable and fixed electrical equipment must be securely grounded before using. Report equipment that is not securely grounded.
- All electrical wires must be considered live until proven otherwise.
- Do not use any electrical equipment with frayed or otherwise deteriorated insulation.
- The use of make-shift or over-capacity fuses and circuit breaker is prohibited.
- No metal ladders shall be used within six feet (6') of live circuits.
- A clear space of at least three feet (3') shall be maintained in front of all electrical panels and switch gear.
- All electrical cords must be protected from oil, chemicals, and rough surfaces.
- Overloading of electrical outlets and use of multiple adapters and pigtails are prohibited. Electrical circuits must not be overloaded and frayed cords should be replaced.
- Do not activate any equipment that has been Locked Out/Tagged Out (LO/TO) and taken out of service.

## Fire Prevention & Control

- Each year fire takes a terrifying toll in human lives and property damage. We all have the responsibility to help make sure that our workplace has the care and protection necessary to prevent fires.
- Fire needs three congruent things to start: **OXYGEN, FUEL, and an IGNITION SOURCE.** Eliminating and/or reducing any of these will prevent, or reduce the possibility of a fire.
- **Paragon's job in fire prevention is to keep ignition sources that start fires away from things that burn.**
- No open flames or smoking shall be permitted in areas where flammable gases or liquids are stored or used. **"No Smoking", "No Open Flames"** signs shall be posted. Smoking is only allowed in designated areas.
- Flammable liquids shall be stored and properly labeled in approved safety cans.
- Approved fire extinguishers (CO<sub>2</sub>, and dry chemical) shall be provided in all areas where flammable and combustible liquids are filled, stored, dispensed, mixed or handled.
- Care should be exercised in the correct location and selection of a proper type of fire extinguisher. Employees must know the location and proper use of fire extinguishers and hose lines.



- Carbon-dioxide, Halon or Dry-chemical type fire extinguishers should be used on electrical fires.
- Water-type fire extinguishers should be used on combustible material fires, but should never be used to fight electrical fires as the stream may conduct electricity.
- Halon extinguishers are best for use on sensitive electronic equipment, such as computers which would be damaged if gotten wet while fighting a computer fire with water,
- All locations shall ensure periodic inspection and proper care of fire extinguishers. When an extinguisher appears to be in doubtful condition it must be reported to the manager immediately. All fire extinguishers shall be serviced at least once a year and immediately after being used.
- Passageways and work areas around fire-fighting equipment must be kept unobstructed at all times. All fire doors are to remain closed unless equipped with a fusible link.
- All waste materials, other than minor amounts in waste baskets in areas of constant supervision, shall be stored in covered metal or metal-lined receptacles or bins.
- Overloaded electrical circuits and frayed electrical cords can over heat circuits and cause fires.
- If a fire hazard is seen and nothing can be done about it, it should be reported at once to the security manager.
- Report fires promptly to the Fire Department. Do not risk your life in trying to extinguish a fire which may get out of control. Only use a fire extinguisher or fire hose if proper training has been received, and the proper type of extinguisher is available.
- Know the facility emergency procedures and what the security roles and responsibilities are when emergency situations occur as per post orders.

## **Hand Tools/Equipment**

- Always use the proper tools for the job and examine them for flaws, correct sizes and cutting edges before using.
- If tools are found to be defective, do not use them, tag them as unsafe, return them and obtain proper tools before starting the job.
- Keep hand tools clean at all times to avoid slipping, glancing, etc.
- Use wrenches of proper size for the job, and place them so the pull forces the jaws onto the nut or stud head.
- Keep hands out of the path of sharp tools. When using a knife or chisel, cut away from your body instead of towards it.
- Do not leave tools lying where others can slip or trip over them.
- Safety glasses, protective clothing, gloves, appropriate footwear, other personal protective equipment must be used and appropriate to the task.
- Employees shall not use power tools unless authorized and eye protection is worn, and depending on noise levels hearing protection is to be used.
- Electrically operated tools should be inspected to ensure that they have a ground, or are double insulated and that their cords are not defective.
- Use only approved grounded extension cords, and use ground fault circuit interrupters (GFCI) when using power tools outside.
- All defective equipment shall be reported to the manager or immediate supervisor who will take steps to correct the unsafe condition.

## Housekeeping

Good house-keeping is the fundamental preventive measure for all possible accidents.

- A high percentage of accidents have been caused by poor housekeeping practices within an employees work area. Some of these included slip/trip/falls, fires, strains while carrying objects through obstacle courses, and being stuck by or striking against falling objects or materials in pathways. Periodic cleanups are not sufficient. Housekeeping must be a continuous process to prevent accidents to employees and our customers.
- Each employee is responsible for cleaning up his/her own work area.
- Aisles and passageways shall not be used for the storage of stock.
- Oil, grease, liquids, or other items, when spilled, shall be immediately wiped up or sprinkled with absorbent floor compound. Secure the area to prevent exposure to others if substances cannot be cleaned up immediately.
- Walkways, stairs and fixed ladders shall be kept free of obstructions.
- Rubbish shall be placed only in appropriate containers.
- Keep exits clear at all times. Exit and fire doors should never be blocked or made inoperative.
- Lunchrooms, restrooms, and work areas/posts must be kept clean.

“Do’s” on house-keeping:

- Dispose of rubbish and dirt daily, or more frequently, from work area.
- Dispose of rubbish, dirt and used rags or paper towels in approved areas or containers.
- Keep all aisles clear from any debris.
- Keep machinery in good working condition.
- Keep Materials in order.

“Don’ts” on house-keeping:

- Do not block aisles, stairways, entrances or emergency exits.
- Do not leave machines or tools un-repaired or out of service.
- Do not skip daily maintenance check-out.
- Do not store materials in wrong places.

## Ladders & Stairs

- All ladders should be inspected regularly and checked before using to make certain that rungs, steps, side rails, feet and locks are in sound condition. Defective ladders should be taken out of service immediately.
- Portable straight ladders should be firmly placed on secure level footing. If there is danger of slipping, they should be held by a fellow worker or tied in place. The desirable climbing angle for straight ladders is about 70 degrees, or the base of the ladder should be positioned about 1/4 of the distance of the height of the ladder from the top support point. Verify ladder is rated for the weight of the person using the ladder.
- Both hands shall be kept free and used when ascending/descending a ladder. Maintain three

points of contact with the ladder at all times and always face the ladder when going up or down. Tools, tablets, clipboards, radios, or materials shall not be carried in the hands while climbing or descending a ladder. If necessary place item in/under your belt or obtain a carrying device when needing to go up or down a ladder.

- When on a ladder, exercise caution. **DO NOT** over reach either side of the ladder to perform work and **NEVER** work from the top rung or step of the ladder. Always use the appropriate sized ladder for the job, and work two or more steps from the top.
- Barrels, boxes, chairs, desks, or crates shall not be used as substitutes for stepladders, portable steps or work platforms, and ladders should not be placed on top of them to obtain additional height.
- All portable ladders shall be equipped with safety feet.
- Portable metal ladders should never be used while working on or near any electrical circuits. They should be legibly marked with signs reading, “**CAUTION-DO NOT USE AROUND ELECTRICAL EQUIPMENT**”, or similar wording.
- Packages or other materials carried on stairs should be held so vision is not obscured.
- Verify stairs are in good shape, free of debris, grease, oil, and ice, and well lighted so steps/treads are visible. If lights are out, or if stairs are slippery do not use them, find a different route, and report condition to supervision to get it corrected.
- When hand rails are available, verify they are connected securely, kept clean and free of dust and grease/oil. Hand rails must always be utilized when ascending or descending stairs. Do NOT multitask (e.g. talking on a radio or phone, looking at paperwork or a tablet, looking off at a distant area) at any time while using stairs, pay complete attention to what you are doing at all times.

## Material Handling/Lifting

Learn the proper techniques for how to lift objects properly:

- Size up the load before lifting. If the load is too heavy or bulky, do not try to move by yourself, get help.
- Get a firm grip and footing.
- Squat down, bending your knees.
- Tighten stomach muscles
- Grasp the load close to your body
- Keep your back straight
- Lift with your leg muscles not your back
- Employees shall only lift objects in the approved manner.
- Lifting or lowering operations being performed by several persons shall be done on signal from only one person and only after everyone’s feet and hands are in the clear.
- When possible, a hand truck, forklift or hoist should be used to lift heavy or bulky objects. Stand clear of all suspended or overhanging loads.
- All stacked materials, cargo, etc. shall be arranged in an orderly manner for convenient and safe handling. Consideration is to be given to size and weight, for safety reasons larger and heavier objects are to be placed on the bottom.

- Neckties, finger rings and loose clothing should NOT be worn by persons handling stores or material, or near any rotating machines or conveyers.
- Only authorized persons who have been properly trained are allowed to operate hoists and industrial trucks (forklifts).

## **Office Safety**

Safety is just as important in the office as it is in the industrial operations. Although the majority of injuries occurring in offices are minor, the potential for serious injury exists. Because Paragon maintains approx. 700 offices across the United States and Canada, the number of employees who face injury in the office environment is large. In addition, a number of our clients consist of, or maintain, large office environments. A bank or the large Corporate Office of a Fortune 500 client will also present office hazards for our employees.

The biggest danger in the office is the failure to recognize potentially hazardous situations. In a factory where large machines operate with fast-moving parts, there are constant reminders of danger. Along every assembly line are warning signs, guards and devices to protect the hands which operate the machines and supervisory personnel to emphasize safe work practices. Such precautions are rare in the office. Because hazards are not identified, they are often not seen as hazards. A makeshift extension cord snakes across a traffic corridor to reach the coffee pot. A paper cutter perches precariously on a work shelf, its blade in the upright position. The lower drawer of a file cabinet is left open at the three o'clock break. For the unwary, each of these situations is dangerous.

The establishment of a safety management committee can be an effective accident prevention measure, especially when the office operation is large or the location of the office is removed from the rest of the facility. Here are some hazards to be considered by office personnel.

## **Running; Slipping; Tripping; Falling**

Most commonly, injuries suffered by office personnel result from slips, trips, and falls (STF) or moving quickly through the office areas. The office manager and employees should see that the following precautions are taken:

- Running or quickly moving through offices or hallways to rest rooms or time clocks can cause accidents. Signs reading "Walk, Don't Run" should be posted.
- Slipping hazards may be created by materials on the floor, or by the failure to use a non-slip floor preparation. Floors should be kept uncluttered and in good repair.
- Special storm mats should be provided at building entrances when there is a chance of floors becoming slippery.
- During the winter months, a supply of ice melting chemicals should be kept on hand and used on outside walkways, stairs, and ramps, or as dictated by the post orders.
- Stairways should be kept clean, well-lighted, and equipped with non-slip treads and suitable handrails.
- Differences in floor elevation in aisles or passageways should be eliminated or clearly marked with a highlighting color e.g. safety yellow.
- Power and telephone outlets should be installed flush with the wall, or so located that they are not a hazard to employees. Cords should be kept off the floor and out of areas where employees walk.

## Office Equipment

No electrical conducting parts should be exposed, and all metal parts should be grounded. Only properly trained persons should operate office machines. Repairs should be made by competent, trained service personnel. Additional precautions that can be taken in the office include the following:

- Keep desk or file cabinet drawers closed.
- Always use the handle to close file or desk drawers to avoid pinching your fingers. Don't open more than one drawer of a filing cabinet at a time. Files may tip when more than one drawer is opened when not properly secured.
- File cabinets, metal lockers, and shelves should never be overloaded. File cabinets should be anchored securely to walls or floors or to each other. The drawers of file cabinets should be kept closed when not in use.
- Material should not be stored on top of lockers or file cabinets or in other high places not designed for this purpose.
- Swivel type chairs present the potential for serious injury due to falls. Proper posture and slow pivoting movements while sitting in such a chair will decrease this hazard.
- Don't tilt chairs backwards or lean it up against a wall or other object.
- Chairs with rollers are to be used on even smooth surfaces and rollers are to be checked periodically to make sure they are in good working order. If matts are used on carpeted or other areas, they are to be big enough to minimize rolling chair off the matt and causing tipping action.
- Overloaded outlets resulting from the use of multiple outlet adapters and extension cords should be avoided.
- Don't drive nails in walls to hang bulletin boards or other articles. If hangers are necessary, suitable ones should be installed.
- Don't store sharp objects such as unprotected knives, blades and scissors in desk drawers.
- Electric fans should be properly mounted, guarded, and maintained in good operating conditions.
- The movement of boxes or bundles of office supplies, ledgers, portable filing cases, and various other types of office equipment e.g. printers, computers, monitors create lifting hazards. Hernias, sprains, and strains can occur when improperly lifting or shifting equipment and supplies.
- Employees involved in the handling of heavy or awkward materials should be trained in proper lifting methods. They should never attempt to lift oversized loads. Proper lifting involves using the legs, not the back.
- Handles should always be used when raising, lowering, or sliding windows, and whenever opening or closing doors or gates to minimize potential pinch point injuries.
- Many painful injuries are the result of paper cuts and punctures from staples. Supervisors should periodically warn their employees of these hazards.
- Ceiling fixtures should be inspected immediately after installation and after repair or replacement.

## Falls on Level Surfaces

- Office workers account for forty-seven percent of job-related falls. The major cause of these falls is the worker tripping over objects. Employees' trip over such items as telephone or electrical cords, floor mounted outlets, defective floor surfaces including broken, cracked tiles or worn/torn carpet, frayed or loose rugs and plastic carpet covers with curled edges.

- Inadequate housekeeping is also a major contributor to employee falls. Cluttered aisles or other walking and working surfaces account for approximately one third of the recorded injuries.
- Extreme lighting contrasts significantly contribute to falls. Employees or customers who walk from bright light into dim areas are noticeably susceptible to falling over unseen objects.
- Wet and slippery surfaces also cause numerous falls. Wet surfaces can be caused by leaky roofs, refreshment spills at vending machines, spillage at water coolers and during floor cleaning. Lack of warning signs indicating wet surfaces often lead to slips, trips and falls.
- During an inspection, surface conditions should be assessed especially for designated patrol routes. Uneven, broken, cracked or badly worn surfaces should be identified and repaired. Wet surfaces should be cleaned and the cause should be identified and corrected. Extension cords, telephone cords and pneumatic lines should be rerouted overhead or protected by suitable covers. Aisle space should be clear and materials should not be stored in walking/working areas. All areas should be adequately lighted. Frequent inspections of lighting systems should also be included.

## **Smoking**

If employees have smoking privileges, precautions such as the following should be observed to reduce the possibility of fire:

- Employees should never leave lighted cigarettes on desks.
- Ash trays should always be used for disposal of cigarettes, cigar butts and burned matches.
- Employees should never empty ashtrays or put cigarette butts into waste baskets this should only be in done in covered metal containers. Containers should be provided for this purpose and shall be conveniently located in the permitted smoking area(s).
- Flammable liquids, such as lighter fluid and butane gas, should not be stored in desk drawers or file cabinets. Containers should be stored upright in metal cabinets, away from any heat producing devices.

## **Equipment Maintenance**

- Falls can result from a person's slipping on grease, oil or other lubricants which maintenance personnel use to service equipment. If noted after equipment has been serviced, Maintenance personnel should be instructed to clean lubricants from walking and working surfaces before leaving the area where work was conducted.
- Fluid leakage from mechanical powered equipment is another hazard. Spilled or leaking hydraulic fluids or oils should be immediately cleaned with appropriate absorbents. If found, area is to be secured to prevent foot traffic through the area until the spill has been cleaned up.

## **General Environment**

- Two-way traffic around blind corners should be separated by lines painted on the floor or, if necessary, by railings.
- All projections in regular aisle spaces should be removed.
- Falls can result from slips on grease, oil, or other fluids in parking areas. Indoor areas, in particular may have dim lighting.



- Public areas should be maintained by the owner of the building. Don't hesitate to demand safe housekeeping from your landlord.

Unsafe office conditions are discovered through periodic inspections by supervisors or by an inspection committee. Unsafe conditions observed should be listed and retained until corrective action has been taken. Supervisors must be on the watch for unsafe work practices and conditions and must take corrective action when such conditions are found.

- Do not run, jump or engage in horseplay at any time.
- Only trained personnel should operate or work on electrical equipment such as photo copy machines, presses, cutters, computer equipment, etc.
- Make sure that fingers are clear of "guillotine" type paper cutter blade before pushing down on blade. And, that the blade is always replaced to the closed/secured position after use.
- Do not use scissors for opening boxes, use an appropriate cutter, and making sure to stand clear and hands clear before carefully opening the box.
- Foot wear is required while walking around the office to prevent the spread of fungus and bacteria, and prevent foot punctures and lacerations from staples, tacks, etc.
- **Employees are to watch where they walk!** Do not go into dark places without adequate lighting unless a flashlight is available. Always use handrails on stairways and ramps and avoid rushing around blind corners, past doorways or in corridors.
- Open all doors without windows slowly to minimize striking individuals or being struck by a door that may be opened by approaching individuals on the other side of the door.
- Do not stand or climb on chairs, boxes, crates or shelf units. Use appropriate step stool or ladder and do not wear platform shoes when climbing.
- Heavy objects should not be placed on high shelves or cabinet tops because putting them up or taking them down might cause a strain. In addition, objects could fall, especially during an earthquake.
- Always use proper lifting/material handling techniques when lifting office equipment, files, etc. Bend knees, grasp the load firmly and close to the body, lift using your leg muscles and keep back straight. Get help for heavy or awkward loads.
- Computer work stations should be properly arranged to provide maximum comfort. Chair height and lumbar support must be adjusted so the upper legs are parallel with the floor and there is back support. The keyboard height should be adjusted so the employee's and wrists are in a straight "neutral" position (not bent) or resting on sharp edges when keying. The video display must be adjusted for proper angle, height and to prevent glare, neck & shoulder strain, and within 18-24" from the user to minimize eyestrain. Difficulties in adjusting equipment and/or work station design should be reported to your manager or supervisor.
- Do not pull open more than one file cabinet drawer at a time. Make sure file cabinets and bookcases/shelves over 5' high are firmly anchored to the wall to prevent tipping over.
- Always close file drawer when you leave the cabinet to prevent someone else or yourself from tripping over the drawer.
- Load file cabinets so the heaviest load is in the bottom drawer. Never leave the bottom drawer empty when files are in the upper drawers.
- Immediately pick up or wipe up spilled things such as coffee, paper clips, etc.



- To maintain sanitation in the break area, employees should clean their own messes, wipe out spilled foods in the microwave oven, and remove all perishable food stuffs from the refrigerator for weekly cleaning.
- All electrical equipment and appliances should be turned off when not in use.
- Electric cords of any kind shall be properly fastened and protected so they do not create tripping hazards.
- Office decorations should be made only of approved fire resistant materials.
- Smoking is only allowed in designated areas.
- Learn the location and proper use of the correct type of fire extinguishers for the type of occurring fire.
- Know the emergency egress route and procedures for your area in case you may have to evacuate the office. And know your assigned roles & responsibilities that are to be carried out during an emergency.



# Job Site Security

## Purpose & Scope

The purpose of this plan is to provide guidance and requirements necessary for jobsite security for Paragon operations. Typically, Paragon is the provider of security protective services (guarding) at job sites. Paragon Security Officers man fixed guard posts and provide roving guards (foot patrol and vehicle patrol) based on client requirements.

This procedure applies to all Paragon employees. Typically, Paragon provides security protective services for regulated (MTSA/CFATS) sites and there is a client provided Facility Security Plan (FSP) or Site Security Plan (SSP). In these cases, the owners FSP or SSP shall take precedence.

This document covers Paragon employees and contractors and shall be used on owned premises, or when an operator's program doesn't exist or is less stringent.

## Definitions

### 1. Variance

A documented exception to a Standard, or Procedure that provides justification for, and management acceptance of, the exception.

### 2. Must, Shall, Should, May

Must is used where a provision is a statutory requirement.

Shall is used where a provision is mandatory.

Should is used where a provision is preferred.

May is used where alternatives are acceptable.

## Roles and Responsibility

1. **District Managers/Field Service Managers** – are responsible to ensure that these guidelines are followed and for notifying the Paragon Regional Management if the Security force is tasked with any activities that may result in potential exposures.
2. **Employees** - shall understand this program, follow its guidelines and report any unsafe work conditions

## Procedures

### 1. General

- » The Paragon Jobsite Security program is committed to prevention and/or reduction of security breaches/incidents. This is the primary reason for Paragon to be on the jobsite.

### 2. Risk Assessment

- » A risk assessment must be conducted to evaluate the risk of jobsite security incidents. Paragon must assess the risk of security incidents. A general Risk Assessment should be

performed at the company level to address common risks across job sites.

- » Security should also be addressed at each job site during pre-job meetings/toolbox talks/hazard assessments (JSAs). Affected employees should be provided an opportunity to participate in risk assessments.
- » A general jobsite risk assessment is provided in Table 1. For security regulated facilities any risk assessments required in the client facility FSP or SSP may take precedence. Typically, these assessments are considered sensitive information and are protected from disclosure.

### **3. Measures that can be used to reduce Jobsite Security Incidents**

- » Paragon must implement control measures to reduce or eliminate security incidents. This may include, but is not limited to, posted signage, restricted access to work areas, locked doors, keycards, security cameras, alarms, fencing, lighting, personal protective devices, security guards, background checks, time-lock safes and other robbery prevention measures.

### **4. Reporting.**

- » Jobsite security incidents must be reported immediately. Paragon must ensure security breaches/incidents are reported immediately. If the incident occurred at a client site, the client host should be notified immediately.

### **5. Incident Investigation**

- » An incident investigation will be conducted following a jobsite security incident. Paragon must ensure an incident investigation will be completed when a jobsite security incident occurs. The goal of the investigation is to identify root causes and take corrective action to reduce the potential for future incidents.

## **Training**

Employees are informed of the company's jobsite security policies and procedures. Paragon must ensure employees are trained on policies, procedures and workplace arrangements to prevent security incidents, the appropriate response (including how to obtain assistance) and procedures for reporting, investigating and documenting security incidents. Retraining shall be provided any time these policies or procedures are changed or updated.

All training shall be documented and retained in the Paragon Learning Management System (LMS).

# Appendix

## Jobsite Security Risk Assessment

Jobsite Name:

Item	Yes	No	N/A	Control Measures/Comments
Are background checks conducted on all employees in sensitive jobs and following transfer requests to more sensitive jobs?				
Is appropriate perimeter protection in place?				
Are physical barriers in place that limit vehicle access where required				
Are the perimeter doors, gate, windows, and docks secured and in good working condition?				
Are the perimeter doors, gate, windows, and docks adequately staffed during working hours and secured after hours?				
Are security surveillance cameras and perimeter (docks, doors, gates, and windows) alarms in place?				
Are surveillance video records properly archived?				
Are security cameras and alarms inspected and tested on a regular basis?				
Is there regular patrolling of the perimeter to inspect the fence line damage, clear zone, obstructions, unoccupied/unidentified vehicles and other breaches?				
Is the perimeter lighting adequate?				
Is there a parking lot security plan in place?				
Are proper warning signs posted (e.g. no trespassing, driver direction, restricted areas, etc.)?				
Are all visitors and contractors screened and required to sign-in/sign-out and produce valid photo identification?				
Are sensitive areas identified and properly secured for authorized access?				
Are locks changed immediately when the key controls are compromised?				
<i>Add Others as Needed for Specific Jobsite</i>				



## SECTION 1

# Heat Illness Prevention Program (HIPP)

## Heat Illness Prevention Program (HIPP)

**The following person(s) have the authority and responsibility for implementing the provisions of this program at the following location:**

Site Name: \_\_\_\_\_ Date of Completion: \_\_\_\_\_

District Manager: \_\_\_\_\_ Phone Number: \_\_\_\_\_

Site Supervisor: \_\_\_\_\_ Phone Number: \_\_\_\_\_

The purpose of this document is to provide Paragon Supervisors with training on Heat Illness Prevention Planning, to include the following: Risks of Heat Illness, Access to Water, Access to Shade, First Aid, and Emergency Medical Services. All Supervisors must be trained in heat related illness. This supervisory training includes training in the company's procedures for heat illness prevention, procedures, to be followed when an employee exhibits symptoms of heat illness, and emergency response procedures. A copy of these heat prevention program procedures shall be made available to all employees.

This document is considered a working document and will be reviewed on an as needed basis, but no less than annually by the Site Supervisor and/or Paragon Management. This document meets and/or exceeds the Heat Illness provisions of the Cal OSHA Title 8 Regulations and Federal OSHA Regulation CFR 1910.132(d).

### Risk of Heat Illness Analysis

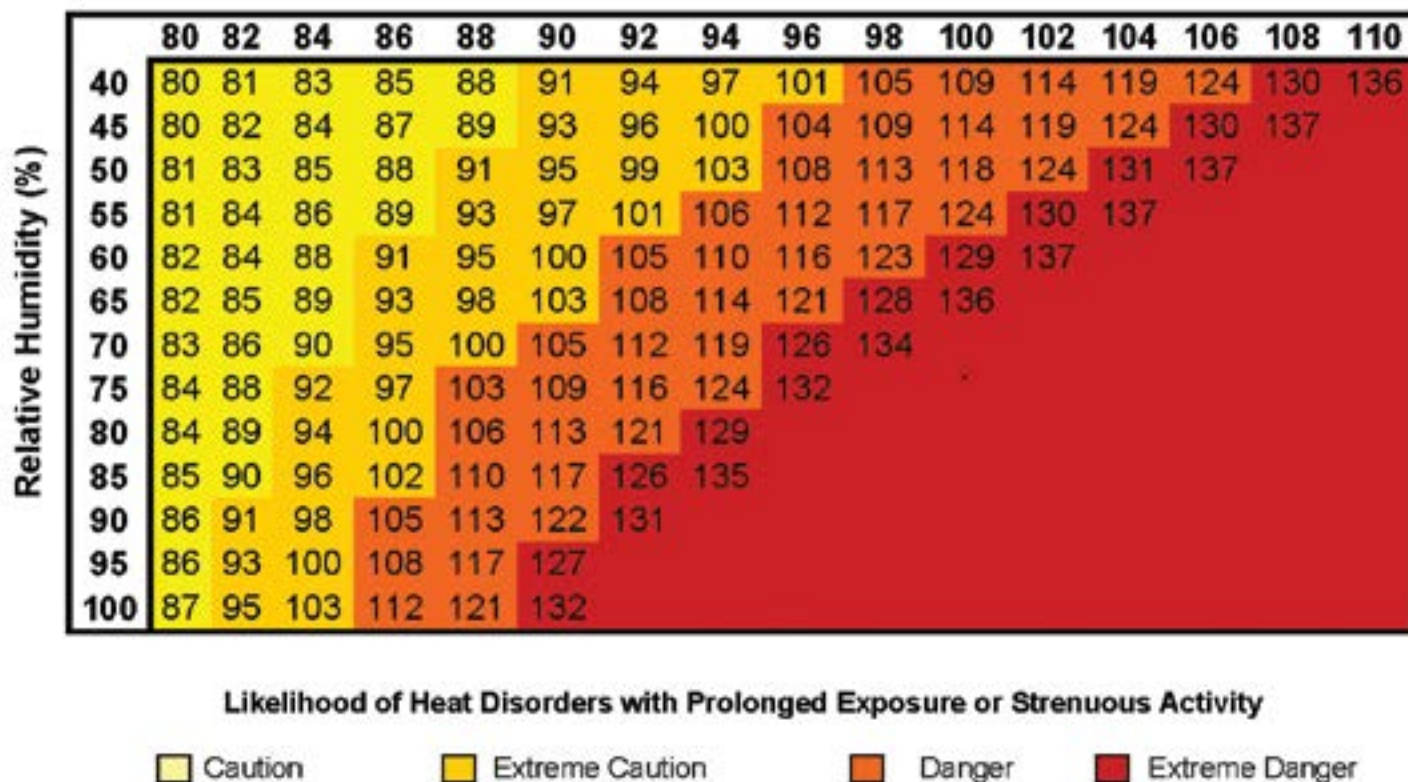
Supervisors are responsible for the safety of their employees and as a part of their duties, they are to monitor the health and safety of employees, and take prompt action in response to any identified Heat-Related Illness hazards. Supervisors should stay in contact with officers to monitor breaks, water, shade, and the health and safety of on duty officers.

The supervisor on site will identify and evaluate the environmental factors on a day-to-day basis and provide guidance by implementing daily hot weather precautionary plans based on the utilization of the National Weather Service Heat Index guideline. It explains the risk based on actual or anticipated temperatures and when extra precautions are needed.

During warm weather, at the beginning of each shift, Officers should be advised of the expected heat index for the day and what precautions need to be taken to prevent heat illness if any. Updates regarding precautions to be taken are to be given if conditions worsen.

# NOAA's National Weather Service

Heat Index | Temperature (°F)



In order to determine the Heat Index in the above chart you need to know the air temperature and the relative humidity (e.g., if the air temperature is 100°F and the relative humidity is 55%, the heat index will be 124°F).

Heat Index	Risk Level	Protective Measures	Likely Body Effects
<b>Below 91°F</b>	Lower (Caution)	Basic heat safety & planning	Fatigue Possible
<b>91°F - 103°F</b>	Moderate (Extreme Caution)	Implement precautions & heighten awareness	Sunstroke, Muscle Cramps, &/or Heat Exhaustion Possible
<b>103°F - 115°F</b>	High (Danger)	Additional precautions to protect workers	Sunstroke, Muscle Cramps, &/or Heat Exhaustion Likely
<b>Above 115°F</b>	Very Hi - Extreme (Extreme Danger)	Triggers even more aggressive protective measures	Heat Stroke or Sunstroke Highly Likely



## Access to Water

Paragon must provide potable drinking water free of charge to employees. Water may be provided via a drinking faucet, water dispenser or any other type of Company/Cal OSHA/Federal OSHA approved method for our employees to get needed hydration. If the drinking water is coming from a non-plumbed source (e.g., bottled water, 5-10 gallon jugs of water, etc.) it must be fresh, pure, suitably cool and provided per the Cal OSHA standard which is designated at a minimum of 4 cups/ hour (1 quart /hour or 2 gallons/shift) per employee at the start of each shift. At job sites where drinking water is not plumbed or otherwise continuously supplied at the beginning of the shift a lesser amount of water may be provided if effective procedures are in place for replenishment during the shift as needed to allow employees to drink the above or more amounts. Water levels are to be rechecked at least every 4 hours. Water checks are to be documented and saved.

In addition to the water checks, at any time officers have used more water than normal due to high temperatures, the officers can call for additional water to be provided upon request.

It is important for supervisors to stress the frequent consumption of small amounts of water, up to 4 cups per hour, when the work environment is hot.

For the aforementioned client site:

### Potable Drinking Water is Available by:

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(Please list drinking faucets, bottled water, jugs of water, etc.)

*Note: If large bottles or jugs are used, disposable paper cups & dispensers are to be made available to workers and availability verified at the beginning of each shift.*

### Potable Drinking Water is Located at:

---

(Please list any and all locations, e.g., guard shacks, main gate, drinking fountains throughout building(s), break rooms, main security area etc., and/or attach diagram/drawing indicating locations)

*Note: Water containers are to be placed as close as possible to the workers to encourage frequent drinking of water. If layout of worksite prevents water from being placed close to the workers, bottled water or personal water containers will be made available so workers can have drinking water readily accessible. All water containers are to be kept in sanitary condition.*

### Potable Drinking Water Levels are Checked by:

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(Please indicate the title of the person who will be checking the levels and/or quantity)

### Potable Drinking Water Levels are Checked:

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(Please indicate the frequency of checks per shift, e.g., at each scheduled break period, or every 4 hours, etc.)

## Access to Breaks/Shade

Paragon must provide breaks and shade to protect employees from heat illness. Shade is mandated/required and shall be provided when outdoor temperatures approach or exceed 80° F, and shall be made available upon employee request if temperatures approach or are below 80° F. Shade shall be provided and maintained in one or more areas at all times while officers are on duty that are either open to the air or provided with ventilation or cooling. Examples of areas or items that are to be made available include ventilated/air conditioned guard houses, hats, air conditioned vehicles, canopies/tarps, umbrellas, buildings, trees, overhangs, or any other edifice that can provide adequate shade to employees. Paragon will either provide shade or provide timely access to shade, within a 2-3 minute walk, to protect employees from heat illness.

The shade areas present shall be at least enough to accommodate the number of officers assigned to the site/post on any one shift while on recovery, rest, or lunch periods so they can sit in a normal posture fully in the shade. If canopies/tarps or umbrellas are provided they are to be adjustable to provide shade depending on level of sun.

When temperatures are 80° F or above, employees shall be allowed and encouraged to take a preventative cool down rest (PCDR) period in the shade for a period of no less than 5 minutes at a time when they need to do so to protect themselves from overheating. If temperatures exceed 95 o F as a minimum a 10 minute break is to be taken every 2 hours. Such access to shade is permitted at all times. If an employee's work day exceeds 8 hours, an additional PCDR period is required at the end of the 8th hour and every 2 hours thereafter.

For the aforementioned client site:

### Access to Shade is Located:

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(Please list any and all shade locations, e.g., guard shack, main gate, air-conditioned car, etc.)

Preventative cool-down rest (PCDR) shall be permitted whenever requested by an officer. When taken the supervisor or designee shall:

- Monitor the employee on the PCDR and inquire if employee is experiencing any symptoms of heat illness
- Encourage the employee to remain in the shade until cooled down
- Not order the employee back to work until all signs or symptoms of heat illness have abated
- In all cases, the employee shall be required to remain in the shade for at least 5 minutes

*Note: The time taken to arrive at the shaded area shall not be counted as time in the shade*

**If an officer needs additional breaks/PCDRs to get relief from the heat, the following process will be followed:**

- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

(Please list steps officers are to take to request and obtain additional breaks/PCDRs as needed)

If an employee cannot reach the designated person(s) as indicated in the above process, employees are permitted to take the additional break/PCDR and are to continue trying to make notifications while in route to and/or at the shaded area.

Where the client job site creates a condition where it is infeasible or unsafe to have a shade structure, or otherwise to have shade present on a continuous basis, alternative procedures for providing access to shade that provides equivalent protection shall be written and implemented. The alternative procedures are to be maintained at the jobsite with this plan.

## **Heat Acclimatization**

During Heat Waves (any day where predicted high temperatures will be at least 80° F and at least 10 degrees higher than the average high daily temperature for the preceding 5 days) all employees working outdoors in the heat are to be closely observed by supervision or a designee and encouraged to take it easy, drink water, and take breaks as needed to cool down. Heat Waves will be determined by the site supervision based on monitoring of the temperatures at the site over 5 day periods.

All new employees working outdoors are also to be closely observed by supervision or a designee during a two week (14 day) break-in period if they begin work during a heat wave, and encouraged to take it easy, to lessen the intensity of strenuous activities, drink water, and take breaks as needed to cool down until they become acclimated to their work duties.

## **High Heat Procedures**

The following high-heat procedures are to be followed when the temperature equals or exceeds 80° F:

1. Where practicable, effective communication by voice, observation, or electronic means will be maintained, so that all employees at the worksite can contact a supervisor when necessary. If the supervisor is unable to be near the workers to observe or communicate with them, then an electronic device, e.g., a cell phone or texting device may be used if area reception is reliable.
2. All employees shall be closely observed by supervision during a heat wave (any day when predicted high temperatures shall exceed 80 o F or at least 10 degrees higher than the average high daily temperature in the preceding five days).

3. Observation of employees for alertness and signs/symptoms of heat illness or by regular communication with sole employees such as radio or cell phone. All calls/checks are to be documented and saved.
4. Employees will be reminded throughout the work shift to drink plenty of water.
5. Closely supervise new employees during their first 14 days of employment until they become acclimated to their work duties, unless the employee(s) indicate that he/she has been doing similar work at least 10 of the past 30 days for 4 or more hours/day.
6. Supervisors shall conduct a review of the High Heat procedures at the beginning of each workday on each day that temperatures are to exceed 80o F. Review shall include encouragement to drink plenty of water throughout the day, to remind employees of their right to take a cool-down rest period in the shade as necessary, and procedures to follow if experiencing heat illness symptoms.

The above are minimum procedures. Additional procedures are to be supplemented as appropriate.

## **Access to First Aid/ Activation of Emergency Medical Services (EMS)**

In the event an employee has any of the symptoms or referenced heat illnesses listed below, the employee must be able to have effective communication by voice or electronic means, e.g., a cell phone or text messaging device, at the work site where reliable reception is available to contact their Supervisor or Emergency Medical Services directly when necessary. If reliable service is not available other means for summoning EMS shall be provided.

Depending on the severity of the heat illness the employee, supervisor, designee, or fellow officer will call Emergency Medical Services (EMS) at **911** if Emergency Medical Technicians (EMT) are not located on site. If on site EMTs are unresponsive, **911** is to be called. This call may be made by the officer at any time if there is no response to a call made for assistance. Supervisors should have a back-up plan to contact EMS if **911** is unreachable for some reason.

Supervisors should also consider EMS access to an injured employee, and may need to consider moving that employee to a safe area or an area where EMS can pick-up the patient (plan on having a cart or vehicle ready for transport if EMS cannot access a particular area of a worksite). Any employee that activates EMS should have a map, be able to give directions to EMS to respond, or know directions into/unto any site where any employee is suffering from heat illness.

Whenever an employee exhibits signs or symptoms of heat illness, the employee is to be monitored and will not be left alone. The employee will not be sent home without being offered onsite first aid and/or be provided emergency medical services.

Emergency Medical Technicians are (check one):    ☐ Available on Site    ☐ Not available on Site

Supervisor No: \_\_\_\_\_ EMT Contact No.: \_\_\_\_\_ Contact EMS: **911**

## Heat Related Illness, Signs and Symptoms, First Aid Provision

Heat Related Illness	Signs & Symptoms	First Aid
<b>Sunburn</b>	Red, hot, skin may blister	Move to shade, loosen clothing, apply cool compresses or water
<b>Heat Rash</b>	Red, itchy skin, bumpy skin, skin infection	Apply cool water or compresses, control itching & infection with prescribed medication
<b>Heat Cramps</b>	Muscle cramps or spasms, grasping the affected area, abnormal body posture, moist skin, nausea	Drink water or sports drinks, rest, cool down, massage affected muscle, get medical evaluation if cramps persist
<b>Heat Exhaustion</b>	Weak, high pulse rate, extreme sweating, cold, clammy, pale skin, insecure gate, headache, vomiting, clammy & moist skin, weakness/dizziness, fatigue	Move to shade & loosen clothing, initiate rapid cooling, lay flat & elevate feet, monitor recovery, drink small amounts of water, evaluate mental status (ask who, where, when questions), if no improvement call 911
<b>Heat Stroke</b>	Any of above but more, severe & dry/hot skin, stops sweating, altered mental status with confusion or agitation, can progress to loss of consciousness & seizures can be fatal	Call 911, immediately move to shady cool area, start rapid cooling with water & fanning, lay flat & elevate feet, loosen clothing, if conscious give sips of water, monitor airways & breathing, administer CPR if needed, stay with worker until help arrive

## Employee Training

All employees, both supervisors and non-supervisor employees, will receive training in the company's heat illness prevention procedures. This training is to be given before officers begin work where it is anticipated that an exposure to heat illness exists. This training must include:

1. The environmental and personal risk factors for heat illness, as well as the added burden of heat load on the body caused by exertion, clothing, and personal protective equipment.
2. Company procedures for complying with requirements of this standard.
3. The provision of water, plumed or other method, and the importance of frequent consumption of small quantities of water, up to 4 cups/hour, when the work environment is hot and employees are likely to be sweating more than usual in the performance of their duties.
4. The provision of preventative cool down rest (PCDR) periods, frequency, and locations that are provided for cool down.
5. The concept, importance, and methods of acclimatization.

6. The different types of heat illness and the common signs & symptoms of heat illness, and appropriate first aid and/or emergency responses to the different types of heat illness, and how heat illness may progress quickly from mild symptoms and signs to serious and life threatening illness.
7. The importance to employees of immediately reporting directly or through their supervisor, symptoms or signs of heat illness in themselves or in co-workers.
8. Company procedures for contacting emergency medical services, and if necessary, for transporting employees to a point where they can be reached by an emergency medical service provider.
9. Company procedures for ensuring that in the event of an emergency clear and precise direction to the work site can and will be provided as needed to emergency providers.

## **Supervisor Training**

Prior to supervising Paragon employees performing work that should/could reasonably be anticipated to result in exposure to the risk of heat illness, Supervisors will be trained on the following topics:

1. The same training information provided to all employees.
2. The procedures the Paragon Supervisor is to follow to implement the applicable provisions in the Paragon Heat Illness Prevention Program.
3. The procedures/immediate action the Supervisor will follow when an Officer/employee exhibits signs or reports symptoms consistent with the possible heat illness (e.g., but not limited to, decreased level of consciousness, staggering, vomiting, disorientation, irrational behavior, or convulsions), including emergency response procedures commensurate with the severity of the illness.
4. How to monitor weather reports and how to respond to hot weather advisories provided through agencies e.g., the National Weather Service at [www.nws.noaa.gov](http://www.nws.noaa.gov), local service numbers, the Weather Channel TV Network, or other local news and weather stations on TV and radio.

## **Communication**

Communication is an essential aspect of the Heat Awareness Program. Employees must be provided a way to contact or activate EMS either via cell phone, through main dispatch, landline, or via radio. Paragon is committed to providing initial and annual refresher training for Paragon employees on Heat Illness Prevention. A copy of the employee training document and employee acknowledgement of the training is provided with document as a sample. Training shall be conducted and reinforced via daily tailgate safety meetings, monthly company required safety meetings, or annually in a classroom type setting with a short test after training is completed. Close supervision of employees for the first 14 days on the job during high heat conditions is mandatory.

Employees are advised upon hire and annually of the Company's commitment to provide a safe and healthful workplace for our employees. This is a primary concern of the Company and one we take seriously. It is the responsibility of all supervisory personnel to establish, maintain and monitor safe work practices. Equally important, all employees have the responsibility to perform their jobs safely and to notify their supervisor of any potential work hazards. Consider utilizing a "buddy system" approach to monitoring other employees.

Every supervisor will know how to implement this program, train this program, and enforce this program's standards. The supervisor must also be able to access weather reports and react appropriately to hot weather advisories.

Supervisors that anticipate a high heat index should communicate with the employees on the site before their shifts to reaffirm the Paragon Heat Awareness Plan. Supervisors should be knowledgeable about what procedures to follow when an employee exhibits any symptoms of heat illness up to and including activation of the EMS.

## Definitions

"Acclimatization" means temporary adaptation of the body to work in the heat that occurs gradually when a person is exposed to it. Acclimatization peaks in most people within four to fourteen days of regular work for at least two hours per day in the heat.

"Heat Illness" means a serious medical condition resulting from the body's inability to cope with a particular heat load, and includes heat cramps, heat exhaustion, heat syncope and heat stroke.

"Environmental risk factors for heat illness" means working conditions that create the possibility that heat illness could occur, including air temperature, relative humidity, radiant heat from the sun and other sources, conductive heat sources such as the ground, air movement, workload severity and durations, protective clothing and personal protective equipment worn by employees.

"Personal risk factors for heat illness" means factors such as an individual's age, degree of acclimatization, health, water consumption, alcohol consumption, caffeine consumption, and use of prescription medications that affect the body's water retention or other physiological responses to heat.

"Shade" means blockage of direct sunlight. One indicator that blockage is sufficient is when objects do not cast a shadow in the area of blocked sunlight. Shade is not adequate when heat in the area of shade defeats the purpose of shade, which is to allow the body to cool, e.g., a car sitting in the sun does not provide acceptable shade to a person inside it unless the car is running with air conditioning. Shade may be provided by any natural or artificial means that does not expose employees to unsafe or unhealthy conditions and that does not deter or discourage access or use.

"Temperature" means the dry bulb temperature in degrees Fahrenheit obtainable by using a thermometer to measure the outdoor temperature in an area where there is no shade. While the temperature measurement must be taken in an area with full sunlight, the bulb or sensor of the thermometer should be shielded while take the measurement, e.g., with the hand or some other object, from direct contact by sunlight.



# 1A HEAT ILLNESS PREVENTION (HIPP) TRAINING ACKNOWLEDGEMENT

## PARAGON

I acknowledge that I have received training and understand the information given in the Heat Illness Prevention Program including Paragon's responsibility for water provision at the beginning of each shift and/or where potable water can be found in the workplace, the importance of drinking a minimum of 4 cups of water/hour and the procedures for notifying supervision if water supplies have reached less than half or the normally provided quantities, the importance of shade and taking breaks/rests to cool down in shaded or cooled areas, how to recognize signs and symptoms of heat related illness, and the first aid and emergency response procedures to follow should heat illness occur as required per Federal OSHA Regulations CFR 1910.132(d), CFR 1910.141 and CFR 1910.151 and Cal OSHA Title 8 Regulation CCR 3395.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name:

cc: Personnel File

# 1B HEAT ILLNESS PREVENTION (HIPP) SUPERVISOR TRAINING ACKNOWLEDGEMENT

## PARAGON

I acknowledge that I have received training and understand the information given on the Heat Illness Prevention Program including Paragon's responsibility for checking daily weather advisories for pending hot weather conditions and advising employees of pending conditions, for the water provision at the beginning of each shift and checking that water supplies are available and replenished as needed per shift, the importance of documented periodic checks on employees and encouraging employees to drink a minimum of 4 cups of water/hour, the provision of shade and reinforcing the taking of rest/cool down breaks as needed, the procedures to follow when employees exhibit recognized signs and symptoms of heat related illness and the first aid and emergency response procedures to follow should heat illness occur as required by Federal OSHA Regulations CFR 1910.132(d), CFR 1910.141 and CFR 1910.151 and Cal OSHA Title 8 Regulation CCR 3395.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name:

cc: Personnel File



## SECTION 2

# Injury and Illness Prevention Plan (IIPP)

# Injury and Illness Prevention Plan (IIPP)

## Responsibility

The Injury Illness Prevention Plan (IIPP) Administrator \_\_\_\_\_ (Insert name of Plan Administrator e.g. District Director) has the authority and responsibility for implementing the provisions of this program dated: \_\_\_\_\_ (insert date) for \_\_\_\_\_ (insert site name and address).

All managers and supervisors are responsible for implementing and maintaining the IIPP in their work areas and for answering worker questions about the IIPP. A copy of this IIPP is available from each manager and supervisor.

## Compliance

Management is responsible for confirming that all safety and health policies and procedures are clearly communicated and understood by all employees. Managers and supervisors are expected to enforce the rules fairly and uniformly.

All employees are responsible for using safe work practices, for following all directives, policies and procedures, and for assisting in maintaining a safe work environment.

Our system of evaluating that all workers comply with the rules and maintain a safe work environment includes:

- Informing workers of the provisions of our IIPP;
- Evaluating the safety performance of all workers;
- Recognizing employees who perform safe and healthful work practices. This recognition is accomplished by: \_\_\_\_\_ (Insert recognition program e.g. near miss program).;
- Providing training to workers whose safety performance is deficient;
- Disciplining workers for failure to comply with safe and healthful work practices. The disciplinary process is as follows: \_\_\_\_\_ (Insert disciplinary process); and
- The following practices are used to secure employee compliance with safe and healthful work practices:

(Insert how site and/or program specific work safety practices and procedures are verified)

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## Communication

Recognizing that open, two-way communication between management and staff on health and safety issues is essential to an injury-free, productive workplace, the following system of communication is designed to facilitate a continuous flow of safety and health information between management and staff in a form that is readily understandable and consists of one or more of the following items:

- New employee orientation including a discussion of Paragon and site-specific safety and health policies and procedures.
- Review of the site-specific IIPP.
- Workplace site-specific safety and health training programs.
- Regularly scheduled Safety Meetings are to be held at least \_\_\_\_\_ (e.g. weekly, monthly, quarterly, etc.), or more frequently as deemed necessary by the introduction of new hazards or occurrence of injuries or illnesses. Effective communication of safety and health concerns between employees and their supervisors, including translation where appropriate.
- Posted or distributed safety information.
- A system for employees to anonymously inform management about workplace hazards without fear of reprisal thru the Paragon Hotline.
- A safety management committee that meets regularly, prepares written records of the safety and health committees meetings, reviews results of the periodic scheduled inspections, reviews investigations of accidents and exposures and makes suggestions to management for the prevention of future incidents, reviews investigations of alleged hazardous conditions, and submits recommendations to assist in the evaluation of employee safety suggestion.

### Other:

(Insert additional site and/or program specific communication practices e.g. instructing employees orally, review of client required notification procedures, etc.)

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## Hazard Assessment

Periodically scheduled inspections to identify and evaluate workplace hazards shall be performed by the following competent observer(s) in our workplace:

Insert the name(s) / position(s) of individual(s) who complete these inspections. This should at least include the District Manager or may include site supervision or officers.

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Periodic inspections are performed according to the following schedule:

- When the IIPP is first established for this location.
- \_\_\_\_\_ (Insert frequency - daily, weekly, monthly, quarterly, etc.) at the beginning of each shift.
- When new substances, processes, procedures or equipment which present potential new hazards are introduced into the workplace;
- When new, previously unidentified hazards are recognized;
- When occupational injuries and illnesses occur;
- Whenever employees are hired and/or whenever permanent or temporary employees are reassigned to processes, operations, or tasks for which a hazard evaluation has not been previously conducted; and
- Whenever workplace conditions warrant an inspection.

Periodic inspections consist of identification and evaluation of workplace hazards utilizing applicable sections of the attached Hazard Assessment Checklist and any other effective methods to identify and evaluate workplace hazards.

## Accident/Exposure Investigations

Investigation of workplace accidents, hazardous substance exposures, and near-accident (near miss) will be done by \_\_\_\_\_ (Insert program management or site supervision).

Procedures for investigating workplace accidents and hazardous substance exposures include:

- Visiting the accident scene as soon as possible;
- Interviewing injured employees and witnesses;
- Examining the workplace for factors associated with the accident/exposure/near miss;
- Determining the cause of the accident/exposure/near miss;
- Taking corrective action to prevent the accident/exposure/near miss from reoccurring;
- Upon employee report of a chemical exposure or whenever there is a suspected employee chemical exposure, employees will be sent for evaluation and possible testing as deemed necessary by medical professionals.
- After an accident or injury if there is reasonable just cause the company will request the employee undergo a drug test; and
- Recording the findings and corrective actions taken.



## Hazard Correction

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the following procedures:

- When observed or discovered;
- When an imminent hazard exists, which cannot be immediately abated without endangering employee(s) and/or property, all exposed employees will be removed from the area except those necessary to correct the existing condition. Employees necessary to correct the hazardous condition shall be provided with the necessary protection; and
- All such actions taken and dates they are completed shall be documented on the appropriate forms: \_\_\_\_\_ (List form used).

## Training and Instruction

All employees, including managers and supervisors, and lead personnel shall have training and instruction on general and job-specific safety and health practices. Training and instruction shall be provided as follows:

- When the IIP Program is first established;
- To all new employees;
- To all employees given new job assignments for which training has not previously provided;
- Whenever new substances, processes, procedures or equipment are introduced to the workplace and represent a new hazard;
- Whenever the company is made aware of a new or previously unrecognized hazard;
- To supervisors to familiarize them with the safety and health hazards to which workers under their immediate direction and control may be exposed; and
- To all employees with respect to hazards specific to each employee's job assignment.
- Training on workplace safety and health practices for all industries include, but are not limited to, the following:
  - Explanation of the company's IIP Program, emergency action plan and fire prevention plan, and measures for reporting any unsafe conditions, work practices, injuries and when additional instruction is needed.
  - Availability of toilet, handwashing and drinking water facilities/availability, and the site Heat Illness Prevention Plan (HIPP).
  - Provisions for medical services and first aid including emergency procedures.
  - Use of appropriate clothing, including gloves, footwear, and personal protective equipment where appropriate.
  - Information about chemical hazards to which employees could be exposed and other hazard communication program information.
  - Information on newly identified Pandemic precautions and procedures (See Appendix A)

In addition, we provide specific instructions to all workers regarding hazards unique to their job assignment, to the extent that such information was not already covered in other training.



All employees shall be compensated for any and all training and instruction regarding this policy.

## List of Training Subjects

Training of our workers may include some of the following subjects based on scope of work performed:

- The company's safety policies and procedures.
- Confined spaces.
- Safe practices for operating any agricultural equipment or any site assigned equipment
- Safe procedures for cleaning, repairing, servicing and adjusting equipment and machinery.
- Safe access to working areas.
- Protection from falls.
- Electrical hazards.
- Proper use of powered tools.
- Lock-out/tag-out procedures.
- Materials handling.
- Fall protection from elevated locations.
- Driver safety.
- Slips, falls, and back injuries.
- Ergonomic hazards, including proper lifting techniques
- Personal protective equipment.
- Respiratory Equipment.
- Hazardous chemical exposures.
- Hazard communication.
- Physical hazards, such as noise, ionizing and non-ionizing radiation, cold stress, and heat stress (Heat Illness Prevention Plan)
- Bloodborne pathogens and other biological hazards.
- Proper lifting techniques.
- Proper food and beverage storage to prevent them from becoming contaminated.
- Good housekeeping, e.g. keeping stairways, doorways, isles, fire extinguishing equipment, and electrical panels clear, work areas neat and orderly, and promptly cleaning up spills.
- Prohibiting horseplay, scuffling or other acts that adversely influence safety
- Other job-specific hazards, such as:

(Insert site specific hazards, not listed above)

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## Recordkeeping - Written IIPP and Documentation Requirements

We have taken the following steps to implement and maintain our IIPP:

- Records of scheduled and periodic hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment checklist and correction form; and
- Documentation of safety and health training for each worker, including the worker's name or other identifier, training dates, type(s) of training, and training providers are recorded on a worker training and instruction form.

Inspection records and training documentation will be maintained according to the following checked schedule:

- Inspections and corrective actions taken for a minimum of one year  
***Training: same as personnel file retentions***

## Appendix A

Whenever a newly identified infectious disease/pandemic is identified, e.g. the Covid-19 Coronavirus, the following guidelines will be implemented to protect employees from Aerosol Transmissible Diseases (ATD):

- Sick employees will actively be encouraged to stay home.
- Any employees who have medical symptoms as described by the CDC for the infectious disease/pandemic will immediately be sent home and/or advised to seek medical care as needed. Indicate CDC medical symptoms for the virus/pandemic below:  
e.g.: Covid-19 Symptoms are but not limited to fever or chills, cough, shortness of breath or difficulty breathing, fatigue, muscle or body aches, headache, new or loss of taste or smell, sore throat, congestion or runny nose, nausea or vomiting and/or diarrhea.  

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- Employees who are out ill with medical symptoms will not be permitted to return to work until both of the following occur:
  - » At least three full days have passed with no symptoms (without the use of medications) and no acute virus symptoms; and
  - » At least the recommended number of days have passed per the CDC guidelines or designated Paragon guidelines since the symptoms first appeared.
- Employees who return to work following an illness must promptly report any recurrence of symptoms.
- Whenever possible, Paragon management will make efforts to allow employees to telework from home.

- All employees must practice physical distancing by cancelling in-person meetings, using video or telephonic meetings, and maintaining a distance of at least 6 feet between persons at the workplace when possible.
- When employees may be in workplaces with other persons, employees will be provided with a cloth face covering.  
(Note: Cloth face coverings are not personal protective equipment (PPE), but combined with physical distancing of at least six feet, they may help prevent infected persons without symptoms from unknowingly spreading a virus, e.g. Covid-19.)
- Employees are to avoid shared workspaces (desks, offices, and cubicles) and work items (phones, computers, other work tools, and equipment) when possible. If workplaces must be shared, the shared workspaces and work items are to be cleaned and disinfected before and after use.
- Paragon will establish and implement procedures to routinely clean and disinfect commonly touched objects and surfaces such as elevator buttons, handrails, copy machines, faucets, and doorknobs. Surfaces are to be cleaned with soap and water prior to disinfection. These procedures should include:
  - » Using disinfectants that are EPA-approved for use against the virus that causes the infectious disease, e.g. Covid-19.
  - » Providing EPA-registered disposable wipes for employees to wipe down commonly used surfaces before use.
  - » Following the manufacturer's instructions for all cleaning and disinfection products (e.g., safety requirements, PPE, concentration, contact time).
  - » Ensuring there are adequate supplies to support cleaning and disinfection practices.
- If an employee is confirmed to have an infection, e.g. Covid-19, Paragon will:
  - » Inform employees that worked at the same facility with the employee of their possible exposure to the virus in the workplace but maintain confidentiality as required by the Americans with Disabilities Act (ADA).
  - » Temporarily close the general area where the infected employee worked until cleaning is completed.
  - » Conduct deep cleaning of the entire general area where the infected employee worked and may have been, including breakrooms, restrooms and travel areas, with a cleaning agent approved for use by the EPA against the virus. It should ideally be performed by a professional cleaning service.
    - Any person cleaning the area will be equipped with the proper PPE for the virus disinfection (disposable gown, gloves, eye protection, mask, or respirator if required) in addition to PPE required for cleaning products. See below for further information on PPE.
- Advise employees to avoid non-essential travel if possible and check the Paragon travel advisories and CDC's Traveler's Health Notices prior to travel.

To protect employees with frequent contact with the public, Paragon will arrange work and implement measures that may account for possible public contamination, including:

- Conducting even more frequent cleaning and disinfection of surfaces touched by the public, e.g. credit card machines, touch screens, shopping carts and doors.

- Protecting workers who have frequent interaction with the public with engineering controls such as Plexiglas screens or other physical barriers, or spatial barriers of at least six feet, if feasible, and to practice social distancing in the workplace as work duties permit.
- If exposures to the general public cannot be eliminated with engineering controls, employees are required to wear face coverings whenever in the facility when recommended by CDC and Paragon procedures.
- Scheduling work to allow frequent hand washing by employees handling items (i.e. pens, pencils, phones, clipboards, sign-in logs, reusable name tag holders, etc.) touched by members of the public.
- Enforcing physical distancing by limiting the number of individuals in the spaces where there is a potential that groups of individuals may have to wait for approval for entry or escort e.g. lobbies.
- Asking individuals to take precautions and to only touch items as necessary and provide hand sanitizer stations for individuals to use for cleaning the items after they are done.
- Providing workers that may have to handle items touched by the public with PPE, e.g. disposable gloves and/or disinfecting products.

## Provide Employee Training

Paragon shall provide training in a language that is readily understandable by all employees on the following topics:

- General description of the pandemic virus, it's symptoms, when to seek medical attention, how to prevent its spread, and the designated procedures for preventing its spread at the workplace and including quarantine periods and return to work procedures.
- How an infected person can spread of the virus to others even if they are not sick.
- How to prevent the spread of the virus with the use of cloth face covers, disposable face masks, or respiratory protection to prevent the spread of the virus based on up-to-date released guidance from the CDC including:
  - » Encouraging that everyone should use cloth face covers or disposable face masks, or when required respiratory protection, when around other persons.
  - » How face covers can help protect persons around the user when combined with physical distancing and frequent hand washing.
  - » Information that cloth face covers are not protective equipment and do not protect the person wearing a cloth face cover from the virus.
  - » Instructions on washing and sanitizing hands before and after using face coverings and/or gloves, including proper donning and removal of the masks or gloves which should be washed or disposed of after each shift or more frequently if designated by procedural policies.
- The use of a cough and sneeze etiquette.
- Washing hands with soap and water for at least 20 seconds, after interacting with other persons and after contacting shared surfaces or objects.
- Avoiding touching eyes, nose, and mouth with unwashed hands.
- Avoiding sharing personal items with co-workers, e.g. headsets or objects used near the face
- Providing tissues, no-touch disposal trash cans and hand sanitizer for use by employees.

- The safe use of cleaners and disinfectants, which includes:
  - » The hazards of the cleaners and disinfectants used at the worksite.
  - » Wearing PPE (such as gloves) based on designated role & responsibilities.
  - » Ensuring cleaners and disinfectants are used in a manner that does not endanger employees.

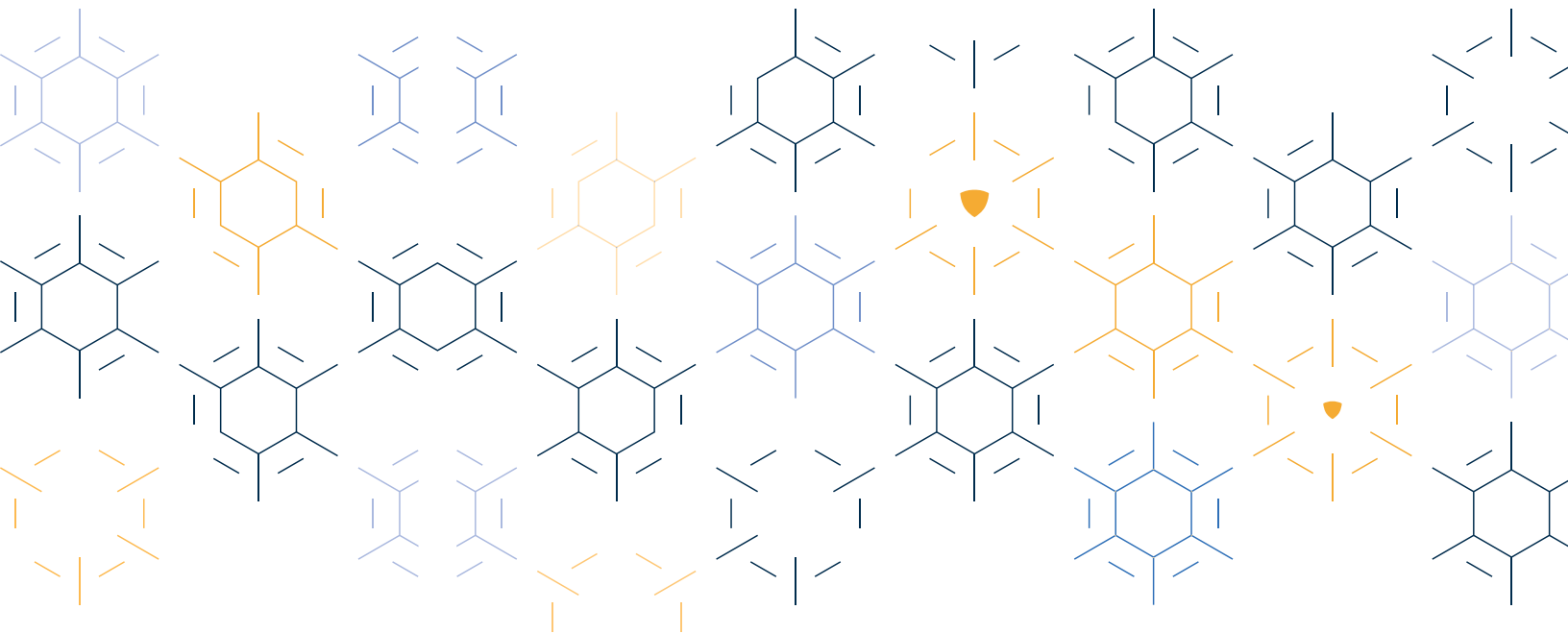
(Note: For Covid-19 training on the above listed items, please see the “Covic-19 Prevention Training” document provided to all employees)

## Washing Facilities

Regardless of the virus risk, washing facilities will be provided that have an adequate supply of suitable cleansing agents, water and/or approved disinfecting solutions/gels, and single-use towels or blowers.

## Personal Protective Equipment (PPE)

Hazard assessments will be conducted to determine if any PPE is needed to protect employees from hazards that are present or are likely to be present in the workplace, including health hazards based on the assigned roles and responsibilities employees are contractually required to conduct. Employees will be provided with a selection of properly fitting and sanitary PPE that will effectively protect them against these hazards. Supervision must also ensure the appropriate PPE is provided to and used by employees who use cleaners and disinfectants.



# 2A INJURY ILLNESS PREVENTION PLAN TRAINING ACKNOWLEDGEMENT

## PARAGON

I acknowledge that I have received information and training on the Injury Illness Prevention Plan as required per Federal OSHA Regulations CFR 1910.132(d), CFR 1910.141 and CFR 1910.151, and Cal OSHA Title 8 Regulations, CCR 3203, CCR 1509, CCR 1938, and CCR 5199.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name:

cc: Personnel File



## SECTION 3

# Hazard Communication Program/ Global Harmonization System



# Hazard Communication Program/Global Harmonization System

## Introduction

Paragon has developed this Hazard Communication Program based on the Global Harmonization System to enhance our employee's safety and health. It will apply at those sites where our employees handle or are potentially exposed to hazardous materials.

The OSHA Hazard Communication Standard (1910.1200) issued in 1994 was updated In May of 2012 to align with the UN Global Harmonization System of Classification and Labeling of Chemicals (GHS), and is designed to protect all workers in the United States who have exposure or are exposed to hazardous substances at their work sites. Per OSHA, "Exposure or exposed means that an employee is subjected in the course of employment to a chemical that is a physical or health hazard, and includes potential (e.g. accidental or possible) exposure."

Paragon's Standard Industrial Classification (SIC) Code is 7381, Detective, Security Guard and Armored Car Services, and would not generally be considered as not being typically exposed to hazards as a course of normal duties, but because a great majority of our clients are manufacturing or industrial plants, our Security Officers (S/O's) could be exposed to the dangers of hazardous or toxic chemicals, materials, or physical hazards as a large portion of our employees must walk through and observe operations and facilities in which a "potential exposure" exists.

Therefore per the OSHA Standard compliance a number of specified requirements is necessary. However, these requirements should apply only if Security Officers are regularly or potentially exposed to hazardous materials.

As a company, Paragon intends to provide information about chemical hazards and other hazardous substances, and the control of hazards via our comprehensive Hazard Communication Program, which includes the following:

- Responsibilities for administering the program
- Container labeling with the GHS Pictograms
- Safety Data Sheets (SDS)
  - » Where located
  - » What type of information is provided in SDS 16 Section format
  - » Signal Words (Danger and Warning)
  - » Description of Pictograms
  - » Hazard Statements
  - » Precautionary statements
- Inventory of hazardous substances
- Hazardous non-routine tasks
- Informing contractors about the program
- On-site training established for specific client-site environment

## Responsibilities

### Hazard Communication Coordinator (HCC)

(Applies only at client sites where employees handle hazardous materials)

- Ensure the program is organized, written, distributed and maintained
- Ensure master inventory and SDS' are available and current
- Ensure SDS' are distributed when requested
- Provide technical assistance to Managers and employees when questions arise about elements of the program

### Program Managers

- Maintain the Hazard Communication Program and update items as they are distributed by the HCC
- Provide training to all employees initially and/or when hired, when a new product is introduced and periodically (at least annually) for refresher
- Provide the program information such as a copy of the regulation and Safety Data Sheets for employee review when they request it
- Ensure employees are complying with requirements for the use of personal protective equipment (where needed) and that labels on products are properly maintained
- Maintain training records on all employees for compliance and reference
- Establish disciplinary guidelines for failure of managers and employees to present and follow the information requirements outlined in the program

### Container Labeling

It is the policy that no container of hazardous substances will be released for use until the following minimum label information is verified:

- Containers are clearly labeled as to the contents
- Appropriate hazard classifications are noted
- Appropriate labels with signal words, pictograms, hazard statements and precautionary statements are noted
- The name and address of the manufacturer is listed
- At client sites, container labeling is the responsibility of the client. However, if your employees have access to containers, the site supervisor should check those containers periodically to ensure that our employees are aware of the hazards of the materials used in their work areas

Unlabeled containers should be reported via the proper "Incident/Hazard Report".

## Safety Data Sheets (SDS)

Copies of SDS for all hazardous substances on property to which employees may be exposed are to either be kept at the client facility provided access to the SDS' is available 24 hours per day by hard copy or electronically so that the Officers do not need to leave the site to obtain information regarding materials on site. If provided electronically provisions for power backup during outages or backup hard copies are to be in place.

The Program Manager/HCC (at client site) will review incoming data sheets for new and significant health/safety information and will see that any new information is passed on to the affected employees.

SDS' will be reviewed for completeness by the Program Manager/HCC. If an SDS is missing or obviously incomplete, a new SDS will be requested from the manufacturer or distributor by the site's HCC. The nearest OSHA office will be notified if the manufacturer or distributor refuses to provide a SDS.

SDS' are to be available to all employees for their work areas for review during each work shift. If SDS' are not available or new hazardous substance(s) in use do not have an SDS, please contact the Program Manager/HCC immediately for the information.

## Employee Information and Training

All employees are to be given training on the Hazardous Communication/GHS Standard upon hire. Training will include a review of the standard. Who is responsible for obtaining/maintaining the SDS's, how to read and find information on the SDS, and what information is included in the following 16 sections of the SDS:

- **Section 1:** Identification includes product identifier; manufacturer or distributor name, address, phone number; emergency phone number; recommended use; restrictions on use
- **Section 2:** Hazard(s) identification and warning information, including hazard classification, signal words, hazard statements, pictograms, precautionary statements, mixture information and required label elements
- **Section 3:** Composition/information on ingredients includes information on chemical ingredients; trade secret claims
- **Section 4:** First-aid measures includes important symptoms/ effects by relevant routes of exposure (inhalation, skin & eye contact, and ingestion), acute, delayed; required medical care and special treatment
- **Section 5:** Firefighting measures lists suitable extinguishing techniques, equipment; chemical hazards from fire, and recommendations for precautions and PPE to be worn by firefighters
- **Section 6:** Accidental release measures lists emergency procedures; protective equipment; proper methods of containment and cleanup
- **Section 7:** Handling and storage list precautions for safe handling and storage, including incompatibilities, general hygiene practices (e.g. prohibited eating, drinking and smoking in work areas), and ventilation requirements
- **Section 8:** Exposure controls/personal protection lists; OSHA's Permissible Exposure Limits (PELs); Threshold Limit Values (TLVs); appropriate engineering controls; Personal Protective Equipment (PPE) types to prevent exposure to eye, face, skin or respiratory protection to be worn based on hazards and potential exposure

- **Section 9:** Physical and chemical properties listing the chemical's characteristics (appearance, flammable and explosive limits, odor & odor threshold, vapor pressure & density, relative density, melting & freezing point, solubility, boiling point, flash point, auto-ignition temperature, evaporation rate, decomposition temperature, flammability as solid or gas, and viscosity)
- **Section 10:** Stability and reactivity lists, chemical stability, and possibility of hazardous reactions
- **Section 11:** Toxicological/health effect information includes routes of exposure; related symptoms, acute and chronic effects; numerical measures of toxicity
- **Section 12:** Ecological information\*
- **Section 13:** Disposal considerations\*
- **Section 14:** Transport information\*
- **Section 15:** Regulatory information\*
- **Section 16:** Other information, includes the date of preparation or last revision

\*Note: Since other Agencies regulate this information, OSHA will not be enforcing Sections 12 through 15 per 29 CFR 1910.1200(g)(2).

When an employee is assigned to any facility where hazardous materials are being either manufactured or handled, employees are to attend a site health and safety orientation session conducted by their Manager/Supervisor prior to starting work at the facility to receive information and training on the following:

- An overview of the requirements contained in the Hazard Communication Regulation, including their rights under the Regulation
- Inform employees of any operations where hazardous substances are present
- Location and availability of the site's written Hazard Communication Program and SDS'
- Physical and health effects of the hazardous substances and routes of entry into the human body (inhalation, ingestion, absorption, and injection)
- Methods and observation techniques used to determine the presence or release of hazardous substances in the work area
- How to lessen or prevent exposure to these hazardous substances through usage of engineering controls, work practices, and/or the use of personal protective equipment
- Steps have been taken to lessen or prevent exposure to these substances
- Emergency and first aid procedures to follow if employees are exposed to hazardous substance(s) or whenever spills occur
- How to read labels and review SDS' to obtain appropriate hazard information
- That all labels and other forms of warning are not to be defaced or removed at any time

*Note: It is critically important that all of our employees understand the training. Per the regulation this program shall address methods of communicating hazard communications to non-English speaking employees by presenting it in their native language. Although some employees may be bi-lingual, as writing, reading, and speaking of English is a requirement for all employees working for Paragon, this program shall be given in English. If you have any additional questions, please contact your Manager.*

When new hazardous substances are introduced, Managers/Supervisors will review the above items as they are related to the new materials in your work area.

## List of Hazardous Substances

The list of all known hazardous substances used in the workplace is to be inserted in the Appendices of this section. Specific information on each noted hazardous substance(s) can be obtained by reviewing the Safety Data Sheets specific to each client site or program office.

## Hazardous Non-Routine Tasks

A hazardous non-routine task is defined as a task where hazards may be present from hazardous substances, and the task is not performed regularly as part of normal operations (i.e. performed once or twice a year.)

Generally, employees are not required to perform hazardous non-routine tasks, but should any tasks ever occur, then prior to starting work on such projects, each affected employee will be given information by their Manager about hazards to which they may be exposed during such an activity. This information will include:

- Specific hazards inherent to the task(s) to be performed
- Procedures that must be followed
- Protective/safety measures that must be utilized and PPE to be worn
- Measures will take to reduce the hazards including ventilation, respirators, presence of another employee(s)
- Emergency procedures to be followed

## Hazardous Substances in Un-labeled Processes

Currently at Paragon, we have no processes containing hazardous substances but, should operations ever change, which necessitate unlabeled process hazards, then Managers are to ensure that employees who work on unlabeled processes (pipes, tanks, chambers) are informed as to the hazardous substances contained within by instituting the following policy:

Prior to starting work on unlabeled processes, our employees are to contact their Manager for the following information:

- The hazardous substance in the pipe, vessel, tank or process equipment
- Potential hazards
- Safety precautions which shall be taken and PPE to be worn
- Procedures that must be followed
- Emergency procedures to be followed

If you are working in an area at a client's facility where they are working on processes containing hazardous materials, you should inquire about the hazards and appropriate precautions that are to be taken by employees.

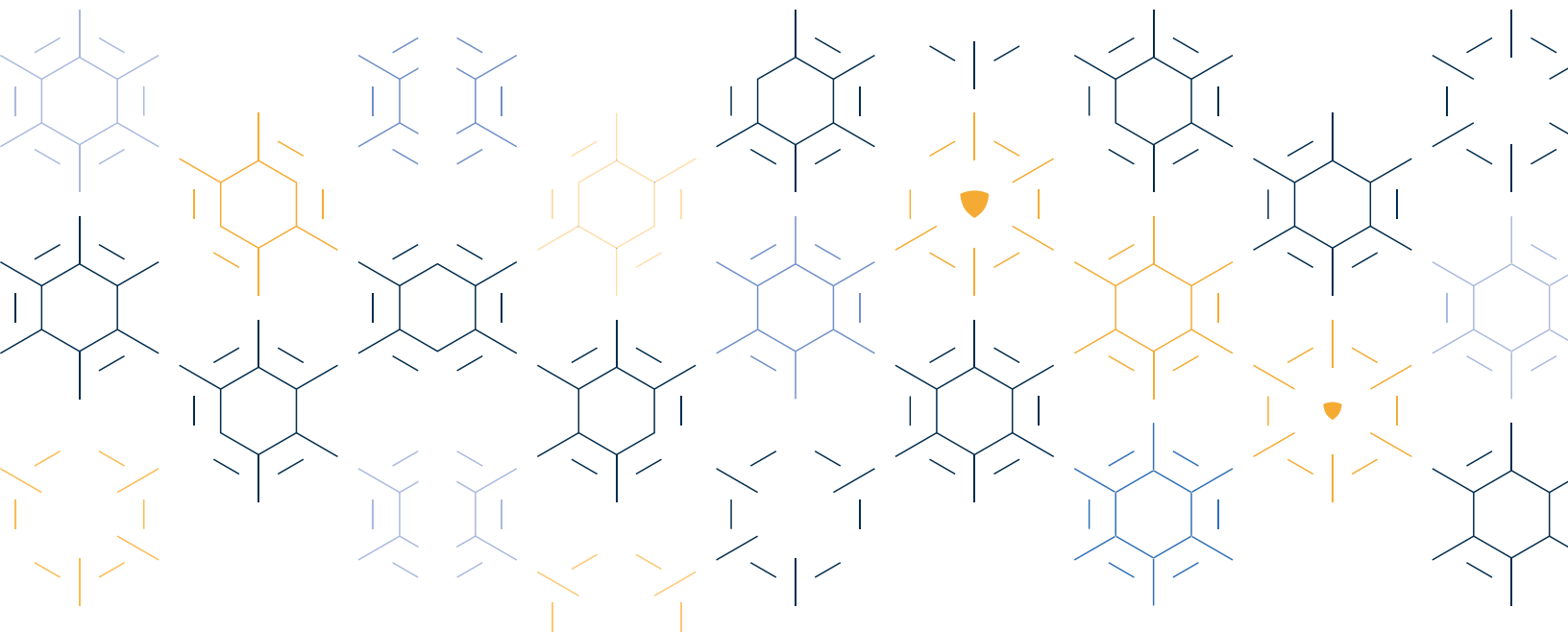
## Informing Contractors

To ensure that outside contractors work safely in our facilities, it is the responsibility of the Program Managers to provide contractors with the following information:

- Hazardous substances to which they may be exposed while on the job
- Precautions the employees may take to reduce the possibility of exposure by the usage of appropriate protective measures
- Location of our Hazard Communication Program

Prior to contractors performing work, a determination must be made regarding the hazardous chemicals or substances that contractors might bring into the work environment. SDS' must be provided by the contractor for those substances and our employees must be notified.

Our clients are responsible for providing contractors with the same information. A copy of the client's Hazard Communication Program must be obtained, and made part of the Post Orders.



## 3A HAZARD COMMUNICATION GHS TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received training regarding the Hazardous Communication/Global Harmonization System of Classification and Labeling of Chemicals, including how to obtain information from Safety Data Sheets (SDS), the Pictograms and hazard statements used to identify the hazards of materials used in the work place, and understand how to use of the SDS to get information of material hazards, exposure controls and what PPE is to be used as required per Federal OSHA Regulations 29 CFR 1910.1200 and Cal OSHA Title 8 Regulations CCR 5194 and CCR 5189.

I have viewed and understand the video HAZCOM In Sync with GHS, have completed an examination on HAZCOM In Sync with GHS, and reviewed the results with my instructor.

---

Employee Name (Print)

---

Date

---

Employee Signature

---

Instructor/Trainer Name:

cc: Personnel File





## SECTION 4

# Hazard Identification and Assessment

# Hazard Identification and Assessment

## Introduction

An employer's obligation under OSHA and state laws is to provide a safe place to work for its employees. Paragon's responsibility is complicated because employees work on sites that are not owned and /or maintained by the company.

Attention to the work environment should begin with the first evaluation of a potential client.

In order to obtain knowledge of the situations employees would be placed in, the site safety inspection checklists should be used as a guide for the inspections and evaluations. These can be found in the Job Hazard Analysis and Periodic Hazard Assessments sections of the Safety Manual.

The site safety inspection should be completed prior to the assumption of duties at the client facility, or within a reasonable timeframe should the work begin as the result of emergency services. Due to the possibility of changing conditions or scope of services being provided, **a site safety inspection should be completed at minimum of once per calendar year, and/or whenever there is a material change to the scope of work.**

The importance of physical site safety inspections and hazard identification is self-evident. The Security Officer's manual specifies that each daily activity report list safety or fire hazards to which the Officers may be exposed to, and any unusual incidents or accidents during the Officer's shift be reported using an Incident / Investigation Report.

Careful reporting of safety hazards is only the first step; in order to be effective, the client must be contacted about the hazard. As the workplace is shared, Paragon's primary responsibility to employees requires that the client is to be alerted to hazards.

In addition to this, a physical hazards survey, and an overview of the client's safety program should be of vital interest. The presence of a safety policy statement signed by an authorized representative of the client, written safety rules, a written and practiced emergency and disaster plan, proper accident investigation, and frequent safety inspections will indicate a client who takes an active interest in providing a safe workplace for employees.

In rare instances where a client refuses to correct an unsafe condition, the condition should be documented in a letter to the client. Problems with client compliance should be discussed at the safety management committee meetings, and escalated when applicable to the next level of management and supervision in order to achieve resolution and abatement of the hazard. If the unsafe conditions are significant with the very likely potential for Officer injury, it may be necessary to notify the client that assigned duties in the area where the hazard exists will be curtailed until the hazard has been removed.

Our Program consists of the following hazard recognition techniques and elements:

- Review of Incident Reports
- Employee Safety Suggestion Form
- Discussion of hazards at local Safety Management Committee Meetings

- Company sponsored safety inspections
- Conducting post-accident/incident investigations

The control techniques and elements of our Program include:

- Implementing accident investigation control strategies
- Follow-up on Incident Report and Safety Suggestion Forms submitted by employees
- Follow-up actions on items discussed at the Safety Meetings
- Reviews of inspection/audit reports and implementation of recommended controls provided in the reports
- Correction of daily observed hazards

## Responsibilities

It is the responsibility of every employee assigned to a site location and at the District Office to maintain a safe working environment. The following are the responsibilities that apply to specific personnel:

### Reporting Hazards at Client Sites

- **Program Manager or Account Manager:**

The Program Manager or Account Manager has the responsibility to check with the client contact, prior to assignment of personnel, to determine if any current or potential hazards have been identified on the site. The Account Manager will then evaluate the job by conducting a Site Hazard Analysis and make any recommendations to the client for corrective measures. If the hazard poses a risk of imminent harm, personnel will not be assigned to the hazardous area until the hazardous condition is corrected.

When setting up the site Injury Illness Prevention Plan and Post Orders, the Account Manager or Program Manager must ensure that all necessary information on health and safety is included so our employees will be working at a safe place of employment. Again, information about the client's safety program, policies and procedures will help identify any potential hazards that our employees may be exposed to.

- **Site Supervisor & Security Officer:**

It is the responsibility of the Site Supervisor and Security Officers assigned to the specific site to identify potential safety hazards. As part of the new employee orientation, within 30 days of hire, Security Officers are to receive training on site specific hazards, what PPE is required to be worn, how to identify and report workplace hazards, and how to use the Security Officer Safety Inspection Checklist to perform workplace evaluations while performing patrols throughout the site. If hazards are identified, then the appropriate hazard forms, "INCIDENT / HAZARD REPORT" and/or "CONDITION REPORT" must be completed and passed along to the proper personnel. Based on the hazard(s) identified, a determination is to be made by the Account Managers and Supervisors regarding if it is a "high risk" of seriousness for officer safety and whether or not work is to be curtailed in the area until the hazard can be eliminated, whether it is a "medium risk" for officer safety and officers will be allowed to work in the area with special safety precautions being put in place until the hazard is eliminated, or if it is a "low risk" for officer safety that does not pose a risk as officers can be instructed to avoid the area. In most cases an Incident Report/Hazard

Report or Condition Report will be completed and submitted to our client requesting that corrective action be taken to eliminate the noted hazard(s). A copy of these reports is to be retained for our client record and for review by the local Safety Management Committee who will review the report and track resolution/removal of the hazard(s) noted.

## Reporting Hazards at the Field Offices

- **District Director:**

The District Director has the responsibility to inspect the field office area and review policies with regard to any current or potential hazards that have been identified. The District Director will then evaluate the hazard(s) and make any written recommendations to Regional or Corporate Management for corrective measures that must be taken to create a safer place of employment.

- **District Employees:**

It is the responsibility of all District Employees to report any safety hazards. If hazards are identified, then the proper "INCIDENT/HAZARD REPORT" and/or "CONDITION REPORT" must be completed and forwarded to the District Director and Safety Management Committee for corrective action. A copy of these reports along with the recommended corrective actions will be retained in our client records until hazards have been corrected and for a period of one (1) year.

## Reporting Hazards at Corporate Offices

- **Employees:**

When you see or receive information relating to unsafe acts, conditions, or incidents, the following procedures should be used as a guide:

- » The first person who sees the problem should correct minor problems and their causes where possible to prevent an accident to someone else
- » Notify your Supervisor of the problem and whether the condition has been corrected or if additional measures are needed
- » Document findings and any actions taken on the DAR

*NOTE: There may be a delay between ordering the correction and final correction being completed. Take appropriate precautions, such as warning employees and customers, posting signs, roping off areas, etc., and making sure all Officers on the shift and all additional shifts are informed of the safety hazard and status of hazard removal.*

- » Fill out an INCIDENT/HAZARD REPORT & EMPLOYEE SAFETY SUGGESTIONS form to report a safety hazard or incident and forward to your manager.

- **Department Head:**

Take remedial action to prevent recurrence of incidents or to eliminate observed hazards. It often takes several follow-up checks to ensure the condition has been corrected. Make a note to follow-up with the client on a scheduled basis regarding the status of corrective actions that are to be or are being taken.

Follow-up with employees on actions taken, document the incident, and retain forms and follow up actions in a file for a period of at least one (1) year.

Review outcomes of incidents and inspections at the Safety Meetings.

Conduct regular in-house department/area inspections; submit report and follow-up on corrective actions.

Accompany regulatory and non-regulatory agencies and consultants on inspections/audits and take notes.

Submit a written response to the Corporate Safety Officer on regulatory/non-regulatory inspection results and recommendations. The response must clearly indicate the department's / area's position with regard to each specific recommendation, cost factors and time estimates to comply or institute control measures.

Ensure that safety policies, compliance procedures, and inspection report recommendations and evaluations are issued and followed to prevent recurrence of the same hazards.

- **Director, Risk Management:**

Provide assistance, as deemed necessary, regarding compliance and liaison for inspections/audits conducted by non-regulatory and regulatory personnel at locations.

Follow up on any citations received by regulatory agencies to ensure compliance with regulations.

- **Employee Safety Suggestions:**

All employees are encouraged to complete and submit "EMPLOYEE SAFETY SUGGESTION" forms to the Safety Management Committee. The suggestions will be reviewed by the Safety Management Committee and acknowledged verbally or in writing. Their suggestions will provide the company with feedback on the effectiveness of the Injury Illness Prevention Plan. The suggestion can accompany the Incident/Hazard and Condition Report." If a suggestion is submitted separately, a "Condition Report," if warranted, will be completed by the Safety Management Committee and forwarded to the attention of the Site Supervisor or District Director for delivery to the client. The report will go to the District Director if it is a District Office safety suggestion.

## **Periodic Inspections and Correcting Deficiencies**

### **At Client Sites:**

As management's representatives in the field; District Directors, Account Managers and Supervisors must enforce all safety rules and assist the client in enforcing their safety rules and regulations.

- Account Managers and Supervisors will conduct periodic site inspections to ensure that a safe work environment is maintained at the location. If during a site inspection, new safety hazards or potential safety hazards are identified, then the proper hazard reports must be completed and submitted to the client representative for corrective action.
- The Account Managers and Supervisors will also notify all site personnel of the hazards identified with specific instructions to avoid the identified hazards until corrective action has been taken by the client.
- After submission of the Incident Hazard Report or Condition Report to the client representative, the Account Manager/ Supervisor will calendar the event for a follow up inspection to ensure the noted hazard has been corrected.
- If the hazard has not been corrected, then the Account Manager / Supervisor needs to follow up with the client as to why the hazard has not been corrected and if necessary, remove our employees from the specific hazard area until corrective action has been taken by the client.

- If a hazard which could cause imminent risk of injury or death is discovered, the area should be evacuated and the client's Emergency Response Team and Fire Department notified immediately.

The Safety Management Committee will be given periodic reports regarding the status and resolution of hazards. The Safety Management Committee may request status reports from the Account Manager/ Supervisor at any time.

### **At the District Offices:**

The District Director with the assistance of the Safety Committee will conduct periodic office inspections to ensure that a safe work environment is maintained at this location.

- If during a site inspection, new safety hazards or potential safety hazards are identified, then the proper hazard reports will be completed and submitted to the District Director for corrective action.
- A copy of the reports will be forwarded to the Regional Management for follow-up.
- The District Director will also notify all district personnel of the hazards identified with specific instructions to avoid the identified hazards until corrective action has been taken by the District Director.
- The District Director will calendar the event for a follow up inspection to ensure that the noted hazard has been corrected.
- The Regional Management will follow up with the District Director as to why the hazard has not been corrected and if necessary, make recommendations to the Regional Management that the employees be removed from the specific hazard area until corrective action has been taken.
- The Regional Management will review the recommendations and, if necessary, remove the employees from the specific hazard area until corrective action has been taken.
- If a hazard could cause imminent risk of injury or death, the area will be evacuated and local authorities notified immediately.
- The Safety Management Committees will obtain reports by all parties regarding the resolution of hazards. The Safety Management Committees may request status reports at any time.







## SECTION 5

# Workplace Inspections



# Workplace Inspections

## Introduction

A workplace inspection is a critical part of a comprehensive safety and health program in which the workplace is examined closely on a regular basis for the purpose of:

- Identifying and recording potential and actual hazards associated with buildings, equipment, environment, processes, and practice
- Identifying any hazards which require immediate attention, whether they are unsafe conditions or unsafe acts
- Ensuring that existing hazard controls are functioning adequately; and where appropriate, recommending corrective action

Within any safety program, a variety of types of inspections may be needed, for example:

- Startup of new client facilities.
- Spot inspections may be undertaken on a random basis as part of general safety responsibilities
- Pre-operation checks of special equipment, work processes, or patrol routes are often necessary before work is carried out;
- Critical inspections are regular planned inspections of those areas which have a high potential for serious accidents
- Regular planned inspections (Annual or Semi-annual) are done on a regular basis in a defined workplace and cover all conditions including work practices and procedures

Start up and regular planned inspections are the subject of this section. However, the principles which apply to this type of inspection can easily be adapted to other types of inspections.

The purpose and function of workplace inspections must be seen within the context of the whole safety and health program. It is not an isolated function, but relates to the major objectives of the program, namely:

- To identify hazards (unsafe conditions and unsafe acts)
- To set standards and related procedures
- To establish and determine effectiveness of controls
- To monitor the effectiveness of plans, programs, policies and procedures

Effective inspections are used to assist and improve other elements of the safety program, as the inspections help to identify possible corrective action for any noted hazards; and to monitor the effectiveness of controls.

Inspections should not be treated as isolated events. To be effective they must be conducted on a regular basis and be part of a systematic program aimed at accident prevention.

The four steps involved in establishing a sound workplace inspection system are:

- Planning
- Inspection
- Reporting
- Monitoring

## **Planning**

The first step in preparing for effective inspections is planning. This involves considering and establishing appropriate safety plans, programs, policies and procedures.

As for any other element of the safety program, it is important that senior management show their commitment to the activity and to its objectives. This can be done by establishing and making known a policy related to the overall safety and health program. The following general points should be considered in developing it:

- Commitment of Senior Management
- The role of inspections in attaining overall workplace safety and health objectives
- Who is responsible and accountable for carrying out an effective inspection system
- What the company and employees must do to comply with the spirit and intent of the occupational safety and health legislation

If the inspection system is to be effective, it is critical that appropriate procedures are established. Such procedures should ensure that:

- The timing of inspections and the areas to be covered are defined
- It is clear who is to carry out inspections, consider recommendations, and take necessary corrective action
- The actual inspections are carried out by persons with suitable experience, training and knowledge of the workplace

## **Who Should Conduct Inspections?**

Regular inspections, at frequent intervals, should be performed by a Manager or Field Supervisor who is well trained and fully qualified to perform workplace safety inspections.

It can be very valuable to periodically supplement these inspections with inspections conducted by a team consisting of a representative of the client facility, a Supervisor, an employee familiar with the workplace being inspected, and a member of the employee safety and health committee.

When inspecting special equipment or processes, it may be useful to have an appropriate specialist on the inspection team.

Inspections should be performed during all work shifts.

## What Should Be Inspected?

No workplace can be considered entirely free from hazards. Therefore all workplaces within an establishment should be inspected. This would include offices, storage areas, and the maintenance areas. Also areas where work is not normally performed on a routine basis should be inspected, but as it may be necessary to access the area in an emergency.

When deciding how many separate inspections are necessary and what the timing and frequency of each inspection will be, the following should be considered:

- The number of different processes or operations and their scale, since different processes involving different machinery or employees may warrant separate inspections
- Certain hazardous equipment that requires inspections at set intervals
- Work processes with a high hazard potential may require separate and more frequent inspection
- Number of shifts (inspections should be conducted on every shift, since may vary from one shift to another)
- Special inspections are to be planned whenever a new process or piece of equipment is introduced into the workplace.

## Who Should Review Inspection Reports?

No matter how well conducted, inspections are worthwhile only if items raised are carefully considered and action is taken to correct identified hazards.

The level and types of persons given this responsibility will vary from one organization to another. The following should be kept in mind when allocating this responsibility:

- Analyzing inspection reports is a critical function for safety committees and representatives
- At least one person reviewing reports should have the authority necessary to take corrective action and to delegate as required
- Some issues may require the opinion of an expert such as a design engineer, an industrial hygienist, or safety professional.
- Follow-up action and feedback to those conducting inspections is an important factor
- Items discovered during an inspection which represent an imminent danger (one that is likely to cause death or serious injury) should be reported to the responsible Supervisor or Manager immediately, and corrective action should be taken at once.

The Manager should have the authority to suspend any work activities that expose workers to an imminent danger.

## Safety Plans, Programs, Policies, and Procedures

To set the tone for the inspection, the person(s) conducting an inspection should first review the company's and client's safety plans, programs, policies, and procedures.

If the safety plans, programs, policies, and procedures appear to be properly prepared, the remainder

of the inspection will consist primarily of determining whether or not the safety plans, programs, policies, and procedures are used/followed by employees.

If the safety plans, programs, policies, and procedures do not appear to be properly prepared, the remainder of the inspection will be conducted from the perspective that the company does not hold safety in high regard.

The extent to which anyone can carry out an effective inspection depends on his or her ability to identify hazards. This involves knowledge and understanding of:

- The understanding of working procedures
- The applicable safety standards, regulations, and requirements
- The range of potential hazards associated with the equipment used, the process, or the environment
- Previous accidents and problem areas

The following additional information may be needed in order to conduct an effective safety inspection:

- Facility layout
- Buildings
- Basic layout plans showing equipment used
- Information on possible hazardous substances used
- Legal requirements and standards
- OSHA standards
- Company rules/regulations
- Job procedures and safe working practices
- Personal Protective Equipment requirements
- Safety plans, programs, policies, and procedures
- Accident data
- Investigation reports
- First Aid cases
- Employee reports/complaints with regard to particular hazards in the workplace
- Recommendations made by safety committee members
- Results of previous inspections



## The Inspection

To ensure consistent and comprehensive coverage of all areas in the workplace, it is useful to develop checklists of all potential hazards. Such lists have to be continually reviewed and revised to reflect changes in equipment, processes, and accident records.

There are a series of sample inspection forms available. However, consideration should be given for editing these inspection forms and adding additional forms as necessary to make them site specific. It is important to remember that there may be unique hazards associated with various workplaces.

These inspection forms are to be used as a point of reference, but the health & safety inspection should not be limited to the items on the list. If other hazards are found, they should be dealt with as well. Always maintain the perspective of what is being looked for is “ANYTHING” that could result in the injury of a person or damage to equipment and/or facilities.

“Anything” includes things that may not be on the inspection forms and things that may not be covered by OSHA or other safety regulations. This will ensure that the inspection being conducted is comprehensive.

In conducting inspections the following basic principles bear consideration:

- While it is appropriate to ask questions, the person inspecting should not unnecessarily disrupt work activities unless necessary to prevent injury
- Attention must be drawn to the presence of any imminent danger. The Manager should have the authority to suspend any work activities that expose workers to an imminent danger.

## Reporting

If action is to be taken to control or eliminate hazards, management needs to be made aware of the problems in a concise, timely, and factual way. Good reports help to gain support from management for the findings of inspections. An inspection will be effective only if the results are promptly reported to the right persons and if prompt corrective action is taken where necessary.

It is therefore important to identify those persons to whom inspection reports should be sent and reviewed by.

## Monitoring

The information obtained from workplace inspections must be considered and used if inspections are to be a valid part of the safety and health program. For this to be achieved, it should be clear who has ultimate responsibility for making decisions on corrective actions.

The information obtained from regular inspections should be reviewed carefully to identify where immediate corrective action is needed and to determine appropriate abatement plans.

Failure to correct the hazards discovered during an inspection can result in severe civil penalties should an employee be injured by a hazard that was discovered but not corrected.

***Such failure to correct identified hazards can also result in OSHA citations for Willful Violations.***

Analysis of inspection reports over a period of time may:

- Highlight the need for training in certain areas;
- Provide insight as to why accidents are occurring in particular areas;
- Establish priorities for corrective action;
- Assist in establishing or improving safe work practices;
- Indicate areas, equipment, etc. which may require more in-depth hazard analysis

# 5A WORKPLACE HAZARD RISK ASSESSMENT FORM

Client Name: \_\_\_\_\_ Site Name: \_\_\_\_\_ Site Address: \_\_\_\_\_

Type of Assessment:

☐ Initial (Start-up Account) ☐ Periodic (6 month) ☐ Annual (Min) ☐ Post/Site New Hazard Identified ☐ Accident Investigation

Assessment of:

☐ Entire Facility ☐ Specific Bldg./Area ☐ Patrol Route ☐ Task

Assessment Completed By: \_\_\_\_\_ Date Completed: \_\_\_\_\_ Last Assessment Date: \_\_\_\_\_

*Instructions: Review the Index and identify all applicable hazards and risks for the facility where the assessment is being conducted. Then check off the appropriate categories and use the index to find the specific items that have been checked off. Items that are not checked off do not need to be evaluated unless additional hazards are discovered while conducting the assessment.*

## INDEX

General Site Assessment		
Application Hazard?		
<input type="checkbox"/> Y <input type="checkbox"/> N	Injury Illness Prevention Plan	
<input type="checkbox"/> Y <input type="checkbox"/> N	Officer Designated Posts	
<input type="checkbox"/> Y <input type="checkbox"/> N	Restrooms	
<input type="checkbox"/> Y <input type="checkbox"/> N	Portable Restrooms	
<input type="checkbox"/> Y <input type="checkbox"/> N	Interior Lighting	
<input type="checkbox"/> Y <input type="checkbox"/> N	Exterior Lighting	
<input type="checkbox"/> Y <input type="checkbox"/> N	Exits and Egress Routes	
<input type="checkbox"/> Y <input type="checkbox"/> N	Interior Walkways	
<input type="checkbox"/> Y <input type="checkbox"/> N	Exterior Walkways	
<input type="checkbox"/> Y <input type="checkbox"/> N	Patrol Routes	
<input type="checkbox"/> Y <input type="checkbox"/> N	Stairs and Stairways	
<input type="checkbox"/> Y <input type="checkbox"/> N	Ramps and Inclines	
<input type="checkbox"/> Y <input type="checkbox"/> N	Floor and Wall Openings	
<input type="checkbox"/> Y <input type="checkbox"/> N	Elevated Surfaces	
<input type="checkbox"/> Y <input type="checkbox"/> N	Fixed Ladders	
<input type="checkbox"/> Y <input type="checkbox"/> N	Environmental Controls	
<input type="checkbox"/> Y <input type="checkbox"/> N	Powered Vehicles	
Workplace Hazard Assessment		
<input type="checkbox"/> Y <input type="checkbox"/> N	Personal Protective Equipment and Clothing*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Personnel/Vehicle/Truck Gate/Post Exposure* (to be assessed at all sites where officers are required to physically open/close or control gates for personnel or site vehicle access and exit)	
<input type="checkbox"/> Y <input type="checkbox"/> N	Hazardous Materials/Substance Communication*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Hazardous Chemical Exposures	
<input type="checkbox"/> Y <input type="checkbox"/> N	Flammable and Combustible Material Exposure	
<input type="checkbox"/> Y <input type="checkbox"/> N	Fire Protection*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Infection Control/Bloodborne Pathogen (BBP) Exposure*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Noise Exposure*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Material Handling Exposure	
<input type="checkbox"/> Y <input type="checkbox"/> N	Transporting of Employees and Materials	
<input type="checkbox"/> Y <input type="checkbox"/> N	Confined Space Exposures*	
<input type="checkbox"/> Y <input type="checkbox"/> N	Confined Space Responsibilities* (assess if officers have any responsibilities for permit required confined space entry)	

<input type="checkbox"/> Y <input type="checkbox"/> N	Emergency Plans*
<input type="checkbox"/> Y <input type="checkbox"/> N	Ergonomic Exposure*
<input type="checkbox"/> Y <input type="checkbox"/> N	Animal and Insect Exposure Heat Exposure*
<b>Equipment Assessment</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N	Portable/Moveable Stairways (to be assessed if used by officers on site)
<input type="checkbox"/> Y <input type="checkbox"/> N	Portable Folding Step and Extension Ladders: (to be assessed if used by officers on site)
<input type="checkbox"/> Y <input type="checkbox"/> N	Powered & Electric Hand Tools, Electric Equipment/Machinery & Guarding* (to be assessed if officers are required to use as part of normal assigned duties)
<input type="checkbox"/> Y <input type="checkbox"/> N	Lock Out/Tag Out of Machinery* (to be assessed if Paragon vs. Client personnel are required to de-energize equipment)
<input type="checkbox"/> Y <input type="checkbox"/> N	Compressed Gas and Cylinders (to be assessed if cylinders are used and stored on site)

\* For all section titles marked with an asterisk, the Paragon Safety Manual contains additional information and protocols to be followed.

*Note: As the assessment is conducted for each of the applicable sections, if an answer is checked off that is not green in color, the client is to be contacted by site supervision or Paragon management to discuss what provisions/corrective actions will taken to address the deficiency, and to be provided with an estimated timetable for completion. Site Supervision is to track completion of corrective actions. All officers working at the facility are to be informed of noted safety concerns and what protective actions(s) they are to take until safety issues have been corrected.*

### Instructions for Electronic Version:

Review the Index and identify all applicable hazards and risks for the facility where the assessment is being conducted. Then check off the appropriate categories, and the specific items that have been checked off will be downloaded for assessment. Items that are not checked do not need to be evaluated unless additional hazards are discovered while conducting the assessment.

## GENERAL SITE ASSESSMENT

Injury Illness Prevention Plan			
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Has a written Injury Illness Prevention Plan (IIPP) been developed for this location? (if N, see Section Injury Illness Prevention Plan in the Safety Manual)
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Has the IIPP been reviewed at least annually and updated whenever new hazards are identified or introduced to the site?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Is there a copy of the IIPP in place and available at all posts on site?
Officer Designated Posts			
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are officer posts clean & orderly?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Is a cleaning service and trash removal schedule provided by the client?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If provided with a desk, is desk in good condition with rounded edges?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Is flooring in good condition with no holes, rough surfaces?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are work surfaces kept dry or appropriate means taken to assure the surfaces are slip resistant?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If posts are provided with removable carpeting, is it in good condition and on a scheduled cleaning/replacement schedule?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If a seated post, are chairs in good working condition?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If a standing post, is matting available to cushion feet if required to stand for long periods of time?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are there adequate electrical outlets for appliance/computer/device hook up?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If in a separate building, is building in good condition (no leaks in roof, holes in floors or walls, no mold)?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are doors and windows in good working order and operating freely?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are curbs outside of post in good condition and properly highlighted with yellow paint to make changes in elevation visible?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If an elevated post, are stairs/steps to enter the post in good condition, edges highlighted, with slip resistant edges?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	If an elevated post, is the first step outside the door the same elevation as the interior floor of the post?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are railings provided for the stairs/steps and are they secure?
<input type="checkbox"/> Y	<input type="checkbox"/> N	<input type="checkbox"/> N/A	Are hard wired phones, cell phones, or radios available for each post?



<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there restrooms available for the posts? (If Y, fill out the restroom or portable restroom portion of checklist)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is post provided with heating & air conditioning and are both maintained in good working order and on a scheduled maintenance program?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is potable water available for each post via drinking fountains or water coolers drinking, washing, or cooking?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If N to the last question, is cool pure drinking water provided at the beginning of each shift via water bottles in quantity to allow for 2 gallons of water/shift/employee?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are non-potable water outlets that are not suitable for drinking clearly identified?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If officers are not allowed to leave their post and are expected to eat at the post, is the post provided with a refrigerator for food storage?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If officers are required to take their meal break or relief breaks at the client's worksite, are officers provided with a suitable sheltered place to eat?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are lunch/break rooms available with refrigerators to store food, and a means for heating & the consumption of food or drink if officers are allowed to leave their posts for lunch breaks?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are lunch and break rooms clean, free of clutter or debris, and on a designated cleaning schedule?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If designated lunch/break rooms are not provided, are there places within the client facilities for officers to take their lunch breaks or rest breaks e.g. food courts?
<b>Restrooms</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are interior restrooms with toilets and hand washing stations available in minimum quantities for officer use at all times? (If N, go to next question)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable restrooms available for officer use as needed? (If Y go to portable restroom section, If N, go to next question)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are provisions made to allow officers to leave the post or site to allow for restroom breaks and are they indicated in post orders?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are interior restrooms located on the same floor & not more than one floor-to-floor flight of stairs from regular officer posts or work areas?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If restroom will be occupied by no more than one person at a time, can it be locked from the inside?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are restrooms in a clean, sanitary & serviceable condition, and free of mold?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are restrooms on a regular cleaning schedule and is the cleaning schedule being followed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are restrooms well lighted so any water on flooring can be detected?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are toilet paper holders and sanitary napkin holders (if restroom is used by women) provided in each restroom?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are toilet paper, sanitary napkins, soap, & paper hand drying towels if air hand driers are not provided, checked and replenished on a regular schedule to ensure availability at all times?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are waste containers available and scheduled to be emptied not less than once per day?
<b>Portable Restrooms:</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable restrooms provided for officers at out posts or remote locations if it is not feasible to provide toilets that are hooked up to sewers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable restrooms located in close proximity to officer posts for use whenever needed? (If N, go to next question)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are provisions made to allow officers to leave the post or site to allow for restroom breaks & are they indicated in post orders?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If restroom will be occupied by no more than one person at a time, can it be locked from the inside?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is portable toilet vented?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is portable toilet equipped with lighting if it is to be used after dark?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hand washing facilities/portable hand washing stations available at or adjacent to each portable restroom? (If N, go to next question)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable restrooms equipped with waterless skin-cleansing agents that are capable of disinfecting the skin or neutralizing the contaminants to which the officers may be exposed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are toilet paper holders & sanitary napkin holders (if restroom is used by women) provided in each portable restroom?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are toilet paper, sanitary napkins, soap, paper hand drying towels, water for portable hand washing stations, and/or waterless skin cleansing agents checked and replenished on a regular schedule to ensure availability at all times?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are restrooms in a clean, sanitary & serviceable condition, and free of mold?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are restrooms on a regular cleaning schedule and is the cleaning schedule being followed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable restrooms pumped out and treated with chemicals on a designated schedule?
<b>Interior Lighting</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all interior areas of the site well/adequately lighted during normal working hours?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is night safety lighting in place that remains on at all times to light routes to exit points when main lighting is turned off?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is night safety lighting available for officer designated patrol routes after hours, weekends & holidays?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there emergency lighting (battery or emergency generator power) in place that comes on for all egress routes in the case of a loss of power?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If officers have to turn on lighting, can officers get to switches without the need to use a flashlight to find switches?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If there are areas where officers are required to turn on lights, are lights turned on by switches and not by circuit breaker panels?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does site have a program to check & replace burned out lighting, or to replace burned out or broken lights whenever notified?
<b>Exterior Lighting</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior lighting for parking lots and facility provided to improve pedestrian & motorist safety?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior lighting provided for security camera observation and is lighting adequate for cameras?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior lighting blocked by tree and/or bush growth?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior lighting adequate to reduce shadows and improve visibility/contrast in patrol areas?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior parking lot lighting adequate to be able to see pedestrians and the surrounding areas?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is exterior lighting around building(s), in parking lots and around the perimeter adequate to detect trespass and/or break-ins?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If there are areas where external lighting is not adequate or dark, are flashlights provided to officers to shine into the areas without needing to walk into them while making their patrols?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all exterior doors properly lighted?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does site have a program to check & replace burned out or broken lighting, or provisions made to do so whenever notified?
<b>Exits and Egress Routes</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are directions to exits properly marked with visible signage and provided with emergency lighting or some form of luminescent devices to direct personnel to the exits?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are doors, passageways, or stairways that are designated exits and egress routes maintained to provide unobstructed egress from all parts of the facility to a public way at all times?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a minimum of two means of egress from every building structure or area to be used during emergencies?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all exits properly marked with reliable lighting source and indicated by lighted EXIT signs?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are doors, passageways, or stairways that could be mistaken as exits or access to exits but are NOT, properly marked as "NOT AN EXIT", "TO A BASEMENT ", "STOREROOM" or by similar description?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do all designated egress doors swing out?
<b>Interior Walkways:</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisles and walkways appropriately marked?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are changes in elevation properly marked/highlighted?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisles and walkways properly lighted so all obstacles, changes in elevation, debris on the surface, protrusions or trip hazards (e.g. bolts sticking up, elevated flooring cracks, etc.) easily visible without the need to use a flashlight?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are holes in floor, walkways, or other walking surfaces properly covered, barricaded, or been made safe?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is adequate headroom provided for the entire length of any aisle or walkway or properly marked & padded if not?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisles and walkways free of oil, wet surfaces, mold, slime from equipment, or covered with slip resistant materials?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisles and walkways kept clear and free of obstacles, clutter and/or trip hazards (e.g. extension cords, hoses, loose flooring, torn carpet, uneven/wrinkled carpet)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are materials or equipment stored so that sharp projectiles do not stick out into or block the aisles or walkways?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisles or walkways that pass near moving or operating machinery, welding or similar operations, arranged so employees will not be subjected to potential hazards?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there safe clearance for walking in aisles or walkways where motorized or mechanical handling equipment is operating?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are guard rails provided to prevent stepping from entrances/exits, stairways, doors or hallways into the path of motorized or mechanical handling equipment?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is the glass in windows, doors, or glass walls that are subject to human impact of sufficient thickness and type for the condition of use?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are unused portions of pits and pits not actually in use either covered or protected by guardrails or equivalent?
<b>Exterior Walkways</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are walkways properly marked?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are walkways across roadways properly marked?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are changes in elevation (e.g. curbs or steps) properly marked/highlighted with yellow paint?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are walkways free of protrusions or trip hazards (e.g. elevated cracks in concrete or asphalt, tree roots etc.)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are exterior walkways properly lighted for low light or night conditions so obstacles or hazards can be seen without the need to use a flashlight?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are walkways free of standing water, mud, debris, loose gravel, liquids for storage containers etc.?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are materials or equipment stored so that sharp projectiles or edges do not protrude into or block the walkways causing the need to take evasive action?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Where exits from building(s) immediately open to roadways, are guard rails provided to prevent stepping directly into traffic lanes?
<b>Patrol Routes</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to make indoor and outdoor patrols?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are patrol routes specified/laid out and identified based on identified potential risks and agreed upon with client?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have all patrol routes been walked to verify routes are safe and free of hazards?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is a program set up to re-evaluate exterior patrol routes due to changes in weather causing the introduction of new hazards (e.g. ice, snow, mud, water ponding, fallen branches or blown debris from high winds, etc.)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are patrol routes laid out so officers can walk in lighted areas after dark and then use a flashlight to view areas each side of route vs. having to walk in dark areas?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If patrol routes are through construction areas, are routes walked frequently to take into account changes caused by work being done and new hazards being introduced and redesigned/rerouted to minimize exposure to newly identified hazards?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are exterior patrol routes laid out using available paths or walkways vs. having to walk across open fields/areas, up and down hills/inclined surfaces, or over rocky terrain?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If stairs and ramps are included in patrol routes, are they provided with hand railings?
<b>Stairs and Stairways</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are standard stair rails/hand rails provided for all stairways having 4 or more risers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If stairs go to an elevated exterior post, are handrails provided for all stairs regardless of number of risers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hand rails sturdy and in good repair?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hand rails more than 3" from the wall or any other obstruction?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are handrails clean and free of grease, oil or excessive dust?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are stair treads in good condition, and not excessively worn or broken?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are stair steps designed or provided with a slip resistant surface?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are stair treads free of grease, oil, debris, excessive dust, mud or ice?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are stairs, stairways or landings well lighted so front edges can be detected at all times whenever walking up or down stairs?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are stair landings large enough to stand on when opening doors, or after going through a door before having to go down stairs or making a change in elevation?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do stairs have more than 7'-0" clearance above the steps?
<b>Ramps and Inclines</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ramps or inclines provided with railings, edge protection, and handrails if required to be walked on?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ramps or inclines covered or made with slip resistant surfaces (e.g. cut grooves, diamond plating, sand in paint, slip resistant stick on tape etc.)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ramps or inclines kept free of debris, oil, grease, stones, mud, snow, or ice?
<b>Floor and Wall Openings</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are floor openings guarded by a cover, guardrail, or equivalent on all sides (except when at entrances to stairways or ladders)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If openings are covered by steel plating, is plating secured so it will not slip out of place by foot or vehicle traffic with beveled edges to minimize tripping?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are toe boards installed around the edges of a permanent floor openings where persons may pass under the opening?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are grates or similar type covers over floor openings e.g. floor drains designed so that foot traffic or rolling equipment will not be affected by the grate spacing?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are unused openings to pits or conveyors etc. that are not in use either covered or protected by guardrails, barriers or covers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are any walkways that pass adjacent to or above dangerous equipment or hazardous operations guarded with railings and toe boards?
<b>Elevated Surfaces</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are guard rails provided whenever aisles or walkways are elevated more than 30 inches above adjacent flooring or the ground?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is a permanent means of access & egress provided to elevated work surfaces, mezzanines, and storage areas?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are elevated areas provided with a adequate head clearance?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If material is piled, stacked or racked on elevated work surfaces is it done to prevent it from tipping, falling, collapsing, rolling, or spreading?
<b>Fixed Ladders</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to use fixed ladders to access different elevated portions of the facility while making patrols? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all fixed ladders to be used by officers in good condition and properly secured?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are fixed ladder rungs, rails & steps free of splinters, sharp edges, projections, grease, oil, mud, rust, or excessive dust?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ladder rungs uniformly spaced at a maximum of 12" for the entire length of the ladder?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ladders at least 16" wide and designed so the foot can not slip off the end?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there at least 7" between ladder rungs to any wall or obstruction at the back of the ladder?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there at least 30" of clearance from the front of the ladder to the nearest permanent object on the climbing side of the ladder?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is the step from the ladder to the next surface or landing not less than 2 1/2" and not more than 12"?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do side rails of the ladders extend at least a minimum of 42" over the top of the nearest structure or equipment?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are cages or fall protection devices provided for ladders that are over 20 feet tall?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If egress at the top of the ladder is through a hatch cover, is cover counter balanced and provided with a catch latch?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there at least 60 degrees of hatch cover opening ?
<b>Environmental Controls</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there asbestos or asbestos containing materials anywhere in the facility? (If N, skip next question) be done in this section)

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If the facility has asbestos or asbestos containing materials are caution labels and signs present to warn of presence of asbestos?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there any high heat areas in the facility where officers will need to perform assigned duties? (if Y, See Heat Exposure section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If required to work in high heat areas, are areas provided with spot cooling or air conditioning?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are employees screened before assignment to high heat areas to determine if their health condition could make them more susceptible to have an adverse reaction?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hazardous materials or hazardous waste stored or used on site? (If Y, make sure to fill out the Hazardous Chemical Exposures section of the checklist)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hazardous materials identified which may cause harm by inhalation, ingestion, skin absorption or contact?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there written standard operating procedures for the selection and use of respirators where needed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If officers are required to wear respiratory protection while working in areas with hazardous materials, are officers medically screened to make sure the wearing of respiratory protection will not cause medical stressors?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there areas in the facility with high noise levels? (If Y, make sure to fill out the Noise Exposure section of the checklist)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are high noise areas noted with signs indicating that hearing protection is required?
<b>Powered Vehicles</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to use powered vehicles while performing their assigned duties? (If Y, answer the following questions, and refer to Section 9 - Vehicle Safety in the Safety Manual for specific vehicles, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have all officers completed the Paragon Safe Driving program prior to use of any vehicle?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have trainers received certified Train-the-Trainer training on the proper programs for each type of vehicle to be used on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented training on the proper safe use of each type of vehicle they will be using while on duty?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have all vehicles to be used by officers been approved for the type of patrols/duties to be performed while on duty?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are vehicles all set up for a preventative maintenance program?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If safety issues are noted are procedures in place for the removal of vehicles from service until full repairs have been implemented?

## WORKPLACE HAZARD ASSESSMENT

<b>Personal Protective Equipment (PPE) and Clothing</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there any officer roles & responsibilities that require the wearing of PPE? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has a job site analysis and PPE assessment been performed for all guarding roles & responsibilities to be performed on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is personal protective clothing or equipment that employees are required to wear or use of a type capable of being easily cleaned and/or disinfected?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is personal protective equipment provided for use in all identified hazardous areas where required?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are protective glasses, goggles or face shields provided and worn where there is a danger/risk of eye injuries e.g. flying materials, particles, or corrosive liquids ?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are gloves, or other PPE provided to provide protection against cuts, abrasions (i.e. for checking truck/ container seals)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hard hats provided and worn where there is a danger of falling material, bump hazards, or in construction zones?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are hard hats inspected periodically for damage to shell and the suspension system?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is appropriate foot protection required where there is a risk of foot injuries from crushing, falling objects, penetrating actions, or liquid absorption of hazardous /corrosive materials?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is approved respiratory protection provided for designated operations, hazardous atmosphere areas, or for emergency use or response where needed, and if so have officers been medically approved, fit tested & trained on use?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is appropriate uniform or exterior clothing and gear provided for use where needed to protect from extreme cold, heat, chemical exposures in the workplace?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers working on streets & roadways with exposure to traffic hazards provided and required to wear hi-visibility vests?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is all PPE maintained in a sanitary condition and ready to use at all times?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers prohibited from interchanging personal protective clothing or equipment unless it is properly cleaned and inspected?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented training on how to properly put on, take off & maintain PPE they are required to use?
<b>Personnel/Vehicle/Truck Gate/Post Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to open, close, or operate personnel or vehicular gates at this facility? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If required to open, close or operate gates, have all gates been evaluated using the Gate Safety Inspection Checklist?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers been trained on how to operate all gates safely, prevent being caught in pinch points & entrapment zones?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers provided high visibility safety vests for all vehicular access gates if required to go out and inspect vehicles?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is lighting provided at gate entrances so officers can clearly see and be seen by vehicles or pedestrians during low light conditions?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are roadways where officers have to inspect vehicles at gates free of potholes, uneven surfaces, mud, standing water?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do officers have to cross over multiple lanes of traffic to check vehicles in and out?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If Y, to last question, is there an area between lanes officers can safely stand without being in the moving traffic lanes?
<b>Hazardous Material/Substance Communication</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has Client provided a list of hazardous materials and substances used or stored at this facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a written Hazardous Communication program in place for the site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is the name of the person responsible for filing of Safety Data Sheets (SDS), container labeling, and training at the client site made available to officers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a training program in place to train officers on locations of all hazardous materials on site and when new materials are introduced to the site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does training program include explanation of how to read an SDS and Global Harmonized System labeling symbols, where written Hazardous Communications program and Safety Data Sheets (SDS) can be located at the site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Safety Data Sheets (SDS) available 24 hours per day for officers to obtain needed information on materials?
<b>Hazardous Chemical Exposures</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there any hazardous chemicals on the site? (If Y, answer the following questions. If N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all hazardous material containers (e.g. storage tanks, drums vats, bottles, cans, bags etc.) properly labeled with the product identity and GHS hazard warnings?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers trained & aware of chemicals on site that may cause harm by inhalation, ingestion, or skin contact, and how they are to detect their presence, and procedures to use whenever coming in contact with these materials?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is PPE provided maintained, and/or required to be worn by officers on site when coming in contact with any hazardous chemicals that are on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there portable or permanent eyewash stations & safety showers provided and located in areas where hazardous chemicals are processed or handled on the site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are eyewash stations & safety showers inspected and flushed monthly to ensure proper & safe operation if needed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are site hazardous chemical spill containment & clean-up procedures established by the client with contact names and numbers available for officers to notify the client if an incident is detected on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there any Hazardous Waste Operations (HAZWOPER) on site where hazardous waste materials are handled, stored, or disposed of?



<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If HAZWOPER materials are on site, are officers required to respond at the First Responder Awareness Level to identify the material from a safe distance, notify the client, and keep crown control from a safe location?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If Y to last question, have officers received the appropriate level of documented HAZWOPER training as required by OSHA regulations?
<b>Flammable and Combustible Material Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are any flammable or combustible materials used, produced, dispensed or stored on the site? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are flammable or combustible liquids stored in approved tanks or approved containers for handling & dispensing?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all flammable liquids kept in closed containers when not in use (e.g. parts cleaning tanks, pans, waste drums)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are combustible scrap, debris & waste materials (e.g. oily rags or oil soaked paper towels) stored in covered metal containers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is proper storage practiced to minimize the risk of fire including spontaneous combustion?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all connections on liquid containers (e.g. tanks & drums) with liquid piping and/or vapor tight & not leaking?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are flammable liquids and oxidizing agents separated while being stored?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does the facility have a smoking policy and is it enforced?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is smoking prohibited in areas where flammable & combustible materials are used, stored, or dispensed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are "NO SMOKING" signs posted in appropriate areas where flammable and combustible materials are present if smoking is permitted at the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there any evidence of smoking in areas that are designated as "NO SMOKING"?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are designated smoking areas well marked?
<b>Fire Protection</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a fire prevention plan for the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does fire prevention plan describe types of fire protection equipment and/or systems in the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are established hot work procedures & practices in place to control potential fire hazards & ignition sources?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Will officers have any responsibility for issuing hot work (HW) permits on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If officers are to issue HW permits, is a training program in place for officers before being permitted to issue a permit?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does the facility have sprinkler systems installed for fire protection?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a fire alarm/notification system, and is it in good working order with all alarms working properly?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to test sprinkler system alarms on a scheduled basis?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers expected to manually activate fire protection systems, and if so have officers received training on the types of systems present, how to activate them, or how to shut them down?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a facility diagram indicating where different sprinkler systems are located and where control panels are located so officers know where to respond to alarms?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is proper clearance maintained between sprinkler heads and stored/stacked materials?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are sprinkler heads protected with metal guards when exposed to physical damage (e.g. damage from fork trucks)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are sprinkler heads free of paint?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers given training regarding fire hazards of materials and processes they will be exposed to in the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers expected to use fire extinguishers or fire hoses (if present) to put out incipient (initial/beginning) stage fires at the facility without the need to wear any PPE or protective fire fighting equipment?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If Y, do officers receive annual refresher training on the types and proper use of fire extinguishers & use of fire hoses?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable extinguishers mounted in readily accessible locations with signage for easy location when needed?



<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable fire extinguishers provided in adequate numbers and types (within 75 ft of outside flammable liquid use, within 10 ft of inside flammable storage areas and mounted/spaced no more than every 75 ft for Class A fires or every 50 ft for Class B fires inside the facility)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Class A - Combustible Materials e.g. wood , paper, cloth, trash & other normal combustibles?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Class B - Flammable & Combustible Liquids e.g. gasoline, grease, oil , paint & other flammable liquids?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Class C - Electrical Equipment e.g. fires in energized electrical equipment, control panels, computers, wiring, etc.?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Class D - Combustible Metals e.g. magnesium, lithium, titanium, aluminum?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Class K - Cooking Media e.g. animal or vegetable cooking oils and fats?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Water Extinguishers
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Dry Chemical Extinguishers
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Carbon Dioxide (CO2) Extinguishers
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Halon Extinguishers
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers responsible for monthly inspections of portable fire extinguishers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are fire extinguishers inspected monthly and noted on attached cards or tags?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are fire extinguishers serviced, maintained at least annually and recharged after use as noted on the inspection tags?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are extinguishers fully charged and in their designated locations?
<b>Infection Control/Bloodborne Pathogens (BBP) Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Based on contractually agreed upon roles & responsibilities, are officers to provide response to emergency situations on site where First Aid, CPR, or other actions/duties could potentially expose officers to infectious diseases, blood, or other potentially infected bodily fluids without regards to the use of PPE (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a written site Exposure Control Plan (ECP) in place to address identified potential employee exposures to BBPs based on specified assigned roles & responsibilities (If N, see Section 12 - Bloodborne Pathogens in Safety Manual)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is the ECP available or accessible to officers at all times?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is the site ECP updated at least annually?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers with potential exposure to BBPs been offered to except or decline the Hep B series of vaccinations within 10 days of being assigned to the site, and are acceptances or declinations on file?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has documented BBP training/information program which includes the use of universal precautions, use of PPE, and needlestick exposure/management been provided to all employees that have the potential for BBP exposure as part of their assigned roles & responsibilities?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is necessary PPE (e.g. gloves, face shields, glasses or goggles, CPR mouthpieces, resuscitation bags, etc.) provided or available on site for all officers that the potential BBP exposure?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers aware of specific workplace practices to follow when appropriate (e.g. hand washing, handling of sharp instruments/needles/sharps, handling of laundry, proper disposal of contaminated materials and disinfection of reusable equipment)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does the site have appropriate equipment available to comply with workplace practices to clean up spills (e.g. hand washing sinks, biohazard bags, biohazard tags & labels, needle containers, detergents/ disinfectants, etc.)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does site have procedures in place regarding all equipment/working surface cleaning and disinfection after being potentially contaminated during a BBP incident?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does site have designated procedures for the appropriate removal and disposal of leak proof containers, biohazard bags or puncture-resistant holders that contain disposed biohazard waste?
<b>Noise Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has Client indicated that there are high noise areas where officers will be required to wear hearing protection to enter and therefore requires a "Hearing Conservation Program"? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have high noise areas been measured & recorded by the client using noise monitoring equipment?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there areas in the workplace where continuous noise levels exceed 85 decibels (dBA)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have areas that exceed 85 dBA been marked as "Hearing Protection Required" areas, or are building layouts in place that indicate where high noise areas are located that require hearing protection be worn when entering?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is approved hearing protection equipment available for all officers to wear when entering or working in designated high noise areas that exceed 85 dBA?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is an initial and annual refresher training preventive health program in place to educate officers of safe noise levels & exposures, the effects of noise on their health, the proper fitting, installation & use of hearing protection?
<b>Material Handling Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do officer's assigned roles & responsibilities require the handling of freight, boxes, mail, luggage, etc.? (If Y, answer the following questions, if N, not further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If Y, if lifting is to be done manually, has documented proper lifting techniques training been given to all officers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If handling is required, is it to be done with manually operated hand carts and/or lifts, and are carts & lifts maintained in good working condition?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If handling is to be done using motorized carts, motorized industrial vehicles (fork lifts), personnel carriers, golf carts, or cart type ambulances does the client have a training and licensing program for operation of vehicles?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are motorized vehicles and equipment inspected daily or at the beginning of each shift prior to use?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there safe clearance for equipment to be taken through aisles & doorways where items need to be moved??
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are aisle-ways designated, permanently marked, and kept clear to allow unhindered/unobstructed passage?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If items are to be moved from delivery vehicles, are vehicles shut off & brakes set prior to loading or unloading?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If movement is done from a loading dock, are dock boards/bridge plates used between the vehicle & dock when loading or unloading operations are taking place?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are trucks/trailers secured from movement during loading & unloading operations?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If chutes or gravity rollers are used, are sections firmly placed and secured to prevent displacement while items are moving on them?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If chutes are used, are chutes equipped with side boards of sufficient height to prevent materials being handled from falling off?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	At the delivery end of chutes or rollers are provisions made to break the movement of the handled materials?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are pallets and other containers inspected before being loaded, unloaded, or moved?
<b>Transporting of Employees and Materials</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to drive motorized vehicles at this site or post? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do officers who operate vehicles on public thoroughfares have a valid operator's licenses and have completed the Paragon Safe Driving Program?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	When seven or more employees are regularly transported in a van, bus, or truck, is the operator's license appropriate for the class of vehicle being driven?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is each van, bus, or truck that is used regularly to transport employees/personnel equipped with an adequate amount of seat belts?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If transport of personnel is by truck, is it provided with appropriate methods to prevent their falling from the vehicle?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are personnel transport vehicles equipped with lamps, brakes, horns, mirrors, windshields in good repair & working turn signals?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are personnel transport vehicles provided/equipped with two reflective type flares and a fully charged 4BC rated fire extinguisher?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are fire extinguishers in vehicles checked monthly & inspected at least annually to make sure they are in good working condition?
<b>Confined Space Exposures</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does the site have any non-permit confined spaces and/or permit required confined spaces as defined in the Safety Manual and OSHA? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has the Client provided a list with all the locations of confined spaces on site with indicated dangers present in each?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does Client have a written confined space entry program developed and implemented to prevent unauthorized entry, and does the written program address proper procedures & equipment to be used during entry to ensure all entries are conducted the safest way possible?
<b><i>In addition, the written confined space entry program should take into consideration all the following items as applicable:</i></b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all confined space entry points marked as "DANGER - Permit Required Confined Space - DO NOT ENTER or Authorized Entrants Only"
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is a confined space entry permit used & filled out prior to each confined space entry & renewed at the beginning of each shift?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are confined space entry permits only filled out & provided by a trained Entry Supervisor who knows how to fill out the permit, knows the precautions/procedures to be followed prior to & upon entry, and has the atmospheric testing conducted prior & during entry and documented to verify the confined space is safe to enter?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are confined space entry & rescue procedures written out, reviewed & understood by all entrants & rescue providers prior to allowing each confined space entry?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are only employees with specific training as Entrants, Attendants, & Rescue Providers verified before entry is permitted?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there assigned safety standby attendant outside of the confined space at all time whose sole responsibility is to watch the work in progress, sound an alarm if necessary, and render assistance or rescue if needed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there at least one other trained attendant in the vicinity if there needs to be an entry rescue in the confined space?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is standby attendant or other rescue trained employees prohibited from entering the confined space without lifelines and respiratory equipment if there is any questions as to the cause of an emergency?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is approved equipment for all types of rescue provided, inspected & in place prior to each entry?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are First Aid and CPR trained personnel immediately available on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does client coordinate entry operations with contractors by reviewing hazards identified & experienced with confined spaces to be entered and the client's procedures designated to protect entrants?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	When entrants are client & contractor employees, are entry operations coordinated while all are working in & near the confined space?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does client verify all contract personnel performing entry have received documented training before allowing entry?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are debriefings held after each entry is completed regarding any hazards confronted or created in the confined space during the entry operations?
<b>Confined Space Responsibilities</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers exposed to non-permit and permit required confined spaces at this site? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are confined space hazards indicated in the site post orders which show the officers where all permit required confined spaces are located as part of employee orientation upon being assigned to provide service at the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers assigned any responsibilities during confined space entry operations?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	<p>Prior to agreeing to participate in any confined space responsibilities, has Paragon Senior Regional Management been consulted to make sure that provisions have been made to cover the risk, and that levels of indemnification &amp; liability coverage are in place and agreed to by the client?</p> <p><i>Note: If determined &amp; contractually agree to have responsibilities for confined space entry assigned to officers, the <b>only</b> services that may be provided would be atmospheric testing, attendant monitoring, non-entry rescue, and provision of First Aid &amp; CPR outside of confined space, and provided only after documented specific training has been provided by certified trainers. Officers are <b>never</b> to be Entry Supervisors, and are <b>never</b> to enter Permit Required Confined Spaces or perform entry rescue.</i></p>
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers responsible for <u>atmospheric testing</u> of the confined space? (If Y, assess the following questions)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are atmospheric testing meters to be used for testing provided by the client?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented training on how to properly conduct testing with the type(s) of meter(s) to be used to conduct atmospheric testing of the permit required confined spaces?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers been trained on how test all levels/stratified layers of the confined space to determine oxygen content, then for flammable gases or vapors (in that order), and the amount of time it takes the meter to accurately obtain the readings at each level tested based on the length of hose used between the meter and the end of the wand?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Was training conducted by a certified trainer that received training from the manufacturer or manufacture's rep.?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are testing meters in good working condition and calibrated at least monthly?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are meters bump checked with test material before each use, before each shift, or at least daily?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are initial and all subsequent atmospheric testing that is conducted for entry operations provided to the Entry Supervisor for the permit entry process so Entry Supervisor can make a determination if it is safe for entry to occur or if entry is unsafe and all operations are to stop?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Officers responsible to take on the <u>role of the Attendant</u> ? (If Y, assess the following questions)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented training regarding Attendant duties for knowing the entry hazards (e.g. mode, signs, or symptoms & consequences of exposure to entrants), behavioral effects of entrants, keeping accurate account of entrants, not leaving until relieved by another trained attendant, maintaining communication with entrants, monitoring activities inside & outside of confined space for unsafe conditions, summoning or rescue services, performing NO other duties while acting as an Attendant?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are attendants provided with a means of communication and the contact numbers to be used for contacting emergency service responders in the case of an confined space rescue emergency?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Officers <u>responsible for non-entry rescue</u> operations? (If Y, assess the following questions)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has the client provided the rescue equipment required for the different types of rescue operations to be performed for all confined spaces on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers been trained on how to inspect, set-up and operate rescue equipment to be used during rescue in each type of non-entry rescue operation to be performed (e.g. horizontal or vertical rescue)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is all rescue equipment inspected before & after each confined space entry to verify condition & proper working order?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does non-entry rescue training include simulated rescue extractions on an annual (every 12 months) basis from actual or representative type spaces to remove dummies/manikins with respect to opening size, configuration, and accessibility with the appropriate equipment to be used to retrieve entrants?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are <u>officers responsible for providing First-Aid &amp; CPR</u> for each confined space entry? (If Y, assess the following questions)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented Am. Red Cross or Am. Heart Assoc. First-Aid & CPR training and required refresher training by certified trainers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Has client provided PPE, first-aid materials & equipment needed to respond to confined space entry emergencies?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are First-Aid materials & equipment inspected before and after each entry and replenished, repaired or disinfected as needed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers that are to provide first-aid or CPR notified of all confined space entries, given the location of each entry to minimize response time, or are officers required to be on standby near confined space entry operations?
<b>Emergency Plans</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have emergency escape/evacuation procedures and routes been developed and communicated to all employees & contractors?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are escape/evacuation routes posted throughout the facility?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a public alarm (PA) systems in the facility, and if so is it maintained & tested to make sure all speakers are working properly so that broadcast emergency actions are recognizable & perceptible above existing noise conditions?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do employees who remain to operate or shut down critical plant operations before they evacuate know the proper procedures that need to be followed?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there designated take shelter areas in the facility and are they marked appropriately for employee identification?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there identified outside mustering areas from different portions of the facility posted for evacuation so employees need to know where to go and head counts can be conducted?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are written procedures established for how to report emergencies, who to notify, how, when & who is contact outside emergency response teams, and are contact numbers posted & kept up-to-date?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do written emergency procedures specifically call out security assigned roles & responsibilities, and are these designated in the site post orders?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have officers received documented training on their emergency roles & responsibilities and know what they are to do?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is security to conduct a designated number of mock emergency drills per year to maintain emergency preparedness in all areas where security has designated responsibilities?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are written procedures reviewed & updated after each emergency if needed, and at least annually?
<b>Ergonomic Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers required to use equipment, computers/electronic devices, or to perform repetitive operations?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Can work be done without eye strain, glare to eyes, prolonged raising of arms, or prolonged stooping at neck or shoulders to view the task?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there tasks that cause pressure points on any parts of the body (e.g. wrists, forearms, back or thighs)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Can work be done without twisting or overbending of the lower back?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Can work be done using the larger body muscles?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all pieces of furniture adjusted, positioned, free of sharp edges, and arranged to minimize strain to body parts?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are tools, instruments & machinery shaped, positioned and handled to allow tasks to be performed comfortably?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there sufficient rest breaks provided in addition to regular rest breaks to relieve stress from repetitive motion tasks?
<b>Animal and Insect Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Does the site have a pest control program in place to reduce the exposure to rodents (e.g. mice & rats), insects (e.g. mosquitos, hornets, wasps, honey bees, fleas, ticks) and spiders?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all Security posts checked on scheduled basis for removal of pests and removed/eradicated whenever found?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have larger animals (e.g. dogs, cats, snakes racoons, possums) been observed on site and, and precautions taken to fix openings in fencing, or placement of barriers to prevent burrowing under posts been used to prevent infestation of pests on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a pest control service identified to be called whenever pests have been reported?
<b>Heat Exposure</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Officers assigned to interior or exterior posts or required to conduct patrols or perform assigned roles & responsibilities for extended periods of time where temperatures can exceed 80 degree F? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a site Heat Illness Prevention Plan (HIPP) in place and available at all posts on site (if N, see Section 2 - Heat Illness Prevention Program in the Safety Manual)?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have Officers been trained on the HIPP, including Paragon's responsibility for water provision at the beginning of each shift and/or where potable water can be found in the workplace, the importance of drinking a minimum of 4 cups of water/hour and the procedures for notifying supervision if water supplies have reached less than half or the normally provided quantities, the importance of shade and taking breaks/rests to cool down in shaded or cooled areas, how to recognize signs and symptoms of heat related illness, and the first aid and emergency response procedures to follow should heat illness occur as required by Federal and State Regulations?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have Supervisors been trained on the HIPP, including their responsibility for checking daily weather advisories for pending hot weather conditions and advising employees of pending conditions, for the water provision at the beginning of each shift and checking that water supplies are available and replenished as needed per shift, the importance of documented periodic checks on employees and encouraging employees to drink a minimum of 4 cups of water/hour, the provision of shade and reinforcing the taking of rest/cool down breaks as needed, the procedures to follow when employees exhibit recognized signs and symptoms of heat related illness and the first aid and emergency response procedures to follow should heat illness occur as required by Federal and State Regulations?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Have Patrol routes been evaluated to determine if there are adequate rest/break areas provided along the patrol route so Officers can rest in a shaded or an air conditioned area as needed to cool down when temperatures exceed 85 degrees F?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are indoor posts provided with air conditioning, or opening windows & fans, and plumbed potable drinking water ?



<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If plumbed water is not available, are officers provided access to fresh, pure, suitably cool drinking water in the form of bottled water, 5-10 gallon jugs of water, or water coolers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If dispensers are used, are single use disposable cups provided and checked daily to make sure enough cups are available at the beginning of each shift?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are outdoor posts provided with shade in the form of natural vegetation, canopies that can be adjusted as sun elevations change, or an air conditioned vehicle?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Officers provided access to fresh, pure, suitably cool drinking water at the outdoor posts?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	In the event an employee has any of the symptoms of heat illnesses, are officers provided an effective communication by voice or electronic means, e.g., a cell phone or text messaging device, at the work site where reliable reception is available to contact their Supervisor or Emergency Medical Services (EMS) directly when necessary.
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are employees provided with a map & phone number that can be used to give directions to EMS to respond, or know directions into/unto any site where any employee is suffering from heat illness if Emergency Medical Services need to be contacted?

## EQUIPMENT ASSESSMENT

Portable/Movable Stairs	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable/movable stairways used by officers at the site to take readings, reach items or operate valves etc. at high elevations? (If N, go to next section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable stairways provided with railings on both sides & on top of platform, slip resistant steps & platform, and functioning braking mechanism?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do portable metal stairs have signage reading "CAUTION - Do not use near electrical equipment or lines"?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable stairways in good condition with free moving wheels?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable stairway steps, platforms and railings free of grease and oil?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable stairways only provided for use on hard/level surfaces and prohibited for use on gravel or surfaces with large holes or cracks?
Portable Folding Step and Extension Ladders	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable ladders, folding step ladders, or extension ladders used by officers on site? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable step ladders & extension ladders maintained in good condition, free of defects, all steps securely fastened to rails, secure hinges and spreading/locking mechanisms that do not bind when used, all hardware and fittings securely attached, and moveable parts operating freely with out binding or undue play?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ladders equipped with rungs & steps spaced between 8"-12" and provided with slip resistant surfaces?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all ladder legs/rails provided with slip resistant adjustable pads?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are extension ladders equipped with positive stops & locks to ensure the minimum amount of overlap is not compromised and in good working order?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do metal ladders have signage reading "CAUTION - Do not use near electrical equipment or lines"?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If portable ladders are used as a temporary fixed ladder, is ladder securely fastened/tied off to a stationary structure, with solid level footing at base of ladder?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are top two steps of ladders highlighted and/or marked with "DO NOT Use as a Step"?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is a program in place that prohibits the employee use of ladders with broken or missing steps, rungs or cleats, broken side rails, or other faulty equipment?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are ladders regularly inspected, and if found defective, immediately tagged & removed from service until repaired or replaced?
Powered & Electric Hand Tools, Electric Equipment/Machinery & Guarding	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable electric hand tools or electric equipment used by officers as part of their assigned duties? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers given documented training on the proper safe use of all electrical equipment operation?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are the tools that are provided the proper tools for the specific tasks officers are required to perform?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are appropriate safety glasses, face shields and other PPE provided while using hand tools or equipment that may produce flying material, sparks, or be subject to breakage?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all tools provided to officers for work at the site inspected regularly and in good working condition?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all corded electric tools or equipment properly grounded or of double insulated construction with cords in good condition without any fraying, splices, exposed wiring or tape?

<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there enough electrical outlets provided for the number of pieces of equipment being used in the post area without over loaded outlets?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If multiple plugs adapters are used, are the provided units all the approved surge protector type?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is all wiring to plug outlets at guard posts securely attached to the wall, with no loose exposed wiring & provided with cover plates?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	At all posts is all equipment properly wired through conduit if not in the walls without being run with unprotected wiring through holes in the walls, ceilings or floors?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is all manufactured equipment being used by officers provided with appropriate guarding to prevent exposure to rotating or moving parts, and is guarding still in place and adjusted properly?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are effective guards in place over belts, pulleys, chains & sprockets, on equipment to be used by officers on site?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a power shut-off switch within operator reach of all electrical equipment & is it red in color?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Can electrical power to equipment/machines be locked out for maintenance, repair or security?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are portable fans provided with full guards or screens that have openings of 1/2" or less?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are pneumaic and hydraulic hoses on powere-operated tools checked regularly for deterioration or damage?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Do officer duties require the use of any machines? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a training program to instruct employees on safe methods of machine operation?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a regular program in place for the safety inspection of the machinery & equipment being used by the officers?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is all machinery & equipment kept clean and properly maintained?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Is there a power shut-off switch within reach of the operator's position at each machine?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Can electric power to each machine be locked out for maintenance, repair, or security?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are all emergency stop buttons colored RED?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are manually operated valves & switches that control the equipment & machine operation clearly identified & readily accessable?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are foot-operated switches guarded or arranged to prevent accidental actuation by personnel or falling objects?
<b>Lockout/Tagout of Machinery</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are Paragon officers vs. Client personnel required to de-energize electrical equipment at any time? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	As part of assigned duties, are officers required to de-energize equipment before entering into any areas to conduct an inspection that has robotic equipment? (if Y, refer to Section 19 in the Safety Manual - Control of Hazardous Energy)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are procedures in place for each specific piece of equipment that requires de-energizing?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are de-energizing and designated lockout/tagout procedures only performed by officers or supervisors that have received specific documented training on each type of equipment that will need to be de-energized?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are officers/supervisors provided with appropriate tags or locks required for the designated lockout tagout procedures?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	If procedures require the turning off power in electrical control panels, are officers/supervisors given Electrical Safe Working Practices training regarding methods to be used, along with the provision of appropriate safety/flash resistant PPE to be worn to perform the task?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Before power is returned, are all locks and tags accounted for to verify that all work is completed and device(s) are safe to have power restored?
<b>Compressed Gas and Cylinders</b>	
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are there any compressed gas cylinders used or stored on site where officers are required to make patrols? (If Y, answer the following questions, if N, no further assessment needs to be done in this section)
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are cylinders legibly marked identifying the gases contained, and stored in areas where they will not be damaged by passing or falling objects, or subject to tampering by unauthorized persons?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are cylinders stored in areas which are protected from external heat sources e.g. flame impingement, intense radiant heat, electric arcs, or high temperature lines?



<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are cylinders transported or stored in a manner (e.g. chained to racks) to prevent them from creating a hazard by tipping, falling or rolling?
<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A	Are storage areas marked for the proper placement and identification of full or empty cylinders?

**Noted assessment hazards and corrective action record:**

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

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Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

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Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

---

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

---

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

# 5B SECURITY OFFICER SAFETY INSPECTION CHECKLIST

Client Site: \_\_\_\_\_ Site Address: \_\_\_\_\_

Inspected By: \_\_\_\_\_ Inspection Date: \_\_\_\_\_

## FLOORS

- |  |   |
|--|---|
| Good condition without cracks, protrusions or holes? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Aisles marked separating foot & vehicular traffic?   | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Slippery free of water, oil, etc.?                   | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Material in aisles?                                  | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Good rugs or mats properly placed and flat?          | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Sufficient space to walk between equipment?          | <input type="checkbox"/> Y <input type="checkbox"/> N |

## STAIRWAYS

- |                                    |   |
|------------------------------------|---|
| Secured handrails provided?        | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Stair treads in good condition?    | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Stairs clean and clear of objects? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Stairs well lighted?               | <input type="checkbox"/> Y <input type="checkbox"/> N |

## EQUIPMENT

- |   |   |
|---|---|
| Chairs & office equipment in good condition?        | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Ladders, if used, in good condition?                | <input type="checkbox"/> Y <input type="checkbox"/> N |
| All other used equipment in good working condition? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## EXITS

- |  |   |
|--|---|
| Exit doors provided with push/crash bars?      | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Exits unlocked from the inside and unobscured? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are all EXIT signs lit and visible?            | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Emergency procedures/Evacuation Plans posted?  | <input type="checkbox"/> Y <input type="checkbox"/> N |

## PERSONAL FACILITIES

- |   |   |
|---|---|
| Are toilet & hand washing facilities available & clean? | <input type="checkbox"/> Y <input type="checkbox"/> N |
|---|---|

## FIRE SYSTEMS

- |   |   |
|---|---|
| Facility equipped with sprinkler systems?             | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Sprinkler systems inspected regularly, in good cond.? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Sprinkler heads unobstructed/unblocked, unpainted?    | <input type="checkbox"/> Y <input type="checkbox"/> N |

## PROTECTIVE ALARMS

- |  |   |
|--|---|
| Is fire alarm system used on site & procedures known?  | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are alarms working & tested on a scheduled basis?  | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Can alarms & PA systems be heard throughout facility?  | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is security communication equipment in use and capable of transmitting instructions to all key posts simultaneously?           | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is there more than one security communication system available for exclusive security personnel use?                           | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is there more than one system of communication with outside emergency & protective agencies (radios, telephones, cell phones)? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## PROTECTIVE LIGHTING

- |  |   |
|--|---|
| Is facility lighting adequate to provide a degree of protection equal to daylight hours during evenings? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is additional lighting provided at active portals and points of possible intrusion/entry?                | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are flashlights provided for use to shine into areas without adequate lighting while making patrols?     | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are patrol routes & stairs illuminated during off-hours?   | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are lights all working properly?   | <input type="checkbox"/> Y <input type="checkbox"/> N |

## ENVIRONMENT

- |  |   |
|--|---|
| Chemical smells/spills noted & corrected?          | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Noted flammable materials properly stored/secured? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## MACHINERY

- |  |   |
|--|---|
| Exposed moving parts properly safe guarded?  | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Any oil leaks/spills or accumulations noted? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## GROUNDS

- |  |   |
|--|---|
| Are cracks in sidewalks/pot holes in parking lots noted? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are changes in elevations identified by markings?        | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Any noted obstructions in/on walkways?                   | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Patrol routes free of obstructions or STF hazards?       | <input type="checkbox"/> Y <input type="checkbox"/> N |

## GATES / DOORS

- |  |   |
|--|---|
| Are all used gates in good working order?        | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Do all gates move freely/ operate smoothly?      | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are all used doors and locks operating properly? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## FIRST AID / MEDICAL TREATMENT

- |   |   |
|---|---|
| Is First Aid kit(s) available & fully stocked?      | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are Emergency Phone Numbers posted & up to date?    | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are employees aware of reporting injury procedures? | <input type="checkbox"/> Y <input type="checkbox"/> N |

## PERSONAL PROTECTIVE EQUIPMENT (PPE)

- |  |   |
|--|---|
| Is eye protection available & utilized where required?   | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is hearing protection available & utilized where req'd.? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are safety shoes or boots utilized where required?       | <input type="checkbox"/> Y <input type="checkbox"/> N |

## PROGRAMS

- |   |   |
|---|---|
| Is copy of Site Post Orders available & used/reviewed?    | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Are Safety Data Sheets made readily available & used?     | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Is a copy of Site IIPP, HIPP & Emergency Plans available? | <input type="checkbox"/> Y <input type="checkbox"/> N |
| Do Officers have a copy of the Security Officer Handbook? | <input type="checkbox"/> Y <input type="checkbox"/> N |

Note: Use back of form to note any additional safety concerns observed.



## SECTION 6

# Job Hazard Analysis

# Job Hazard Analysis

## Introduction

One way to increase the knowledge of hazards in the workplace is to conduct a job hazard analysis on individual tasks. A job hazard analysis (JHA) is a procedure which helps integrate accepted safety and health principles and practices into a particular operation. In a JHA, each basic step of the job is examined to identify potential hazards and to determine the safest way to do the job.

Other terms used to describe this procedure are Job Safety Analysis (JSA), Job Hazard Assessment, and Task Hazard Analysis. For the purposes of this section the words “analysis” and “assessment” are to be considered as synonymous. The term “job” is used to indicate a fairly broad activity which may or may not include all responsibilities of a single employee. A “job” might be “Lobby Officer” or “Patrol Driver”.

As the term “Job” is all inclusive, it is better to break the analysis it down into “tasks” of a specific work assignment, such as “opening a gate for access control,” or “input client employee information into computer”

The Job Hazard Analysis is conducted by observing a worker as a “task” is actually being performed. The major advantage of a JHA is that it does not rely on individual memory and that the process prompts recognition of hazards. For infrequently performed or new jobs, observation may not be practical. Therefore one approach is to have a group of experienced employees and supervisors complete the analysis through discussion. One advantage of this method is that more people are involved allowing for a wider base of experience and promotes a more readily accepted work procedure.

Initial benefits from developing a JHA will become clear in the preparation stage. The analysis process may identify previously undetected hazards and increase the job knowledge of those participating. Safety and health awareness is raised, communication between workers and supervisors is improved, and acceptance of safe work procedures is promoted.

A written work procedure based on the completed JHA can serve as a teaching aid for initial job training and as a briefing guide for infrequent jobs. It may be used as a standard for health and safety inspections or observations and it will assist in completing comprehensive accident investigations.

While observing the employee performing the task, any activity or situation that could reasonably be perceived as presenting a potential risk of injury is to be noted. The auditor then determines if each hazard identified can be abated through use of Engineering Controls. If so, the appropriate actions are taken to ensure hazard abatement through Engineering Controls. If not, the auditor then determines if the hazard can be abated through Administrative Controls.

If the hazard cannot be abated through Administrative Controls the auditor then determines what Personal Protective Equipment (PPE) would be required to protect the employee.

Ideally, all jobs and their related tasks should be subjected to a JHA. As this may represent a very time consuming project tasks are to be prioritized to ensure that the most critical jobs are examined first. In assigning a priority for analysis of jobs/tasks, the following should be considered:

- Accident frequency and severity: jobs where accidents occur frequently or where they occur infrequently but may have resulted in disabling injuries

- Potential for severe injuries or illnesses: the consequences of an accident, hazardous condition, or exposure to harmful substance are potentially severe
- Newly established jobs: due to lack of experience in these jobs, hazards may not be evident or anticipated
- Modified jobs: new hazards may be associated with changes in job procedures
- Infrequently performed jobs: workers may be at greater risk when undertaking non-routine jobs, and a JHA provides a means of reviewing hazards

## Preparing for the JHA

After a job has been chosen for analysis, the next stage is to break the job into tasks. A job task is a segment of the job of sufficiently limited scope to allow a thorough hazard analysis.

Care must be taken not to make the tasks too general, thereby missing specific steps and their associated hazards.

The worker to be observed should be fully briefed on the scope and purpose of the JHA and assured that the JHA is neither a time and motion study in disguise, nor an attempt to uncover individual unsafe acts.

The job/task, not the individual, is being studied in an effort to make it safer by identifying any hazards and making modifications to eliminate or reduce them.

The job should be observed during normal times and situations. For example, if a job is routinely done only at night, the JHA review should also be done at night. Similarly, only regular equipment should be used. The only difference from normal operations is the fact that the worker is being observed.

Based on observations of the job/task, knowledge of accident and injury causes, and personal experience, the auditor notes the things that could go wrong at each step. A second observation of the job being performed may be needed in order to ensure a thorough assessment.

## Five Steps of a JHA

There are five primary steps to performing the JHA. A sample JHA is found in Section 6(a).

Step 1. Identify the job / position to be assessed. This could be a position such as; a lobby officer, a rover, a patrol driver, etc...

Step 2. Identify the primary tasks that the job requires. List these tasks on the form. These could be identified such as; access control, foot patrol, data entry, etc... If there are more than five primary tasks, use an additional form.

Step 3. Identify potential hazards associated with each task. Observe the employee in the same manner that they perform their tasks. Have the employee in great detail explain how they go about performing the task. Note potentially hazardous sources of:

- Temperature extremes (both interior or exterior)
- Chemical exposures (including fumes)

- Unsanitary conditions
- Harmful dust
- Lighting levels (inadequate or not available to see hazards)
- Falling objects
- Dropping objects
- Flying sparks due to cutting or welding
- Sharp objects (Equipment related or associated with Bloodborne Pathogens exposure)
- Rolling/pinching/closing/swinging objects which could crush the feet or hands
- Hazards due to layout of the workplace
- Falls (Working above floor level, on roofs, or elevated platforms, ladders)
- Slips/Trips/Falls (patrol routes, inclines, hazards due to walking/working in areas with uneven surfaces or obstructions)
- Hazards due to low head clearance
- Hazards due to damaged equipment or worn surfaces
- Hazards due to location of co-workers
- Exposed energized electrical equipment
- Noise
- Stress
- Repetitive Motion
- Bending
- Lifting Hazards (heavy or awkward)
- Twisting
- Turning
- Reaching (objects not within easy reach above head or too far to safely obtain)
- Moving of heavy items
- Other

Step 4. Determine hazard abatement or control by “Engineering Controls” or “Administrative Controls”: List each hazard you identified above by Hazard Source and Task Number, such as P3 for Repetitive Motion for Task3. Then determine if the hazard can be abated through Engineering Controls (Physical Barriers, or changes to work area). If it can, note the method. If it cannot, determine if the hazard can be abated through Administrative Controls (work practices). If it can, note the method. If it cannot, proceed to identify any Personal Protective Equipment (PPE) that can eliminate the hazard.

Step 5. Determine Proper PPE. List each hazard that cannot be abated through Engineering Controls or Administrative Controls, by Hazard Source and Task Number, and determine what type of PPE needs to be provided, and if PPE is provided, if PPE provides proper protection.



## 6A JOB HAZARD ANALYSIS CHECKLIST

Location/Client: \_\_\_\_\_

Position: \_\_\_\_\_

JHA Completed By: \_\_\_\_\_ Date: \_\_\_\_\_ Time: \_\_\_\_\_

Employee(s) Observed: \_\_\_\_\_

Task 1: \_\_\_\_\_

Task 2: \_\_\_\_\_

Task 3: \_\_\_\_\_

Task 4: \_\_\_\_\_

Task 5: \_\_\_\_\_

### Hazards Identified

A. Temperature extremes (refrigeration, furnaces, etc...): ☐ NO ☐ YES Task# \_\_\_\_\_

B. Heat stress (Working at high temperature post, interior, exterior): ☐ NO ☐ YES Task# \_\_\_\_\_

C. Chemical exposures: ☐ NO ☐ YES Task# \_\_\_\_\_

D. Harmful dust: ☐ NO ☐ YES Task# \_\_\_\_\_

E. Lighting levels: ☐ NO ☐ YES Task# \_\_\_\_\_

F. Falling objects: ☐ NO ☐ YES Task# \_\_\_\_\_

G. Dropping objects: ☐ NO ☐ YES Task# \_\_\_\_\_

H. Motion: ☐ NO ☐ YES Task# \_\_\_\_\_

I. Rolling/pinching/closing objects (Which Could Crush the Feet or Hands): ☐ NO ☐ YES Task# \_\_\_\_\_

J. Hazards due to layout of the workplace: ☐ NO ☐ YES Task# \_\_\_\_\_

K. Hazards due to location of co-workers: ☐ NO ☐ YES Task# \_\_\_\_\_

L. Exposed energized electrical equipment: ☐ NO ☐ YES Task# \_\_\_\_\_

M. Falls (Working above floor level, Slip/Trip/Fall Hazards): ☐ NO ☐ YES Task# \_\_\_\_\_

N. Noise: ☐ NO ☐ YES Task# \_\_\_\_\_

O. Stress: ☐ NO ☐ YES Task# \_\_\_\_\_

P. Repetitive Motion (Ergonomics): ☐ NO ☐ YES Task# \_\_\_\_\_

Q. Lifting hazards (Twisting/Turning, Bending, Reaching, Heavy Lifting): ☐ NO ☐ YES Task# \_\_\_\_\_

R. Sharp objects ( Equipment, needles, blood borne pathogens): ☐ NO ☐ YES Task# \_\_\_\_\_

S. Hazards due to low head clearance: ☐ NO ☐ YES Task# \_\_\_\_\_

T. Slip/Trip/Fall hazards: ☐ NO ☐ YES Task# \_\_\_\_\_

## 6A JOB HAZARD ANALYSIS CHECKLIST

U. Moving of heavy items: ☐ NO ☐ YES Task# \_\_\_\_\_

V. Other Hazards (Indicate hazard): ☐ NO ☐ YES Task# \_\_\_\_\_ Hazard: \_\_\_\_\_

### Hazard Abatements

Task# \_\_\_\_\_

Hazard Identified: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date Completed: \_\_\_\_\_

Task# \_\_\_\_\_

Hazard Identified: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date Completed: \_\_\_\_\_

Task# \_\_\_\_\_

Hazard Identified: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date Completed: \_\_\_\_\_

Task# \_\_\_\_\_

Hazard Identified: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date Completed: \_\_\_\_\_

Task# \_\_\_\_\_

Hazard Identified: \_\_\_\_\_

Corrective Action: \_\_\_\_\_

Date Completed: \_\_\_\_\_

*If additional tasks are identified that need to be addressed attach additional pages as needed.*

### Notes

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## SECTION 7

# Safety Training

# Safety Training

## Introduction

All employees will receive regular safety training and training with respect to the hazards unique to the employee's job assignments. Training will be provided upon hire and additional site specific training will also be conducted. Training will be scheduled as needed and will be documented as part of the employee's training file.

## Responsibilities

### District & Human Resource Managers

- Ensure each new employee receives Safety Orientation Training
- Hazardous Communication (HAZCOM) /Global Harmonization System (GHS) Training
- Provide employee safety training unique to his/her job assignment
  - » Injury Illness Prevention Plan and Heat Illness Prevention Plan
  - » Bloodborne Pathogens (BBP) if employees may come in contact with BBPs as part of assigned duties including Hepatitis B vaccination offer within 10 days of hire
  - » Emergency First Aid Training
  - » Site specific training based on assigned roles & responsibilities, site post orders, and site emergency response procedures
- Conduct on-going training activities for review and/or to address new issues or introduction of new equipment or hazards to the worksite
- Maintain records of all employee training and refresher training
- Maintain a safety training library
- Review and evaluate training program in order to maintain a high level of effectiveness and interest in safety subjects and site safety programs based on site hazards

### Employees

- Attend and participate in all safety training classes
- Provide feedback to Managers on the effectiveness of training classes for improvement or indicate additional subjects of interest or for clarification of topic matter if not fully or easily understood
- Study all materials provided and apply the knowledge to your job tasks

### Corporate/Regional Management

- Provide economic assistance to establish training programs
- Act as a source of reference and obtain, develop and distribute safety training materials, as needed

## Orientation

Safety orientation of new employees and development of safety awareness begins with screening of job applicants. New employees are to be advised of the company's Safety Policy and Safety Program. They must receive a general orientation on conditions that exist at client sites, be instructed in how and to whom accidents are to be reported, where and how to receive First Aid; they must discuss with their supervisor unsafe acts and unsafe conditions. The employees must also understand that violations of safety practices may be cause for disciplinary action, up to and including dismissal.

At the time of hire, all new hires are given a handbook entitled, "Security Officer Handbook." This handbook includes sections relating to safety issues, fire hazards and the proper reporting, forms and procedures.

"Paragon Safe Driving" program is to be given to all employees who will be assigned to drive any type of vehicle (e.g. cars, trucks, carts, Segways, bicycles, etc.) while on duty. If new equipment is introduced into the workplace, no employee will be authorized to use this equipment until training on use of the equipment is completed. This program will be made available to all District and Corporate Personnel who will be driving on company business while performing their normal job functions.

The field supervisor provides the security officer with on-the-job instruction. They must alert officers to safety hazards at each location, monitor the officer's personal safety habits, provide tips for personal safety, and oversee safety training.

The "New Employee Safety Training Checklist" should be used to control and document the safety training process. **BASIC** safety training must include, but not be limited to the following:

- Policy statement
- Statement of safety objectives and summary of the safety program
- Copy of the Area or Region's office's safety regulations
- Statement signed by the officer, acknowledging receipt of the above documents. This can be recorded on the "New Employee Safety Training Checklist"
- Paragon training films, which may include a film on basic safety
- Testing on knowledge of safety related portions of the officer's manual, and safety rules of the area office and the site

In the first orientation meeting, fundamental safety concepts should be stressed: that every employee is responsible for his and her safety; that Paragon's success depends upon safe job performance, and that communication and participation on the part of the employee make the safety program successful.

Employees should be instructed on what they must do, why they must do it, and what processes or procedures cannot be varied from. They should not merely be told to be careful; they should be shown how to be careful. At no time is any employee to complete any activity or procedure that the employee feels is unsafe. If felt unsafe, the employee is to notify supervision and await guidance on what steps are to be taken before proceeding.

Training new employees should include a survey of their individual safety habits or tendencies to be careless or not fully focused on what they are doing. This survey can best be performed during a walk-through.

A survey should also take place when an experienced employee begins to show signs of disregard for personal safety or the safety of fellow workers. It should also take place when an employee returns from a period of disability or leave of absence.

If Personal Protective Equipment (PPE) is required, supervisors should explain how, why and when to use the equipment. The employees are to be trained on proper donning and doffing techniques and how to properly inspect, maintain, and clean the equipment. Employees should be equipped for and use the same personal protective equipment used by a client's employees under similar conditions. For instance, if the employee is making rounds through an area where client's workers are using safety glasses or hearing protection, our employee should use safety glasses or hearing protection while passing through the area.

Field Supervisors must point out hazards and unsafe conditions (wet and slippery floors, protrusions, uneven surfaces or holes in walkways, dimly lighted areas, objects blocking aisles, projections or low head clearances); they must caution against unsafe acts (not holding handrails while walking down stairs or ramps/inclined areas, multi-tasking or not paying attention to where a person is walking, passing through a dark area without a flashlight, tipping back a chair, leaning back in a swivel chair, horseplay). In addition, a Job Hazard Analysis should be conducted to determine if any hazards need to be addressed in the workplace while employees are performing assigned tasks.

Employees should be trained to recognize safety hazards, unsafe acts and unsafe conditions. They should be advised to correct these conditions if they can. If they cannot, they are to report them on their Daily Activity Report (DAR) and to site supervision. The corrective action can then be taken to by the client for remediation. If no action is taken, it is incumbent on the District Director to talk to the client.

Disciplinary procedures for safety infractions are to be clearly explained to employees.

Supervisors must create safety awareness in all officers and in the workplace that never relaxes while on the job and extends off the job.

Most useful contacts are made through frequent safety inspections of the client site to determine if correct procedures are being followed, and to offer guidance to the officer(s). The inspections help to sharpen employee's eyes for safety, provide supervisors with the opportunity to initiate corrective action and to confirm that the selection of the officer(s) for that post is correct.

Employees should have regular safety contact with their supervisor to reinforce positive safety habits and awareness. "Safety toolbox meetings" should become part of every supervisory contact in the field.

## **Discipline:**

If supervisors do a proper job in training officers, a minimum of discipline is required to ensure they carry out their duties safely. Supervisors should not tolerate unsafe and hazardous practices any differently than a poor appearance or poor performance. Failure by any employee to adhere to the written safety policies and procedures is subject to disciplinary actions.

## Assignment to Post Training:

At the time of assignment to a new post, our employees are given a training period which includes site specific safety and health issues. It is our employees' responsibility to understand the specifics of the site and to ask questions if you are unsure of the site specific safety and health issues.

The "Employee Safety Training Checklist" should be used as a guide for training and must be signed by both the employee and manager upon successful completion of each training session/topic. The training checklist is to be kept with the employee's file.

## Periodic Safety Training for All Employees

The following must be provided:

- Periodically by subject (annually, monthly and/or as needed)
- Before a new process or piece of equipment is put into operation
- Annual refresher to maintain certifications or competence
- Pre-operation training to ensure a safe operation or procedure
- Instructional meeting content should consist of a specific safety subject directly related to operational safety

## Training Records

All training activities should be documented and maintained in a Safety Training File. This documentation should include:

- the name of the trainer
- the name(s) of the employee(s) trained
- the subject of the training
- the date and duration of the training
- results of testing given

Records should be retained and distributed as follows:

- Copy to Safety Training File
- Original to Personnel File (when indicated)

## Training Resources

Training resources are available from a number of sources:

- Corporate Office
- Insurance Representatives
- Local fire & emergency services
- Safety policies, rules, and topics included in this manual
- In-house experts
- Vendors and Associations



# 7A EMPLOYEE SAFETY TRAINING CHECKLIST

**(To be completed within 30 days of hire)**

Supervisor(s)/Instructor(s) to check, initial, and indicate the date training was completed for each item.

**Completed** **Initial/Date**

- |  |                          |       |
|--|--------------------------|-------|
| 1. General description of Paragon Systems Safety Program   | <input type="checkbox"/> | _____ |
| 2. Review of Officer's Employee Handbook - Safety Section  | <input type="checkbox"/> | _____ |
| 3. Review of Paragon site specific Injury & Illness Prevention Plan (IIPP)   | <input type="checkbox"/> | _____ |
| 4. Review of Paragon site specific Heat Illness Prevention Plan (HIPP)   | <input type="checkbox"/> | _____ |
| 5. Review of procedures for the reporting of workplace injuries  | <input type="checkbox"/> | _____ |
| 6. Review procedure for reporting unsafe conditions & practices in the workplace   | <input type="checkbox"/> | _____ |
| 7. Review of procedures for the reporting of safety related incidents ( non-injury/near miss)  | <input type="checkbox"/> | _____ |
| 8. Review of site specific Post Orders   | <input type="checkbox"/> | _____ |
| 9. On-The-Job review of safe practices on how to perform all assigned duties in a safe manner  | <input type="checkbox"/> | _____ |
| 10. Review site Emergency Action or Response Plans (EAP or ERP) to understand roles and actions to be taken in the event of fires/explosions, severe weather (tornado, flood, blizzard, earthquake, hurricane), bomb threats, emergency egress exit signals and evacuation routes to be taken for areas based on client site specific documents/procedures | <input type="checkbox"/> | _____ |
| 11. Review of employee rights and duties under Worker's Compensation Laws of the state the employees will be working   | <input type="checkbox"/> | _____ |
| 12. Review of verbal and written warning and other disciplinary procedures relating to safety violations   | <input type="checkbox"/> | _____ |

**The following safety topics are to be included in the new employee training where applicable if the site an employee will be assigned to has any of the noted hazards, exposures, requires the use of PPE, or the officers operation of gates:**

- |  |                          |       |
|--|--------------------------|-------|
| 13. Review use & care of personal protective equipment (PPE) if required to be worn on site  | <input type="checkbox"/> | _____ |
| 14. Review of safe operation of all gates at sites where officers need to open & close gates   | <input type="checkbox"/> | _____ |
| 15. Review of how to conduct a site hazard evaluation and filling out of officer safety inspection checklist   | <input type="checkbox"/> | _____ |
| 16. Review of Hazardous Communication/Global Harmonization Standard (HAZCOM/GHS)<br><i>Note: Required if hazardous materials are at assigned site, including knowing where to find Safety Data Sheets (SDS) binder or website</i>          | <input type="checkbox"/> | _____ |
| 17. Review of Infectious Disease & Exposure Control Plan (Blood Borne Pathogens Standard)<br><i>Note: Required within 10 days if assigned duties can be expected to have exposure to BBPs, including offer of Hepatitis B Vaccinations</i> | <input type="checkbox"/> | _____ |
| 18. Review of Hazardous Waste Operations Standard (HAZWOPER)<br><i>Note: Required if hazardous waste materials or operations are at assigned site, training to be given to the level of response contractually agreed to be performed</i>  | <input type="checkbox"/> | _____ |
| 19. Review of Asbestos Standard <i>Note: Required if asbestos is located at assigned site</i>  | <input type="checkbox"/> | _____ |

**Note: Additional items to be added as determined necessary based on site hazards and officer role & responsibility requirements**

**Supervisor(s) / Instructor(s) that provided training:** *Note: Use back of sheet if more than two instructors provided training*

Name \_\_\_\_\_ Initials \_\_\_\_\_ Date \_\_\_\_\_

Name \_\_\_\_\_ Initials \_\_\_\_\_ Date \_\_\_\_\_

**I have received and been instructed in the above training items and fully understand each item presented:**

Employee's Name (printed) \_\_\_\_\_ Date of Hire \_\_\_\_\_

Employee's Signature \_\_\_\_\_ Date \_\_\_\_\_

# 7B SITE SPECIFIC SAFETY TRAINING CHECKLIST

## TRAINING TO BE COMPLETED IF ANY OF THE FOLLOWING ARE REQUIRED DUTIES

(To be completed upon hire)

Supervisor(s)/Instructor(s) to check, initial, and indicate the date training was completed for each item.

	Completed	Initial/Date
1. Safe bag inspection (use of stick not hands, flashlight, wearing of gloves)	<input type="checkbox"/>	_____
2. Safe bicycle usage (inspection, braking, proper signals, following vehicle safety procedures)	<input type="checkbox"/>	_____
3. Safe opening of doors (proper techniques, what to do if not working properly)	<input type="checkbox"/>	_____
4. Safe gate operation (how to do safely, how to inspect, what to do if not working properly)	<input type="checkbox"/>	_____
5. Guard Post Safety (Being aware of hazards and how to work safely while at post)	<input type="checkbox"/>	_____
6. Offering Safe Assistance (provide services only as contratuually agreed upon or safe to undertake)	<input type="checkbox"/>	_____
7. Safe data entry on tablets, phones & Vision devices (done at check location, not while walking)	<input type="checkbox"/>	_____
8. Safe motorized vehicle usage (inspection, proper signals, following vehicle safety procedures)	<input type="checkbox"/>	_____
9. Safe shoplifter procedures (observe and report, ID and vehicle description, license number)	<input type="checkbox"/>	_____
10. Safe trespassor procedures (Safe approach, calm speech, safe 6 ft. spacing, MOAB techniques)	<input type="checkbox"/>	_____
11. Safe truck inspection procedures (no climbing on truck, proper seal check/removal, driver openingdoors)	<input type="checkbox"/>	_____
12. Safe vehicle inspection (vehicle put in park, driver opens trunk, vehicle safety spacing)	<input type="checkbox"/>	_____
13.		
14.		
15.		

**Note: Additional items to be added as determined necessary based on site hazards and officer role & responsibility requirements**

**Supervisor(s) / Instructor(s) that provided training:**

*Note: Use back of sheet if more than two instuctors provided training*

Name \_\_\_\_\_ Initials \_\_\_\_\_ Date \_\_\_\_\_

Name \_\_\_\_\_ Initials \_\_\_\_\_ Date \_\_\_\_\_

**I have received and been instructed in the above training items and fully understand each item presented:**

Employee's Name (printed) \_\_\_\_\_ Date of Hire \_\_\_\_\_

Employee's Signature \_\_\_\_\_ Date \_\_\_\_\_



## SECTION 8

# Personal Protective Equipment (PPE)

# Personal Protective Equipment (PPE)

## Introduction

Depending upon location and type of operation on the job safety may necessitate the use of Personal Protective Equipment (PPE). Some examples of this are:

- In a location where injury to an eye may be possible, the use of safety glasses would be mandatory;
- Certain mining, chemical manufacturing, or construction contracts have specific rules on protective equipment and should be followed implicitly e.g. wearing of respiratory protection, fire resistant clothing, chemical resistant gloves, hard hats & goggles;
- During icy weather, cleats might be made available to aid officers in making their rounds;
- In areas where there is an exposure to either constant or sudden acute noises above 85 decibels as determined by client site, hearing protection would be required for all exposed personnel.

It is the responsibility of Program Managers and Field Supervisors to:

- Have Personal Protective Equipment available and provided to employees where exposures exist
- Make sure that employees have been trained on the proper use, inspection and maintenance of the equipment, and
- Ascertain that the proper equipment is being used by the employees when there is a reasonable probability of injury that can be prevented by such equipment

Employees are to be counseled on the consequences for failure to use the proper equipment. Not only could it result in injury to the employee, but it could also affect the safety of other workers at the same location as it could easily create a situation hazardous to fellow employees. In the event an employee does not use the required PPE, supervisors are not relieved of responsibility for taking corrective action.

Should an employee request Personal Protective Equipment, or request repair or replacement of damaged equipment, the request will be acted upon immediately. Failure to do so may result in an injury to an employee, and a potentially serious liability for the supervisor and the company.

## Responsibilities

The Program Manager or Field Supervisor must assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of PPE. The manager/supervisor shall verify the hazard assessment in writing. If hazards are present, or are likely to be present, the manager/supervisor shall select the appropriate PPE that will properly fit and protect affected employees against the identified hazards, and provide and make it available at no cost for each affected employee to use. Damaged or defective equipment shall not be used at any time.

The manager/supervisor must provide training to each employee required to use PPE. Training will include:

- When PPE is necessary to be used based on the identified hazards,
- What PPE is necessary to be worn,
- How to properly put on, take off, and adjust and wear the PPE, limitations of the PPE,
- The proper care, maintenance, useful life, and disposal of the PPE,

- Verification that employees demonstrate an understanding of the training and the ability to use the PPE properly before being allowed to perform the work requiring the use of the PPE, and
- Retraining if there is reason an already trained employee does not have the understanding or skill required to use the PPE, if there are changes in the workplace rendering training obsolete, or changes in the type of PPE to be used

The manager/supervisor has to certify in writing that the employee has received and understands the training.

## Eye and Face Protection:

Employees must use appropriate eye or face protection when exposed to eye or face hazards from flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation. Some examples are safety glasses with or without side shields, goggles, face shields, filtered lenses safety glasses, full-face respirators.

Requirements for side shield protection, prescription lenses, filter lenses, and identification of the manufacturer are to be spelled out. Protective eye and face devices must comply with ANSI Z87.1-1989 or be demonstrated to be equally effective.

Many occupational eye injuries occur because worker are not wearing any eye protection or from wearing it improperly. Injuries may also result from poorly fitting eye protection. Managers and supervisors must be sure that their employees wear appropriate eye and face protection and that the selected form of protection is appropriate to the work being performed and properly fits each worker exposed to the hazard.

## Foot and Leg Protection:

Employees must wear protective footwear to protect against foot or leg injuries when working in areas where there is a danger of foot injuries due to falling or rolling heavy objects, or sharp objects piercing the soles (e.g. nails or spikes), exposure to molten metal, hot, wet, or slippery surfaces, and where employees' feet are exposed to electrical or chemical hazards. Foot and leg protection choices include:

- Leggings
- Safety shoes
- Toe guards
- Metatarsal guards
- Combination foot and shin guards
- Electrically conductive shoes
- Electrical hazard safety-toe shoes
- Foundry shoes

Protective footwear purchased must comply with ANSI Z41-1991 or be equally effective.

*(Note: the employer is not required to pay for non-specialty prescription safety eyewear and/or non-specialty safety-toe protective footwear, including steel-toe shoes or boots, provided the employer permits such items to be worn off the job-site)*

## Head Protection:

Protecting employees from potential head injuries is a key element of any safety program. A head injury can impair an employee for life or it can be fatal. Wearing a safety helmet/hard hat is one of the easiest ways to protect an employee's head from injury. Hard hats can protect employees from impact and penetration hazards as well as from electrical shock and burn hazards.

Head gear shall be chosen based on the type of hazards identified, be adjustable for proper fit which allows sufficient clearance between the shell and the suspension system for ventilation and distribution of an impact.

Employees must wear protective helmets or hard hats when working in areas where there is a potential for injury to the head from falling objects. And employees shall conduct daily inspections of protective head gear suspension system.

Any hard hats found with the following defects are to be removed from service and replaced:

- Perforation, cracking, or deformity of brim or shell;
- Indication of exposure of the brim or shell to heat, chemicals or ultraviolet light or other radiation (e.g. loss of surface gloss, or signs of chalking or flaking)

A hard hat is always to be replaced if it sustains an impact even if damage is not noticeable. It is not necessary to replace the entire hard hat when deterioration, damages/tears, or when excessive wear in the suspension system is noticed. Suspension systems are available.

Protective helmets designed to reduce electrical shock hazards shall be worn by each such affected employee when near exposed electrical conductors which could contact the head. Purchased protective helmets shall comply with ANSI Z89.1- 1986 or be equally effective.

## Hand and Arm Protection:

Based on workplace hazard assessments, Managers/Supervisors must select and require employees to use appropriate hand protection when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts, punctures, bruises, amputations or lacerations; severe abrasions; punctures; chemical burns; thermal burns and harmful temperature extremes, or electrical dangers.

Some factors that may influence the selection of protective gloves in the workplace are:

- Type of chemicals handled
- Nature of contact (total immersion, splash, biohazard, etc.)
- Duration of contact
- Area requiring protection (hand only, forearm, arm)
- Grip requirements (dry, wet, oily)
- Size and comfort
- Abrasion resistance requirements

Gloves are made in four groups of materials:

- Leather, canvas, or metal mesh gloves
- Fabric and coated fabric gloves
- Chemical and liquid resistant gloves
- Insulating rubber gloves
- Earmuffs

The manager shall base the selection of the appropriate hand protection on evaluation of the performance characteristics of the hand protection relative to the tasks to be performed, conditions present, duration of use and the hazards and potential hazards identified.

Protective gloves are to be inspected before each use to make sure that they have not been made ineffective in any way. Any gloves found with impaired protective ability should be discarded and replaced.

## **Body Protection:**

Where engineering controls cannot eliminate bodily injury or exposure, appropriate body protection is to be worn while employees perform their jobs. Examples of workplace hazards that could require the use of body protection are:

- Temperature extremes
- Splashes from hot liquids or molten metal or other hot liquids
- Hazardous chemicals
- Potential impacts from machinery and materials

Managers are to select the appropriate body protection and make sure officers wear provided appropriate body protection based on hazards identified in the work place and the potential body exposure. Examples of body protection include:

- Jackets
- Coveralls
- Lab coats
- Vests (e.g. high visibility vests)
- Full body suits
- Surgical gowns
- Aprons

In order to prevent exposure to identified hazards, especially toxic substances, biological hazards, or harmful physical agents, protective clothing should be carefully inspected before each use. It must fit properly and must function properly for the purpose for which it is intended.

## **Hearing Protection:**

Employee exposure to excessive noise depends on the several factors: the loudness of the noise as measured in decibels (dB); the duration of each employee's exposure to the noise; whether



employee's move between work areas with different noise levels; and whether noise is generated from one or multiple sources.

Depending on the noise exposure to be expected in the workplace employees must wear appropriate hearing protection to reduce the amount of noise that gets through the ears (noise attenuation). The type of hearing protection used will differ depending on the exposures and are to be chosen based on what is needed to reduce the employee's exposure to within acceptable limits. The Noise Reduction Rating (NRR) of different hearing protectors is to be used to estimate the attenuation effectiveness.

Some types of hearing protection are:

- Single-use earplugs (e.g. waxed cotton, foam silicone rubber or fiberglass wool)
- Pre-formed or molded earplugs
- Earmuffs

Depending on where the officers are working, hearing protection may only be required in certain areas of a facility, and depending on the noise level and duration of time in a high noise areas, sometimes double hearing protection may be needed.

Managers are to make sure employees are trained on how to properly install the hearing protection and if not a disposable single-use earplug, that employees know how to properly clean and inspect the devices used.

## **Summary:**

Hard hats, goggles, face shields, steel-toed shoes, respirators, aprons, gloves, and full body suits are all various forms of personal protective equipment (PPE) and should not be used as a substitute for engineering, work practice, and/or administrative controls. PPE should be used in conjunction with these controls to provide for employee safety and health in the workplace.

PPE includes all clothing and other work accessories designed to create a barrier against workplace hazards. The basic element of any management program for PPE should be an in-depth evaluation of the equipment needed to protect against the hazards at the workplace.

Management dedicated to the safety and health of employees should use that evaluation to set a standard operating procedure for personnel, and then train employees on the protective limitations of PPE, its proper use and maintenance.

Using personal protective equipment requires hazard awareness and training on the part of the user. Employees must be aware that the equipment does not eliminate the hazard. If the equipment fails, exposure will occur. To reduce the possibility of failure, equipment must be properly fitted, put on and removed properly, and maintained in a clean and serviceable condition.

Selection of the proper PPE for a job is important. Employers and employees must understand the equipment's purpose and its limitations. The equipment must not be altered or removed even though an employee may find it uncomfortable. In fact, sometimes equipment may be uncomfortable simply because it does not fit properly.

For example, many hazards can threaten the torso: heat, flames, splashes from hot metals and

liquids/chemicals, impacts, cuts, acids, and radiation. A variety of protective clothing is available: vests, jackets, aprons, gloves, coveralls, and full body suits.

Wool and specially treated cotton are two natural fibers that are fire-resistant, comfortable and adapt well to a variety of workplace temperatures. Duck, a closely woven cotton fabric, is good for light-duty protective clothing. It can protect against cuts and bruises on jobs where employees handle heavy, sharp, or rough material. Heat-resistant material, such as leather, is often used in protective clothing to guard against dry heat and flame. Rubber and rubberized fabrics, neoprene, and plastics give protection against some acids and chemicals.

It is important to refer to manufacturer's selection guides for effectiveness of specific materials against specific chemicals. Disposable suits of plastic-like or other similar synthetic material are particularly important for protection from dusty materials or materials that can splash. If the substance is extremely toxic, a completely enclosed chemical suit may be necessary. The clothing should be inspected to ensure proper fit and function for continued protection. And if reusable, that it is professionally cleaned. Do not allow officers to take PPE home to be cleaned.

## **Employee-Owned Equipment**

When employees provide their own equipment, the employer shall assure the adequacy, including the proper maintenance and sanitation, of such equipment.

## **Design**

All personal protective equipment must be of safe design and construction for the work to be performed.

## **Hazard Assessment and Equipment Selection**

Managers/Supervisors are required to assess the workplace to determine if hazards that require the use of PPE are present or are likely to be present. If hazards or the likelihood of hazards are found Managers/Supervisors must select and have affected employees use properly fitted PPE suitable for protection from existing hazards.

Managers/Supervisors must certify in writing that a workplace hazard assessment has been performed.

## **Defective and Damaged Equipment**

Defective or damaged personal protective equipment shall not be used. It shall be taken out of service, tagged, and either properly repaired or disposed of.

## **Training**

Before doing work requiring use of PPE, employees must be trained to know when PPE is necessary; what type is necessary; how it is to be put on and taken off, tested for proper installation, how and when it is to be worn; and what its limitations are, as well as know its proper care, maintenance, useful life, and disposal.

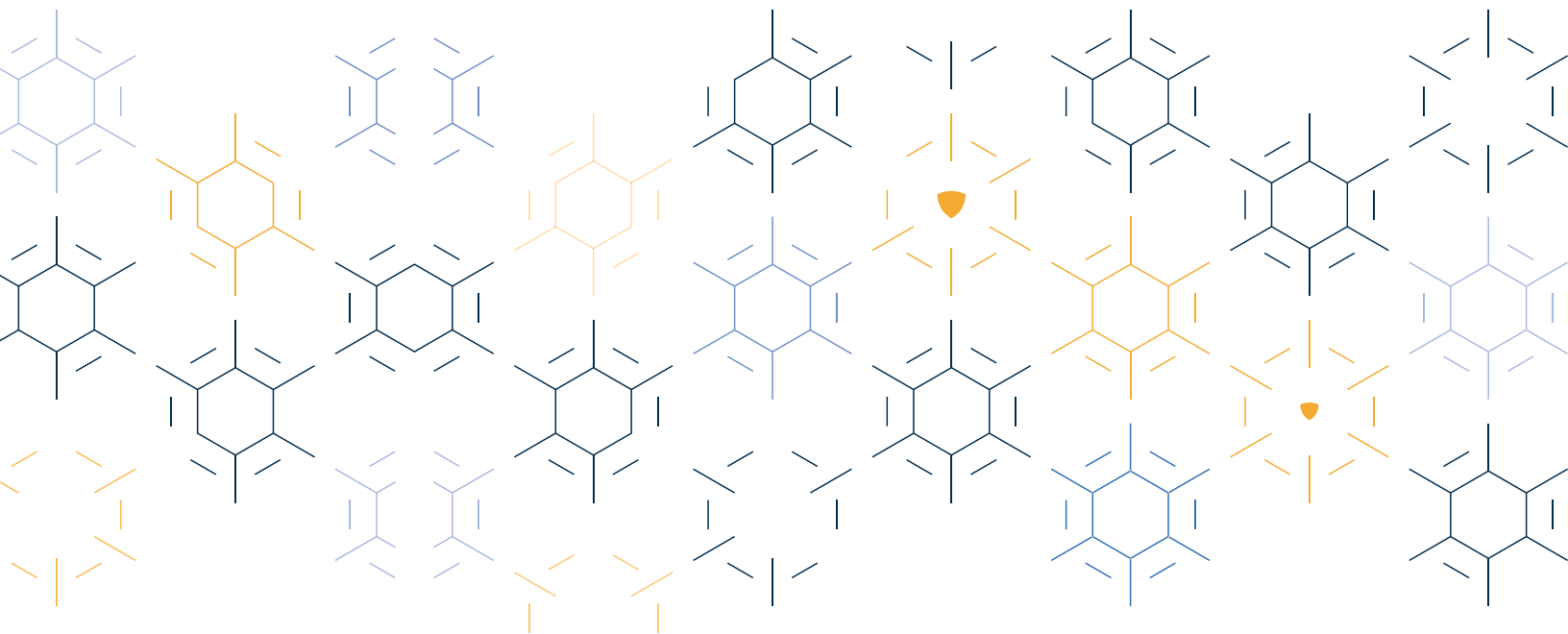
Managers/Supervisors are required to certify in writing that all training or retraining has been carried out and that employees understand it. Each written certification shall contain the name of each employee trained, the date(s) of training, and identify the subject certified.

## Conclusion

To have an effective PPE program First-line supervisors must be convinced of the hazard and must be held accountable for their employees' use of PPE. A safety program for new employees is a necessary part of any orientation program. An on-going safety program should be used to motivate employees to continue to use protective gear.

Teaming the correct PPE with a good training program can give the worker a large measure of safety where other controls are inadequate or impossible.

Personal protective equipment can be effective only if the equipment is selected based on its intended use, employees are trained in its use, and the equipment is properly tested and maintained, and worn.



8A PERSONNEL PROTECTIVE EQUIPMENT (PPE) TRAINING  
ACKNOWLEDGEMENT

PARAGON

I acknowledge that I have received information and training on Personal Protective Equipment when it is to be & necessary to be used, how to don, doff, adjust, & wear the equipment, and the limitations, care, & replacement/disposal of equipment which is to be worn when needed to protect myself per identified hazards at assigned facilities and defined by assigned roles and responsibilities as required per Federal OSHA Regulations 29 CFR 1910 Subpart I and Cal OSHA Title 8 Regulations CCR 3380, CCR 1514. CCR 8414, CCR 8605, CCR 6980, CCR 2320.1, and CCR 3408.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name:

cc: Personnel File

# How to Properly Put on and Take off a Disposable Respirator

WASH YOUR HANDS THOROUGHLY BEFORE PUTTING ON AND TAKING OFF THE RESPIRATOR.

If you have used a respirator before that fit you, use the same make, model and size.

Inspect the respirator for damage. If your respirator appears damaged, DO NOT USE IT. Replace it with a new one.

Do not allow facial hair, hair, jewelry, glasses, clothing, or anything else to prevent proper placement or come between your face and the respirator.

Follow the instructions that come with your respirator.<sup>1</sup>

## Putting On The Respirator



Position the respirator in your hands with the nose piece at your fingertips.



Cup the respirator in your hand allowing the headbands to hang below your hand. Hold the respirator under your chin with the nosepiece up.



The top strap (on single or double strap respirators) goes over and rests at the top back of your head. The bottom strap is positioned around the neck and below the ears. Do not crisscross straps.



Place your fingertips from both hands at the top of the metal nose clip (if present). Slide fingertips down both sides of the metal strip to mold the nose area to the shape of your nose.

## Checking Your Seal<sup>2</sup>



Place both hands over the respirator, take a quick breath in to check whether the respirator seals tightly to the face.



Place both hands completely over the respirator and exhale. If you feel leakage, there is not a proper seal.



If air leaks around the nose, readjust the nosepiece as described. If air leaks at the mask edges, re-adjust the straps along the sides of your head until a proper seal is achieved.



If you cannot achieve a proper seal due to air leakage, ask for help or try a different size or model.

## Removing Your Respirator



DO NOT TOUCH the front of the respirator! It may be contaminated!



Remove by pulling the bottom strap over back of head, followed by the top strap, without touching the respirator.



Discard in waste container. WASH YOUR HANDS!

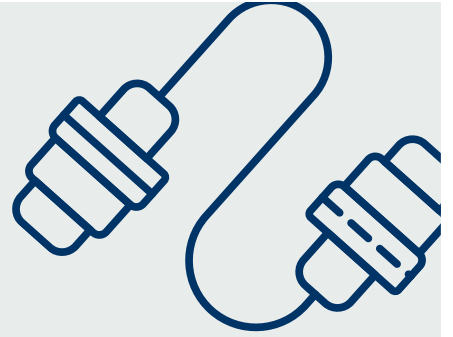
Employers must comply with the OSHA Respiratory Protection Standard, 29 CFR 1910.134 if respirators are used by employees performing work-related duties.

<sup>1</sup> Manufacturer instructions for many NIOSH approved disposable respirators can be found at [www.cdc.gov/niosh/nppt/topics/respirators/disp\\_part/](http://www.cdc.gov/niosh/nppt/topics/respirators/disp_part/)

<sup>2</sup> According to the manufacturer's recommendations

For more information call 1-800-CDC-INFO or go to <http://www.cdc.gov/niosh/nppt/topics/respirators/>





# Earplug Safety Training

## 01

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### Prepare the earplug.

No-roll foam and multiple-use earplugs do not require much preparation, but a very critical part of getting adequate protection with foam earplugs is the roll-down. With clean hands, roll the entire earplug into the narrowest possible crease-free cylinder.

When rolled down well, the earplug should be a little longer and noticeably stiffer. This allows the earplug to work its way around the first bend of the ear canal. Once the earplug is rolled very tightly, whether you use two hands or one, move it quickly to the ear canal for placement.

## 02

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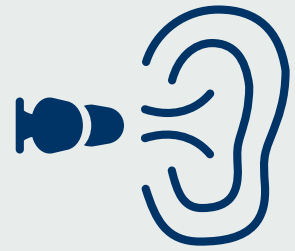
### Open the ear canal.

For all types of earplugs, the more open the ear canal, the easier it is to insert the earplug and achieve a proper fit. To open the ear canal, simply reach over your head and pull on the top of your ear. Usually, pulling up and back opens the canal best. However some ear canals open more fully by pulling out on the ear.

Source: 29 CFR 1910.95

PPE/EAR 022421

# 03



## Insert the earplug.

The earplug must be inserted well inside the ear canal to be effective. Once a roll-down foam earplug is prepared, quick insertion is a key to getting adequate attenuation.

Opening the ear canal properly makes insertion of the earplug much easier. A properly rolled foam earplug should basically lie on the ear canal floor and expand to seal the entire canal. Whether using single-use or multiple-use earplugs, a little movement or wiggle often is required to place the earplug in the correct location, well inside the ear canal.

Earplugs that are placed too near the entry to the ear canal are not as effective and can cause what's known as the Occlusion Effect. The Occlusion Effect is the amplification of body-borne sounds caused when you occlude or close off the ear canal. This can be demonstrated by singing the vowel sound "ee" while you lightly push on your tragus - that little flap at the opening of your ear canal. Most people hear the "ee" become much louder with their ear occluded. With hearing protectors, the Occlusion Effect is reduced by inserting the earplug deeper into the ear canal, or by stiffening the soft portion of the ear canal by using an earplug with more surface contact in the ear canal.

## Checking the Fit

### Visual Check

For earplugs with a stem (a firm protruding piece intended to be grasped by the user for insertion), only the tip of the stem should be visible to someone looking at you from the front, or when you view yourself in a mirror. All flanges of a flanged-earplug should be well inside the ear canal. For earplugs without stems, the ends of the earplugs should not be visible to someone looking at you from the front. An earplug that clearly is visible from the front is a warning sign of poor insertion.

Once all these steps have been followed you can feel confident that your hearing protection is properly fitted and you are ready to go to go into area where hearing protection is required.

### Acoustic Check

A hearing protector only is useful when it achieves an acoustic seal in the ear canal. An acoustic seal causes a very pronounced lowering of noise levels. Here is one way of checking the acoustic seal of an earplug. With earplugs inserted, cup your hands firmly over the ears and release. The earplugs should be blocking enough noise so that covering the ears with your hands results in no significant change in noise level.



# FOOT AND LEG PROTECTION

Protective footwear is one of the earliest forms of personal protective equipment that was widely accepted. It was worn long before it was mandated by OSHA standard 1910.136 for employees who face possible foot or leg injuries from falling or rolling objects or from crushing or penetrating materials.

Steel toed boots are the most common safety footwear in the construction industry. However, employees whose work involves exposure to hot substances or corrosive or poisonous materials must have protective gear to cover exposed body parts, including legs and feet.

If an employee's feet may be exposed to electrical hazards, non-conductive footwear should be worn. On the other hand, workplace exposure to static electricity may necessitate the use of conductive footwear.

Examples of situations in which an employee should wear foot and/or leg protection include:

- When heavy objects such as barrels or tools might roll onto or fall on the employee's feet
- Working with sharp objects such as nails or spikes that could pierce the soles or uppers of ordinary shoes
- Exposure to molten metal that might splash on feet or legs
- Working on or around hot, wet or slippery surfaces
- Working where electrical hazards are present

PPE/FT 030421

Safety footwear must meet ANSI minimum compression and impact performance standards in ANSI Z41-1991 (American National Standard for Personal Protection-Protective Footwear) or provide equivalent protection.

All ANSI-approved footwear has a protective toe and offers impact and compression protection. But the type and amount of protection is not always the same. Different footwear protects in different ways. Check the product's labeling or consult the manufacturer to make sure the footwear will protect the user from the hazards they face.

## Proper Protection

- Leggings protect the lower legs and feet from heat hazards such as molten metal or welding sparks.
- Leg gaiters provide protection from brush and snake bites.
- Metatarsal guards protect the instep area from impact and compression. Made of aluminum, steel, fiber or plastic, these guards may be strapped to the outside of shoes.
- Toe guards fit over the toes of regular shoes to protect the toes from impact and compression hazards. They may be made of steel, aluminum or plastic.
- Combination foot and shin guards protect the lower legs and feet, and may be used in combination with toe guards.
- Safety shoes have impact-resistant toes and heat-resistant soles that protect the feet against hot work surfaces common in roofing, paving and hot metal industries.

## Electrically Conductive Shoes



Electrically conductive shoes provide protection against the buildup of static electricity. Employees working in explosive and hazardous locations such as explosives manufacturing facilities must wear conductive shoes to reduce the risk of static electricity buildup on the body that could produce a spark and cause an explosion or fire. Foot powder should not be used in conjunction with protective conductive footwear because it provides insulation, reducing the conductive ability of the shoes. Silk, wool and nylon socks can produce static electricity and should not be worn with conductive footwear. Conductive shoes must be removed when the task requiring their use is completed.

**Note: Employees exposed to electrical hazards must never wear conductive shoes**

## Electrical Hazard, Safety-Toe Shoes

Electrical hazard, safety-toe shoes are nonconductive and will prevent the wearers' feet from completing an electrical circuit to the ground. These shoes can protect against open circuits of up to 600 volts in dry conditions and should be used in conjunction with other insulating equipment and additional precautions to reduce the risk of an employee becoming a path for hazardous electrical energy. The insulating protection of electrical hazard, safety-toe shoes may be compromised if the shoes become wet, the soles are worn through, metal particles become embedded in the sole or heel, or employees touch conductive, grounded items.



## Foundry Shoes

In addition to insulating the feet from the extreme heat of molten metal, foundry shoes keep hot metal from lodging in shoe eyelets, tongues or other shoe parts. These snug-fitting leather or leather-substitute shoes have leather or rubber soles and rubber heels.

All foundry shoes must have built-in safety toes.

PPE/FT 030421

# CARING FOR YOUR PROTECTIVE FOOTWEAR

## Keep Them Clean



After each use, safety footwear should be sprayed off with a hose; dipped in water; or cleaned with soap, water and a cloth or brush, depending on the type of shoes and how dirty they are. For full-grain leather, clean with a damp cloth or sponge and a mild detergent. Cleaning footwear not only protects the shoe from deterioration but also makes it easier to detect signs of physical damage.

Cleaning also helps performance, especially in the case of slip-resistant shoes. Mud and dirt should be cleaned from the bottom of slip-resistant footwear so they maintain their traction.

If you wear safety footwear made with leather, experts advise using the following items to prevent drying out and cracking:

- Shoe Grease
- Boot Oil
- Other Moisturizing Cream

## Keep Them Supple

## Inspect Them



Safety footwear should be inspected prior to each use.

Shoes and leggings should be checked for wear and tear. This includes looking for cracks or holes, separation of materials, or worn tread. The soles of shoes should be checked for pieces of metal or other embedded items that could present electrical or tripping hazards.

If something heavy is dropped on impact resistant footwear and the steel cap is dented, the footwear should be replaced.

# HAND PROTECTION



Not many years ago, workers considered it a sign of durability and hardiness to not wear gloves when performing tasks in the workplace. Most never considered wearing gloves to keep a better grip on tools, prevent knuckle busters, cuts and burns, or just to keep their hands clean. This attitude is often still a problem in today's workforce. Hand injuries, including injury to fingernails and fingers, are often written off as first-aid usage and near-misses. That is why OSHA created standard 1910.138 outlining the general requirements employers should follow when providing PPE equipment for hand protection to employees in the construction, industrial, and service fields.

OSHA standard 1910.138 requires that an employer shall provide, and require a worker to use, suitable and properly fitted hand or arm protection to protect the worker from injury to the hand or arm, including: (a) injury arising from contact with chemical or biological substances; (b) injury arising from exposure to work processes that result in extreme temperatures; (c) injury arising from prolonged exposure to water; and (d) puncture, abrasion or irritation of the skin.

## Types of Protective Gloves

There are many types of gloves available today to protect against a wide variety of hazards. The nature of the hazard and the operation involved will affect the selection of gloves. It is essential that employees use gloves specifically designed for the hazards and tasks found in their workplace because gloves designed for one function may not protect against a different function even though they may appear to be an appropriate protective device.

The following are examples of some factors that may influence the selection of protective gloves for a workplace.

- Type of chemicals handled
- Nature of contact (total immersion, splash, etc.)
- Duration of contact
- Area requiring protection (hand only, forearm, arm)
- Grip requirements (dry, wet, oily)
- Thermal protection
- Size and comfort

Gloves are made from a variety of materials and are designed for many types of workplace hazards.

PPE/HP 022521



## Leather, Canvas or Metal Mesh Gloves

Sturdy gloves made from metal mesh, leather or canvas provide protection against cuts and burns. Leather or canvas gloves also protect against sustained heat.

- Leather gloves protect against sparks, moderate heat, blows, chips and rough objects.
- Aluminized gloves provide reflective and insulating protection against heat and require an insert made of synthetic materials to protect against heat and cold.
- Aramid fiber gloves protect against heat and cold, are cut- and abrasive-resistant and wear well.
- Synthetic gloves of various materials offer protection against heat and cold, are cut- and abrasive-resistant and may withstand some diluted acids. These materials do not stand up against alkalis and solvents.

## Fabric and Coated Fabric Gloves

Fabric and coated fabric gloves are made of cotton or other fabric to provide varying degrees of protection.

- Fabric gloves protect against dirt, slivers, chafing and abrasions. They do not provide sufficient protection for use with rough, sharp or heavy materials. Adding a plastic coating will strengthen some fabric gloves.
- Coated fabric gloves are normally made from cotton flannel with napping on one side. By coating the unnapped side with plastic, fabric gloves are transformed into general-purpose hand protection offering slip-resistant qualities. These gloves are used for tasks ranging from handling bricks and wire to chemical laboratory containers.

## Chemical and Liquid Resistance Gloves

Chemical-resistant gloves are made with different kinds of rubber: natural, butyl, neoprene, nitrile and fluorocarbon; or various kinds of plastic: polyvinyl chloride (PVC), polyvinyl alcohol and polyethylene. These materials can be blended or laminated for better performance. As a general rule, the thicker the glove material, the greater the chemical resistance but thick gloves may impair grip and dexterity, having a negative impact on safety.



PPE/HP 022521

## Types of Chemical Resistant Gloves

Butyl gloves are made of a synthetic rubber and protect against a wide variety of chemicals, such as peroxide, rocket fuels, highly corrosive acids (nitric acid, sulfuric acid, hydrofluoric acid and red-fuming nitric acid), strong bases, alcohols, aldehydes, ketones, esters and nitro-compounds. Butyl gloves also resist oxidation, ozone corrosion and abrasion, and remain flexible at low temperatures. Butyl rubber does not perform well with aliphatic and aromatic hydrocarbons and halogenated solvents.

Natural (latex) rubber gloves are comfortable to wear, which makes them a popular general-purpose glove. They feature outstanding tensile strength, elasticity and temperature resistance. In addition to resisting abrasions caused by grinding and polishing, these gloves protect employees' hands from most water solutions of acids, alkalis, salts and ketones. Latex gloves have caused allergic reactions in some individuals and may not be appropriate for all employees. Hypoallergenic gloves, glove liners and powderless gloves are possible alternatives for employees who are allergic to latex gloves.

Neoprene gloves are made of synthetic rubber and offer good pliability, finger dexterity, high density and tear resistance. They protect against hydraulic fluids, gasoline, alcohols, organic acids and alkalis. They generally have chemical and wear resistance properties superior to those made of natural rubber.

Nitrile gloves are made of a copolymer and provide protection from chlorinated solvents such as trichloroethylene and perchloroethylene. Although intended for jobs requiring dexterity and sensitivity, nitrile gloves stand up to heavy use even after prolonged exposure to substances that cause other gloves to deteriorate. They offer protection when working with oils, greases, acids, caustics and alcohols but are generally not recommended for use with strong oxidizing agents, aromatic solvents, ketones and acetates.

## Care of Protective Gloves

Protective gloves should be inspected before each use to ensure that they are not torn, punctured or made ineffective in any way. A visual inspection will help detect cuts or tears but a more thorough inspection by filling the gloves with water and tightly rolling the cuff towards the fingers will help reveal any pinhole leaks.

Gloves that are discolored or stiff may also indicate deficiencies caused by excessive use or degradation from chemical exposure. Any gloves with impaired protective ability should be discarded and replaced.

Reuse of chemical-resistant gloves should be evaluated carefully, taking into consideration the absorptive qualities of the gloves. A decision to reuse chemically-exposed gloves should take into consideration the toxicity of the chemicals involved and factors such as duration of exposure, storage and temperature.



# Hard Hat Safety Measures



## History

Hard hat use started in the early 20th century when protective caps began being used for worker protection during the Hoover Dam (1931) and Golden Gate Bridge (1933) construction projects. Hard hat use expanded to mining and shipyard operations shortly after. Since then, hard hats have become a staple for workplace safety and protection. OSHA now mandates that anyone in danger of an impact head injury, falling or flying objects, or electrical shock and burns, should be protected by a protective helmet (OSHA 1910.135).

Nowadays, people across all industries use hard hats, rendering them one of the most commonplace, yet easily overlooked, pieces of personal protective equipment (PPE). Head protection has been mandated by OSHA since 1974, and the use of Hazard Assessments to aid PPE choice was added to the standard in 1994.

As with any PPE, hard hats are only as effective as the user makes them. This training will go into basic hard hat anatomy, general inspection criteria, common misconceptions, and how to care for your hard hat.

## Hard Hat Anatomy

The two major parts of a hard hat, the shell and the suspension, both require inspection during assembly and before each use. To provide maximum protection, your suspension and helmet sizes must match in order for your helmet to fit securely on your head (MSA 2010).

### Shell

The protective "exoskeleton" of the hard hat, the shell is the layer that shields your head from impact, splashes, and sun rays.

### Suspension

The suspension is the adjustable "head harness" that keeps the shell in place. A firm and snug fit ensures the helmet stays in place when confronted with variable work conditions.



## Types & Classes

Hard hats have different "Types" and "Classes" to help you identify what they are designed to protect you against.

Type I - Designed to protect workers from falling objects and impact that strikes the top of a helmet from above.

Type II - Designed to protect from blows and objects coming from the side or laterally. Protection extends to the front, back, side, and top. These are tested for off-center penetration resistance and chin strap retention.



**Electrical**  
Can withstand 20,000 volts of electricity.



**General**  
Can withstand 2,200 volts of electricity.



No protection from electric shock.



## General Inspection Rules

Before and after each use, every hard hat should be inspected for any wear or damage that might have accrued. A general inspection process should be:

1

Look at the shell of the hat for any breakage, cracks, crazy patterns, discoloring, chalky appearance, or anything that appears out of the norm.

3

Ask the worker wearing the hat if any impact or penetration occurred during their time using it.

2

Inspect the suspension for loss of flexibility, cracks, breaks, frays, or damaged stitching.

4

If any of these conditions exist, replace the suspension or shell immediately (MSA 2010).

## Common Misconceptions

Wearing a hard hat doesn't make you invincible, and downplaying the importance of wearing one can potentially cost you your life. These are some of the common misconceptions:

### Myth

*"I can wear a ball cap underneath my helmet."*

### Reality

No matter how tempting it is to support your favorite team, wearing a baseball cap underneath your hard hat can seriously interfere with your suspension.

### Myth

*"My hard hat is built to outlive me."*

### Reality

Helmets do not last forever. They eventually wear down due to exposure. The recommendation is that the entire helmet should be replaced every 5 years. The suspension may have to be replaced more often.

### Myth

*"The prettier the helmet, the better."*

### Reality

Although a decorated helmet may impress your coworkers, keep it to your car and outside-of-work attire. Your hard hat is not the place to decorate with paint or stickers. Chemicals found in paint or sticker adhesives can damage the shell and prevent you from seeing cracks or damage underneath.

# How to Care for Your Helmet



Regularly scheduled maintenance sessions with your helmet make all the difference. Follow these steps to make sure your helmet is well cared for.

## **Clean Your Helmet Regularly**

As often as you inspect it, which should be with every use. Avoid harsh detergent; use mild soap and warm water when cleaning it.

**Avoid dropping, throwing, or using your helmet to sit on or as support.** Safety rated hard hats are **not to be used as a vehicular or sports helmet.**

**Never store personal belongings,** such as cigarettes or earplugs, in between the suspension or shell. These objects can transmit a large force to the head and neck, causing serious injury or death.

When you're done with your helmet for the day, **store it in clean, dry area** that does not exceed 120 degrees Fahrenheit.

**Completely avoid using paints, solvents, or hydrocarbon-type cleaners** (ex: M.E.K., thinner, gasoline, kerosene). These substances can cause unnoticeable damage.



PPE/HH 022421

**PARAGON**  
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# High Visibility Safety Apparel

**High-visibility safety apparel (HVSA) is needed if you work when there is low light and poor visibility**, especially if you are working around moving vehicles. High-visibility items allow you to be seen by the drivers of those vehicles sooner and more readily. This fact increases your safety at work. The **human eye responds best to large, contrasting, bright or moving objects**. Worker visibility is enhanced by high color contrast between clothing and the work environment against which it is seen.

Work conditions that reviewed for indication that HVSA is needed:

- The type and nature of the work being carried out - including the tasks of both the HVSA wearer and any drivers.
- Workers may be exposed to heat and/or flames (if so, flame-resistant HVSA would be required).
- Work conditions, such as indoor or outdoor work, temperature, work rates, traffic flow, traffic volume, visibility, etc.
- The workplace environment and the background workers must be seen in (e.g., is the visual area behind the workers simple, complex, urban, rural, highway, filled with equipment, cluttered).
- How long the worker is exposed to various traffic hazards, including traffic speeds.
- Lighting conditions and how the natural light might be affected by changing weather (sunlight, overcast sky, fog, rain, or snow).
- Factors that affect warning distances and times, such as the volume of traffic, the size of vehicles, their potential speeds, the ability to stop quickly, and surface conditions.
- If there are any engineering and administrative hazard controls already in place (e.g., barriers that separate the workers from traffic).
- Any distractions that could draw workers attention away from hazards.
- The sightlines of vehicle operators, especially when vehicles are operated in reverse.
- If certain jobs, or the function being done, need to be "visually" identifiable from other workers in the area.



PPE/HVSA 022421

# Fluorescent vs Reflective Materials

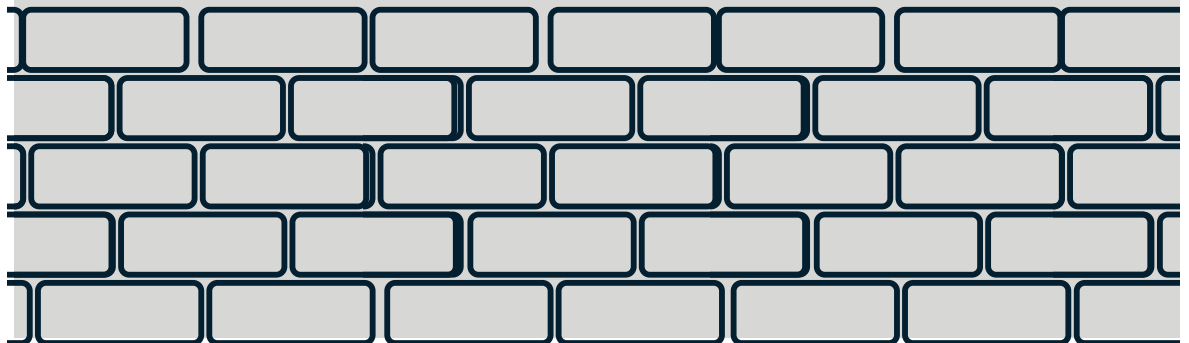


Fluorescent material takes a portion of invisible ultraviolet light from sunlight, and through special pigments, sends it back to the viewer as more visible light. This material only functions when there is a source of natural sunlight. Fluorescent materials enhance daytime visibility, especially at dawn and dusk, they provide the greatest contrast against most backgrounds.

In contrast, reflective materials light off of its surface so that is can be seen. It is typically defined as a material or object that has the ability to “throw back” light.

HVSA is regulated by OSHA Federal Regulation 23 CFR Part 634 which states that any employees in traffic and/or construction situations must wear HVSA clothing.

The amount and appearance of HVSA that must be worn is rated by ANSI/ISEA 107-2004.



PPE/HVSA 022421

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# Safety Eyewear

OSHA's standards for eye protection are intended to help prevent accidents that can lead to serious injuries, up to including blindness, caused by a variety of hazards. These hazards include flying particles, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation from welding.

Here are some of the major requirements of the OSHA standard 29 CFR 1910.133 for eye and face protection that help protect employees:



All eye protection devices, such as safety glasses and goggles must be marked that they meet or exceed the test requirements of ANSI Z87.1-1989. The marking is typically located somewhere on the frame of the glasses or goggles.



Safety glasses used to protect workers from flying objects must also have side protectors built into the design, or attachable side shield that meet the above referenced ANSI standard, to prevent objects and particle from injuring your eyes from the sides.



Workers needing corrective lenses must either wear approved safety glasses with prescription lenses and frames that meet or exceed the ANSI standard, or wear approved goggles designed to be worn over their regular prescription glasses.

Safety eyewear should be cleaned daily or more often as needed so that your vision is not obscured. Be sure not to lay your eyewear on abrasive surfaces, or set anything heavy on top of them.

**If your safety eyewear is damaged or broken  
notify your supervisor.**

PPE/EYE 022421





## SECTION 9

# Vehicle Safety

# Vehicle Safety

## Introduction

It is Paragon's policy to promote safe driving through careful hiring practices and employee training and screening. Drivers of any vehicles (personal, Paragon or client owned/leased/rented car truck, cart, Segway, etc.) must have a valid driver's license issued by the state or province in which he/she resides. The driver's license must be non-provisional and without any restrictions.

Employees assigned to drive a company/client owned or rented/leased vehicle while performing assigned duties must complete a Supplemental Driving Information Form: Information provided on the form must be accurate and complete, and the employee's name is to be entered exactly as it appears on their drivers' license. This form is to be kept in the employee's personnel file and checked carefully against a Motor Vehicle Record (MVR) check. In addition, each employee assigned to a driving assignment/post must successfully complete the Paragon Safe Driving Program which consists of:

- Viewing a video on safe driving,
- Passing a written exam, and
- Passing a road test.

A driver's license check is to be obtained from the local motor vehicle department/authority. Each District Office sets up its own procedures as to who will pay for the license check and who is responsible for obtaining it. Drivers' records are to be checked each year, and the license check must be received and reviewed before assigning the employee a vehicle.

An employee having any of the following will not be permitted to drive a company or client vehicle while on duty:

- Any two (2) moving violations within the preceding twelve (12) month period (tracked by the citation date)
- Any two (2) at-fault accidents within the preceding twenty-four (24) month period (tracked by the accident date)
- Any one (1) Driving Under the Influence (DUI) conviction within the preceding thirty-six (36) month period (tracked by the citation date).

*NOTE: If a driver has had only one moving violation during the preceding twelve (12) month period plus one at-fault accident within the prior twelve (12) months, a driver may still be certified if all other requirements have been met. If a driver is convicted of a DUI, the driver will lose all driving privileges for a period of thirty-six (36) months and then must be recertified before being permitted to drive any vehicle on company business.*

## Procedures

### A. Supplemental Driving Information/Driver's License Check

Complete a Supplemental Driving Information Form for each employee who will be assigned to drive a company or client owned, leased or rented vehicle.

The Supplemental Driving Information Form must be completed yearly for each employee assigned to



drive a company/leased or client vehicle. Driving records will be checked on an annual basis.

## **B. Drivers Road Test**

The Driver's Road Test should be performed by a supervisor using the Road Test Tally Sheet prior to assigning the employee a vehicle and at least once every three (3) years thereafter.

The completed road test is to be retained in the employee's personnel file.

## **C. Safe Driving Video**

A "Paragon Safe Driving Program" video is to be available in each District Office. All employees assigned to drive a company or client owned, leased, or rented vehicle are required to view this video along with taking a written exam upon initially being assigned to drive a vehicle and at least every three (3) years thereafter.

## **D. Drivers Safety Program Certification**

Upon completion of the above steps for a new employee, annual review of a current employee, or re-certification of an employee who has lost driving privileges while on duty due to accidents or moving violations, the dates shall be indicated on the Drivers Safety Program Certification, attach the Supplemental Driving Information, written exam results, and Driver's Road Test. All records are to be kept at the District Office.

If an employee is involved in an at-fault accident involving a third party, and the employee is not certified, the District Office may be required to pay the entire cost of a claim if any of the following was an associated factor in the accident:

- The District Office failed to obtain evidence of personal insurance on employees driving their own vehicle on Company business.
- If anyone other than an authorized Paragon employee is driving a company or client owned, leased, or rented vehicle (e.g. family members and friends).
- The employee was operating the vehicle while under the influence of alcohol and/or drugs (prescription or non-prescription) and the District Office knew or should have been aware of the situation.
- Driver's Certification is incomplete, including not completing and keeping on-file an annual Motor Vehicle Report (MVR).

## **E. Vehicle Inspection Form**

A vehicle inspection form must be completed at the beginning of each shift or first daily use of the vehicle.

If any items are noted that would make the vehicle unsafe to be driven, the vehicle will be taken out of service immediately, supervision is to be informed of condition, and the vehicle will not be permitted to be driven until repaired or replaced. No officer will be permitted to drive any vehicle that is not in safe working condition.

The local District Office is responsible for retaining completed vehicle inspection forms in accordance with the company retention policy.

# 9A VEHICLE INSPECTION FORM

Officer's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Vehicle No: \_\_\_\_\_ Vehicle Make/Model: \_\_\_\_\_ Year: \_\_\_\_\_

License Plate No.: \_\_\_\_\_ Expiration Date: \_\_\_\_\_

Last Service Date/Mileage: \_\_\_\_\_ Next Service Date/Mileage: \_\_\_\_\_

## Vehicle Inspection

ITEM CHECKED	START OF SHIFT	END OF SHIFT
Odometer Reading:	_____	_____
Fuel Level:	<input type="checkbox"/> E <input type="checkbox"/> ¼ <input type="checkbox"/> ½ <input type="checkbox"/> ¾ <input type="checkbox"/> F	<input type="checkbox"/> E <input type="checkbox"/> ¼ <input type="checkbox"/> ½ <input type="checkbox"/> ¾ <input type="checkbox"/> F
Fuel Costs:	\$ _____	\$ _____
Oil Level:	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED
Tire Tread:	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR
Tire Pressure:	PSI: _____	PSI: _____
Head Lights Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Brake Lights Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Emergency Lights Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Turn Signals Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Parking Brake Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Brake Condition:	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR
Brake Pedal Rubber Condition:	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR
Horn Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Transmission Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Spare Tire Available & Inflated:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Seats Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Seat Belts Functional:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Steering Function Normal:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Engine Coolant Level:	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED
Door Locking Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Wipers Working:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Washer Level:	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED	<input type="checkbox"/> FULL <input type="checkbox"/> ADDED
Interior Wiring Loose or Exposed:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Suspension Shocks Condition:	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR	<input type="checkbox"/> GOOD <input type="checkbox"/> FAIR <input type="checkbox"/> POOR
Interior Clean:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Exterior Clean:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO

# 9A VEHICLE INSPECTION FORM

## Equipment Inventory

	RECEIVED	RETURNED
Gas Cards:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Car Key:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Maintenance Card:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Insurance ID Card:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Vehicle Registration:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
GPS:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
GPS Charging Cord:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

	RECEIVED	RETURNED
TOCO Pipe:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Patrol Key Rings:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Patrol Phone(s):	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Hands Free Set:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Client Patrol Book:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Blank Reports:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A
Flashlight:	<input type="checkbox"/> Y <input type="checkbox"/> N	<input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> N/A

*Note: In the comments section write MISSING and the item listed below if any items are missing. Or check N/A if item does not apply. Circle remarks beside any item which is or is not received in good order. Write any new item in comments that is not on the inventory list. All items indicated "No" or "Missing" must be explained.*

**Equipment Inventory Comments:** \_\_\_\_\_

\_\_\_\_\_

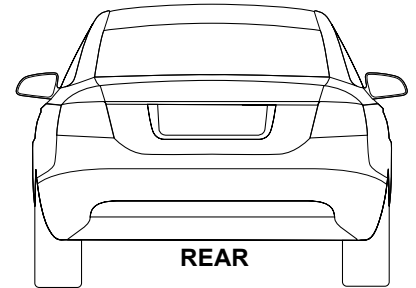
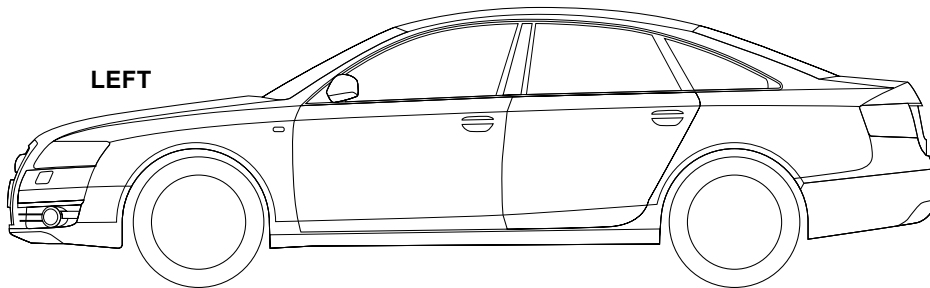
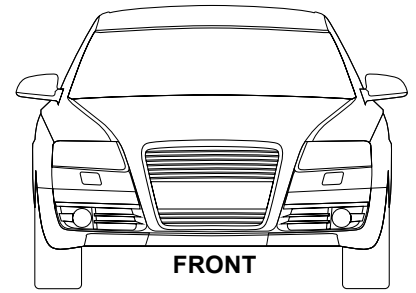
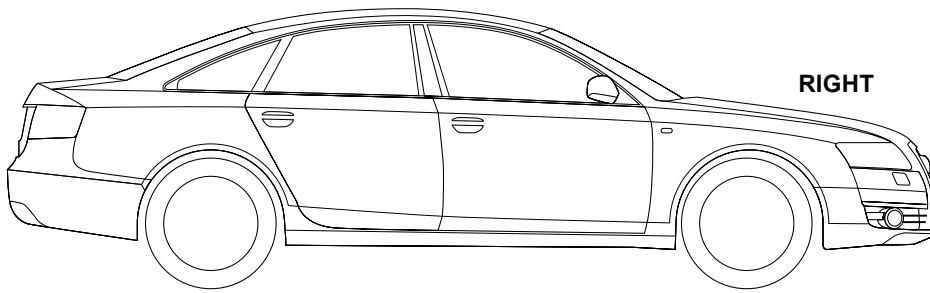
\_\_\_\_\_

## Damage Inspection

AREA CHECKED	START OF SHIFT	END OF SHIFT
Front Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Front Bumper Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Hood Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Rear Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Rear Bumper Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Roof Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Passenger Side Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Driver Side Damage:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Broken/Cracked/Chipped Windshield:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO
Broken/Cracked/Chipped Windows:	<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/> YES <input type="checkbox"/> NO

# 9A VEHICLE INSPECTION FORM

Damages New and Old Must Be Recorded



*Note: FOR PHYSICAL DAMAGE, conduct a visual inspection of the vehicle and indicate on the illustration the areas where any damage exists, e.g. dents, holes, chips, scratches, rust, etc. Give special attention to the bumpers, windshields (cracks or chips) and condition of the paint. Describe any present damage in the space in the comments section provided below.*

**Damage Comments:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

*Note: Forms are to be kept in each company and client vehicle and completed at the beginning & end of each shift or first daily use of vehicle. Inspection forms are to be turned in to the assigning office weekly and retained in a vehicle file.*

## Damage Comments:

All Paragon employees, per company policy, should conduct and fill out a Vehicle Inspection Form before operating any type of motorized vehicle for Paragon. In order to fill out the form safely there are some safety procedures that should be followed:

- Make sure the gear shift is in the **“PARK”** position.
- Make sure the engine is shut off, never leave keys in vehicle - officers are to take the keys with them.
- Make sure the emergency brake is engaged.
- While inspecting a bus or large truck the wheels should be chocked prior to the inspection.
- Conduct checks in a secure/safe place that is not a hazard to traffic.
- Wear eye protection and some type of surgical or heavy duty gloves whenever checking oil or other fluid levels.
- Never check radiator fluid levels when the engine is hot.
- Report all unsafe conditions to supervision and **do not** operate any vehicle deemed to be unsafe.

# 9B Cart Safety Training Program

## Safety and Compliance Statement

It is the intent of Paragon Systems to provide a safe working environment for all employees. Employees operating Low Speed Vehicles/Security Carts (e.g. Golf Carts) must be trained in the safe operation of the each type of security cart that will be driven, authorized to drive the security cart(s), and constantly be aware of others when driving as a part of their duties.

This training program is designed to meet all the requirements for the Cal OSHA requirements under the Title 8, California Code of Regulations, Section 3668, and the Federal Government Department of Labor regulation CFR 1910.178, which includes but is not limited to the following:

- Knowledge of all operating instructions
- Difference between automobiles and security carts
- Security cart controls and instrumentation and how they work
- Engine/motor operations
- Steering and turning
- Visibility
- Lights
- Vehicle stability and capacity
- Operating limits
- Refueling or recharging of batteries, and
- Emergency operations

## Introduction

Certain guidelines and rules have been set up regarding the use of the security carts; these guidelines and rules must be followed and are indicated in this document. Anyone found ignoring the rules and/or abusing the security carts may lose access to the security carts and be limited to foot patrols and disciplinary action may be taken up to and including termination.

If your shift and/or client site is assigned a security cart for use and the security cart is unavailable and/or out of service the Security Officer must perform his/her duties on foot.

Each Low Speed Vehicle/Security Cart operator will need to conduct a vehicle inspection and complete a security cart inspection sheet prior to security cart use. New damage and/or accidents shall be reported to your supervisor immediately. If during or after the security cart inspection has been completed the operator deems the security cart unsafe or not in safe working condition, the security cart steering wheel should be tagged with "Do Not Operate" and the supervisor should be notified. The cart is not to be returned to service until repaired or replaced.

## **Operating Instructions**

Paragon services a multitude of client sites with differing Low Speed Vehicles/Security Carts therefore operating instructions will be detailed by your supervisor. This may include a review of the Low Speed Vehicle/Security Cart manual that should come with the security cart and be on file.

### **Automobiles versus Security Carts**

The Supervisor will review the differences between automobile and security carts with the Officers to include but not limited to: speed, braking, turning capacity, stability, center of gravity, additional hazards, etc.

### **Security Cart Controls and Instrumentation**

Since many of the Low Speed Vehicles/Security Carts that are utilized by the field employees are different the Supervisor will review the following security cart controls: headlights, flashers, gas, brake, steering wheel, rear view mirrors, windshield wipers, gears (reverse/forward), ignition, turn signals, etc.

### **Engine/Motor Operations & Refueling or Recharging of Batteries**

When the security cart is not in use, Officers are to place the security cart control lever in the “Neutral” position and remove the key. The keys are never to be left in the security cart at any time when it is unattended.

If the security cart will be out of use for an extended period of time it should be taken to the designated location for the recharging of its battery. The supervisor will review the procedures for the appropriate way to hook up and recharge the battery with all approved drivers.

If the security cart is gasoline powered, designated areas are to be established for refueling and proper procedures for refueling will be reviewed with all approved drivers.

### **Steering, Turning, Vehicle Stability, and Capacity**

While steering a Low Speed Vehicle/Security Cart is much like driving a vehicle; drivers must still be aware that a security cart is often much shorter than a vehicle and the same height which can decrease their stability. Operators should in all cases refrain from making any sharp turns or movements that can potentially overturn the security cart. Safer methods, such as making a three point turn in small spaces, should be utilized for the Officer's safety.

### **Security Cart Capacity**

In most cases Officers utilize a Low Speed Vehicle/Security cart for their patrols wherein they are not normally required to carry passengers. If however officers are permitted to transport passengers as part of their roles & responsibilities, it should be noted that there should never be more passengers than there are seatbelts. The seats/benches in the Low Speed Vehicle/Security Cart should carry no more than two individuals per seat/bench. All passengers must be seated in the vehicle, no standing

or hanging off the vehicle is permitted/tolerated. Any loose materials and/or riders should be properly secured prior to the vehicle being utilized.

## **Visibility**

Drivers and riders must make sure they have proper visibility at all times while operating the security cart; and shall remove any bulky items that could or would block the view for safe operation.

## **Lights**

If a security cart is equipped with headlights, they should be utilized at all times to insure safe operation. Any security cart that is not equipped with headlights should not be driven at night or in dark/unlighted areas of a facility or site at any time.

## **Operating Limits**

The Low Speed Vehicle/Security Cart should not be operated above 15 MPH or above site posted speed limits whichever is lower. Operators should always consider the terrain, weather conditions, pedestrians and vehicular traffic when determining the appropriate speed for the vehicle. Whenever in any crowded pedestrian area the operators must stop for any pedestrians and then only proceed at a slow pace after the area has cleared. Pedestrians always have the right of way.

## **Emergency Operations**

Occupants of the security cart should be made aware of emergency procedures for evasion and escape procedures due to a serious accident.

## **Motorized Patrolling**

Officers are representing the client and Paragon while driving the Low Speed Vehicle/Security Cart. Therefore Officers must always maintain a neat and clean appearance, always behave courteously, and observe all rules at all times.

## **Additional Safety Rules**

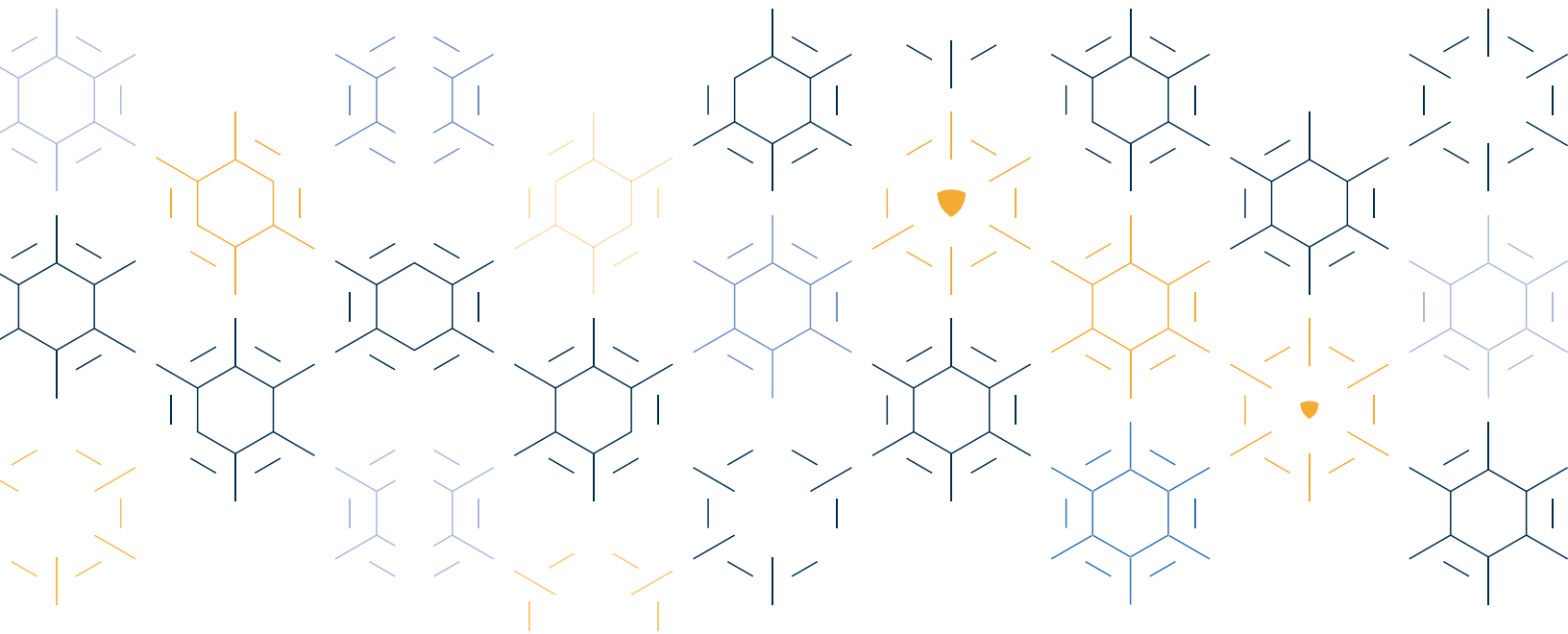
### **Operators Must:**

- Be certified to drive the security carts
- Notify supervisors of any accidents and/or damages immediately
- Successfully complete and meet the Paragon Safe Driving Program and its requirements. If an operator's driver's license is suspended or revoked at any time they must notify their supervisor immediately
- Never exceed the posted speed limits or operate above 15 MPH whichever is lower
- Never drive on the sidewalks/walkways unless approved by Post Orders



- Slow down when approaching a crosswalk
- Come to a complete stop at the crosswalk if someone is crossing or attempting to cross the street. The pedestrian always has the right of way
- If applicable, utilize windshield wipers in conjunction with headlights when raining
- If applicable, utilize four way flashers any time you need to use your security cart as a barrier device
- Use turn signals or hand signals when making a turn
- Fasten seat belts before moving the security cart
- Come to a complete stop before using a hands free device, any radio or cell phone. No communication is to be done while driving
- Keep both hands on the steering wheel at all times
- Set the emergency brake every time the security cart is exited
- Do not park security carts where they will block emergency equipment, pedestrian aisles, doorways, intersections, or the normal traffic flow
- Insure that they and all passengers keep hands, arms, legs, and feet within the confines of the security cart at all times when the security cart is in motion
- Never back up the security cart without looking to see what is behind, and honking the horn before moving
- Never pull through blind intersections without slowing down and/or stopping to make sure there is no approaching traffic or pedestrians

Once training has been completed, Officers are to sign Paragon's Cart Operator's Agreement Form and form is to be submitted to the HR Department.



## 9B.1 CART OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating Low Speed Vehicle/Security Cart. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the Low Speed Vehicle/Security Cart Program and will adhere to all the requirements of this program. I acknowledge that I have received information and training on Power Industrial Trucks/Security Carts: US Department of Labor OSHA regulation CFR 1910.178 and Cal OSHA Title 8 Regulations, CCR 3668 as required by the California Occupational Health and Safety Administration. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between automobiles and security carts
- Security cart controls and instrumentation and how they work
- Engine/motor operations
- Steering and turning
- Vehicle stability and capacity
- Visibility, lights
- Operating limits
- Refueling or recharging of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists

Employee Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Instructor/Trainer Name: \_\_\_\_\_ Date: \_\_\_\_\_

cc: Personnel File

9B.2 PIT CART TRAINING ACKNOWLEDGEMENT

PARAGON

I acknowledge that I have received information and training on the use of a Power Industrial Truck/ Security Cart as required per the Federal OSHA regulation CFR 1910.178 and Cal OSHA Title 8 Regulation CCR 3668.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

## 9B.3 CART PRE-OPERATION OR DAMAGE CHECKLIST

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Cart No.: \_\_\_\_\_

*Note: All items checked in Fix, N/A, or Damaged boxes are to be described in full detail in Officer Comment section below.*

Check Emergency Lights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Headlights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Turn Signals	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Wipers	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tires	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tire Pressure	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Seat Belts	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Interior	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Exterior	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Horn	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Rear View Mirror	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Side Mirrors	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Windshield	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Battery	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Cart Battery Fully Charged	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Electrical Outlet	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Reflective Vests Available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

**Officer Comments:** *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above. (Use back if more space is needed)*

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## 9C Segway Personal Transporter Overview

The following document is focused on creating formal written guidelines and instructions for the development and deployment of a Segway® Personal Transporter (Segway PT) program which can be used and customized as required.

This document addresses topics common to developing and implementing a Segway PT program and is to be modified to address additional situations or operations protocol specific to Paragon or the client, or to remove components not applicable to the operational environment.

### Segway Personal Transporter Program

#### Introduction

The objective of this document is to provide guidance for participants in the operation and maintenance of a successful Segway Personal Transport (Segway PT) program.

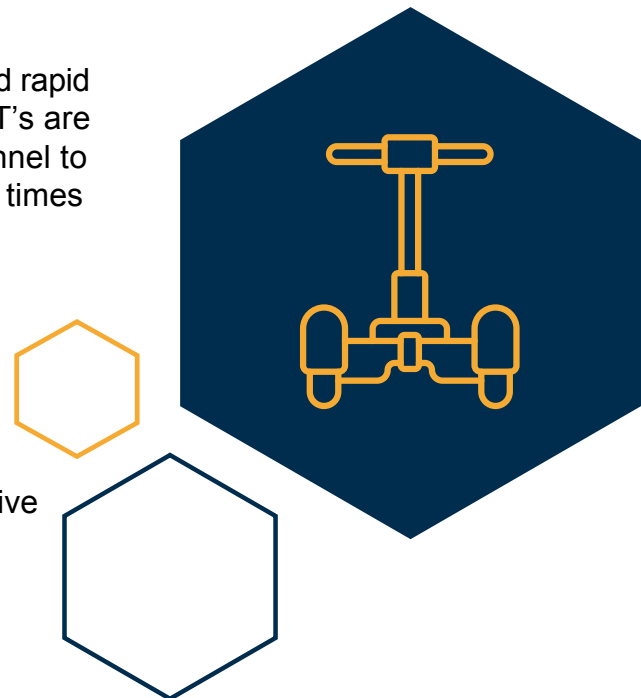
#### Purpose

The Segway PT is an alternative transportation device to satisfy a recognizable security patrol need at certain facilities. The Segway PT is a battery operated, emission free mode of transportation that can help reduce overall vehicle investment costs over traditional fuel based vehicles. The Segway PT equips security personnel with a quick response tool capable of carrying emergency supplies, providing personnel with a height advantage as they ride, and providing superior visual coverage of areas. Riding a Segway PT improves response time and covers a greater area more quickly than if traveling by foot. The Segway PT is designed for both indoor and outdoor patrols and it may be deployed for security patrols in shopping malls, airports, corporate and university campus settings and industrial buildings.

The use of a Segway PT provides increased security visibility and rapid response times to requests for security services as Segway PT's are extremely effective in reducing the time it takes security personnel to cover large areas. Improved statistics on service call response times facilitates an increase in community relations.

The Segway PT provides personnel with the ability to carry moderately heavy equipment for their assignments.

Security Segway PT riders will also be highly visible, representing a unique ability to reduce the opportunity for security incidents in and around the areas of their assigned active roving patrol routes.



## Structure and Staffing

### Segway PT Coordinator

A staff member is to be selected to oversee the Segway PT Program. This person would be considered the Segway PT subject matter expert for the facility and will be referred to as the Segway PT Coordinator. The responsibilities of the Segway PT Coordinator should include, but are not limited to:

- The selection of personnel who will participate in the Segway PT program
- The training requirements for Segway PT program participants
- Ensuring that only trained personnel operate department Segway PT's
- Ensure personnel proficiency levels are maintained through continual re-certification and On-the-Job training
- The supervision of maintenance and repair of the Segway PT's
- Assigning the Segway PT's to personnel, selected posts and special events
- Maintaining the Segway PT inventory
- Maintaining and updating the list of all Segway PT and Info Key serial numbers
- Tracking system usage, maintenance and warranty issues
- Being the liaison between the department and the authorized Segway account manager

### Segway PT Personnel

Segway PT personnel are those employees who have volunteered for, or have been selected for use of the Segway PT by the Segway PT Coordinator, and who have successfully met all of the criteria to safely operate a Segway PT unit. The criteria to be used for the selection of Segway PT personnel are as follows:

- Segway PT personnel will ride in a variety of lighting, terrain, and weather conditions and must be willing to ride in these conditions
- Personnel selected for the Segway PT program should be in good physical condition, be able to stand for long periods of time, have good hand/eye coordination, good reaction time, and fall within the recommended weight limits for riders and cargo
- The maximum payload of the Segway PT (rider, installed options, and other auxiliary equipment) is not to exceed 260 lbs., exceeding the 260 lb. payload may decrease rider safety, reduce the performance and increase the risk of damage to the Segway PT
- If the Segway PT Program Coordinator has any reservations about a person's physical condition or ability to safely operate a Segway PT, that person will not be permitted to operate a Segway PT unit until the issue is satisfactorily resolved with the Segway PT Coordinator

## Training and Requirements

### Segway PT Training

Segway PT training will be based on the type of unit purchased and to be or is being used at the specific facility where it will be driven, and also based on the specific unit options that are on the units

that will be driven. The following training must be completed by all officers before being permitted to drive a Segway PT unit to promote a safe operational environment, avoid accidents, prevent injuries, and reduce liability:

- All Segway PT program candidates must successfully pass all departmental Segway PT Training Classes
- For all Segway PT training sessions, the Segway PT Wireless Info Key should be set to beginner (Turtle) mode
- Training specific to the facility and the rider's job responsibilities will be required and facilitated by the Segway PT Coordinator
- Continuous On-the-Job training may be facilitated as needed by the Segway PT Coordinator

## Segway PT Equipment

The Segway PT is a battery powered Personal Transporter, and is classified as an Electric Personal Assistive Mobility Device (EPAMD). The standard Segway PT comes equipped with 2 Lithium Ion batteries, 2 Wireless Info Key™ controllers, a spare Info Key battery, 1 battery charging cable, 1 set of standard mats, a 3 mm and a 5 mm hex wrench, and a full set of documentation which includes the Segway PT Safety Video, the Segway PT Getting Started Manual, and the Segway PT Reference Manual.

The Segway PTs assigned to a location are to be identified with a unit ID number, and will be stored at designated locations within the facility when not in use. The units identifying number will be used when assigning units and for maintenance recording purposes.

The Segway PTs that are owned or leased by Paragon at a location are to be equipped with the following accessories which were approved at the time of installation:

- Pedestrian Beeper
- Upper reflective shield for Paragon Logo
- Lower reflective shield with SECURITY lettering
- Integrated lighting
- Gliding lights
- Cargo frames
- Warning backup beeper
- Charging cables
- If ordered with storage devices, the devices are to be lockable

If the Segway PT has auxiliary storages units, a spare battery charging cable should be carried with the unit.

Depending on the accessories that are provided with the units, the following items apply:

- If equipped with a pedestrian beeper, the audible warning device will be utilized as needed in crowded settings to alert pedestrians of the rider's presence
- If equipped with a handlebar bag and hard case bags, they may be utilized as a storage area for departmental supplies including but not limited to emergency equipment, supplies, paperwork, or other items required by the Officer during his/her shift



- If equipped with lockable hard cases the cases are to be locked at all times whenever the Segway PT is left unattended
- If provided with auxiliary lighting, lighting shall be used in low light settings for the safety of the rider and to increase the visibility of the rider

Only department-issued Segway PT's will be utilized for department use. Under no circumstances will personnel be allowed to use personal or privately owned Segway PT's for neither department duty, nor will department issued Segway PT's be allowed for private usage by any personnel.

No accessories or signage may be affixed to the Segway PT without the approval of the Segway PT Coordinator. To identify the unit as a Security vehicle, company logos, unit numbers, and signage will be affixed to each unit in a designated location as approved by the Segway PT Coordinator. No other logos, stickers, or identifying labels are to be attached to company units.

## **Segway PT Maintenance and Maintenance Reports**

Personnel shall inspect their assigned Segway PT at the beginning and end of each shift. This inspection shall include, but is not limited to:

- Adequate battery life for the assigned shift
- Damage
- Cleanliness
- Mats are securely attached to the Power Base
- Tire wear and pressure
- Foreign objects on the tires
- Properly secured and functioning accessories
- A spare Info Key battery located under the console trim piece
- Spare batteries for any installed accessories

See the Segway Pre-operation Inspection Checklist in Section 9(c)(1) of the Safety Manual.

Personnel shall report any discrepancies to the Segway PT Coordinator immediately. The Segway PT Coordinator shall place out-of-service any Segway PT that is damaged or functioning in an unsafe manner.

PT Coordinator must define what communications methods can and cannot be used to notify the Segway PT Coordinator of discrepancies.

The maintenance responsibilities of the Segway PT Coordinator are as follows:

- Maintaining an inventory of tools and spare parts required to perform maintenance on the Segway PT's
- Maintaining a log for each unit in inventory
- Training personnel to perform maintenance on the Segway PT
- The boundaries of what repairs are and are not allowed by personnel

# Segway Damage Injury Reports

## Damage Reports:

Operators involved in an incident that damages the Segway PT or other property, or results in an injury, will submit an Accident Report to the Segway PT Coordinator by the end of their shift. Recommendations of data to include in the report may consist of, but not be limited to:

- The operator at the time of the incident
- Time, date, and location of the accident
- The identifying number of the Segway PT involved in the accident
- The actual damage incurred
- Environmental factors leading to the accident (outside, inside, surface type, wet or dry conditions)
- How the accident occurred

The accident, along with any damage to the unit will also be noted in the unit's maintenance log.

## Internal Injury Reports:

Officers are to report all injuries immediately using the Paragon Officer/Employee Incident/ Injury Report to the District Office.

Injury Reports to Segway Inc.: If anyone using a Paragon Segway PT is involved in an accident, of if a Segway PT performs in a way that it is not intended to or in a way that it is not supposed to, contact Segway Customer Operations.

**Phone:** 1-866-4SEGWAY (1-866-473-4929)

**Fax:** 1-603-222-6001

**Email:** technicalsupport@segway.com,

**Website:** www.segway.com

## Uniforms and Equipment

Segway operators are to wear the following:

- Helmets are required to be worn at all times while using the Segway
- Wear high-visibility vest while driving the vehicle
- Wear appropriate footwear that protects your feet and provides adequate support and comfort. Sandals are not permitted
- Operators should avoid wearing any type of loose clothing, accessories, or equipment that could become entangled in the Segway PT's Handlebar or Lean Steer Frame and cause a hazard while riding. Check with supervision regarding the uniform of the day that will be permitted depending on weather inclement conditions e.g. heat, cold, rain, high winds etc.
- If an operator must wear a lanyard to carry credentials or any other object, a safety lanyard should be used in place of a standard lanyard

# Operations and Responsibilities

## Segway PT Operation

- Segway PT's shall be operated under control at all times and shall never be ridden outside of the operator's capabilities, outside the safety parameters specified by Segway Inc. in the Segway Getting Started and Reference Manuals, or on dangerous surfaces
- Using the Segway PT for any function except for its intended purpose is prohibited
- Segway PT's will be operated only by personnel who have successfully completed the Segway PT Training Class and who are approved by the Segway PT Coordinator
- When operating a Segway PT, the rider should always be aware of his/her surroundings (ground conditions, pedestrian traffic, etc.), and should only ride on approved routes
- Riding a Segway PT up or down curbs, escalators or stairs is prohibited; riders should always ride around obstacles, not over them
- Operators should always monitor the charge of the Segway PT's batteries and should not allow the batteries to run to depletion
- When the Info Key Controller indicates the Segway PT batteries charge level is 2 bars or less, the operator should return to a charging station to recharge the unit's batteries
- Operating a Segway PT while under the influence of alcohol, illegal drugs, or any medication that causes drowsiness is strictly prohibited
- Operating a Segway PT while fatigued is prohibited and operators should take regularly scheduled breaks to ensure that they are rested and alert at all times
- In the case the Segway PT unit will be used during a specific law enforcement situations the Site procedures will be followed & officers are to follow the instructions given by the AHJ.
- Officers utilizing Segway PT units will adhere to safe speeds based on where the units are being ridden and what situation and environments the unit is being used in. If pedestrian or other obstacles are present, speeds are to be greatly reduced
- Any Officer observing the misuse of a Segway PT by another operator shall report it to their supervisor immediately

## Segway PT Operator Responsibilities

Each operator is responsible for inspecting the Segway PT prior to its use and shall inspect their assigned Segway PT at the beginning and end of each shift. The inspection is to include items previously mentioned in this document and shall be documented and turned in at the end of each shift.

- The use of communications and listening devices (cell phone, two-way radios, headphones, etc.) should not be used while operating the Segway PT units. Officers are to stop before using these devices
- Officers are to maintain two hands on control devices whenever driving the units, Clipboards or other devices are to be stored in storage compartments until the unit is stopped, device retrieved, used and returned to storage compartment before proceeding to next destination unless a device is provided for holding the device is attached to the unit
- At NO time while operating a Segway PT will the consumption of food and beverages be permitted

- To prevent theft, the Segway PT units are to be secured at all times when leaving it momentarily (e.g. checking doors/areas on foot, lunch breaks, restroom breaks, etc.)
- When not in use (between shifts, overnight, etc.), the Segway PTs are to be returned to the designated storage area, and the keys and Info Key shall be secured and stored in the site designated location.
- In order to maintain optimum usage of the Segway PT units during an entire time of usage, the battery is to be charged as follows (while on a lunch break, between shifts, overnight, etc.). In addition, the unit is to be secured and charger cable hooked up to the unit whenever the charge level reaches 2 bars

Any questions regarding this policy shall be directed to the Segway PT Coordinator.



## 9C.1 SEGWAY PRE-OPERATION CHECKLIST

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Segway Unit No.: \_\_\_\_\_

*Note: All items checked in Fix, N/A, or Damaged boxes are to be described in full detail in Officer Comment section below.*

Check Battery Charge/Life	<input type="checkbox"/> OK	<input type="checkbox"/> Needs Chrg	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Headlights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Control Grips	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Mats Secured to Power Base	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tire Wear & Pressure	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check for Foreign Objects on Tires	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
All Exterior Accessories Secured	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Exterior	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Warning Beeper	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Spare Batteries for all Access	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Cleanliness	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Spare Info Key Battery in Place	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Charger Cable Available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Helmets Available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Reflective Vests Available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

**Officer Comments:** *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above. (Use back if more space is needed)*

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## 9C.2 SEGWAY PT OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating Segway Personal Transporter (PT) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the Segway Personal Transporter Program and will adhere to all the requirements of this program. I acknowledge that I have received information and training on the Segway unit. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between automobiles and Segway Personal Transporters
- Segway controls and instrumentation and how they work
- Engine/motor operations
- Steering and turning
- Vehicle stability
- Visibility, lights
- Operating limits
- Make eye contact with motorists and pedestrians; travel slowly when around pedestrians; and give the right-of-way to pedestrians.
- Recharging of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists
- Safety helmets will be provided by Paragon and worn while riding at all times.
- No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding a Segway PT for Paragon
- There will be no horseplay, racing, speeding, or misuse of the Segway PT at any time.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

cc: Personnel File

## 9D Bicycle Safety Program

Security bicycles are a part of patrolling services offered by Paragon. Officers may voluntarily use bicycles for patrol purposes; however Officers should complete the Paragon bicycle training course and sign the acknowledgement before riding a bicycle on any Company business. If Officers are ever in doubt of safety while riding a bicycle on the job, then it is best to contact their supervisor, not use the bicycle, and walk.

Patrol bicycles are intended for business use only and are not to be used for personal use.

All Paragon bicycles are intended for use by one person at a time.

Bicycles should follow the same rules as a vehicle, including but not limited to:

- Stopping at intersections
- Riding on the correct side of the road
- Yielding to pedestrians are just some of the requirements for bicycle riders

As the operator of a bicycle, Officer's cooperation and awareness is needed to maintain a safe environment for all employees and visitors. Officer safety is the main concern while operating a bicycle for purposes of Company business.

The Paragon bicycle program has three main elements:

- Operational safety and training
- Bicycle inspection and storage
- Personal Protective Equipment (PPE) for bicycle riders

### Operational Safety and Training Requirements

All Paragon Officers riding a bicycle on Company business need to understand that these bicycles shall not be ridden for personal use at any time, and that horseplay or misuse will not be tolerated by Paragon. Any employees engaged in the aforementioned behavior are subject to disciplinary action, including, but not limited to termination.

The key safety elements to follow when operating a bicycle on Company business are:

- Keeping your speed to under 5 miles per hour
- Traveling slowly around pedestrians and always yielding to them
- Making eye contact with both motorists and pedestrians
- Never weaving in and out of traffic or parked cars (always expect vehicle doors will open necessitating that an employee ride accordingly)
- Giving the right of way to pedestrians
- Riding in the same direction as vehicle traffic
- Obeying all safety and traffic signs and laws



Studies show the most common reason for bicycle accidents is riding on the wrong side of the street.

All Paragon bicycle riders should know and use the three (3) basic hand signals recognized on all US highways and roads.

- If making a left turn, lift left arm to shoulder height and hold it straight out pointing left
- To indicate a right turn, hold left arm out at shoulder height and bend forearm straight up pointing at the sky
- To stop or brake, hold left arm out at shoulder height and bend at the elbow with forearm pointing straight down to the ground

These are nationally recognized hand signals that serve as turn signals and brake lights for bicycle riders and should be used even when there are no visible vehicles around. Bicycle riders must make left and right hand turns the same way that vehicles do, by using the same turn lanes. It is important for bicycle riders to attempt to make eye contact with vehicle drivers and pedestrians, and to ride slowly around congested areas with pedestrians.

If a bicycle operator is riding at night, the bicycle must be equipped with a white headlamp reflector and red rear reflector. It is important to make sure all bike reflectors are working and are properly attached (a small flashlight is also prudent, but Officers are to stop the bicycle before using the flashlight). A small light mounted on the bicycle is also recommended.

All Paragon Bicycle Officers should come to a complete stop at intersections and stay to the right unless the employee is passing or turning.

OSHA regulations state that bicycle riders while in the course and scope of employment should have training in the “rules of the road” before they start utilizing the bicycles at work (this can be accomplished when bicycle operators learn the rules of the road portion of the Paragon Safe Driving Program).

All bicycle riders should maintain a safe distance between parked vehicles, cross all railroad tracks at a right angle, and always ride to the right if moving slower than traffic unless making a turn.

Bicycle Patrol Officers shall not drink or eat while riding, text or make calls while riding the bicycle, or ever be wearing headphones. Employees engaged in the aforementioned behavior are subject to disciplinary action, including, but not limited to termination.

One of the most important aspects of bicycle riding is to see and be seen. Officers are to ride defensively, and to always stay alert to obstacles within their path of travel.

## **Bicycle Inspection and Storage**

The Paragon bicycle pre-operation checklist should be performed before every bicycle riding shift, and any deficiencies should be reported to a supervisor immediately (no matter how small). All bicycle manufacturers’ maintenance recommendations should be followed. Officers are not to operate the bicycle if there are any deficiencies noted with the bicycle they have been assigned. Officers are to use another bicycle or perform foot patrols until any deficiencies can be repaired to the manufacturers’ specifications. The manufacturers’ instructions for bicycle maintenance are to be followed. And Officers are to check with their supervisor before customizing or making any changes to the bicycle.

Officers are to make sure the bicycle is properly sized and adjusted before any patrol. Bicycles are never to be left or parked in emergency fire lanes, in front of building exits, or on any sidewalk that provides a pedestrian, wheelchair or emergency exit. It is always preferred that a bicycle rack is used when parking if available. If the rider is going to be away from the bicycle for an extended period of time, it is suggested that the rider secure and lock the bicycle to a rack or secure object to avoid tampering and theft.

## Personal Protective Equipment for Bicycle Riders

OSHA regulations state that all bicycle riders operating bicycles in the course and scope of their employment should wear an authorized bicycle safety helmet (helmets should fit each individual rider properly) as well as a high-visibility safety vest (which is mandated for Paragon bicycle operators).

All bicycle riders should wear sturdy shoes and never operate a bicycle while wearing open-toed shoes. And bicycle riders should be aware of any loose clothing they are wearing, as loose clothing could potentially become caught in the moving parts of a bicycle. If wearing long pant/slacks using an elastic strap on the leg closest to the chain will keep the material from getting caught in the sprockets.

Officers are to always check with their supervisor before performing bicycle patrols if inclement weather is pending or occurring. PPE for inclement weather may be added as necessary. Rain gear if raining or cold weather gear if cold may be issued, or changes in uniform may be approved if the weather is extremely hot.

## Paragon Bicycle Certification Program

In order for Paragon employees to become certified bicycle patrol Officers all Paragon mandated training and safety protocols must be met and satisfactorily completed. In order to obtain certification all bicycle patrol Officers must go through:

- The training portion of the Paragon Safe Driving Program to effectively learn the “Rules of the Road”
- Classroom training and passing of the bicycle written test (with an 80% passing grade)
- Being able to properly complete the bicycle inspection form
- Demonstrating the proper way to wear all appropriate safety PPE
- A passing grade of 80% on the road test (to include a sufficient demonstration of hand signals)
- Sign the Officer Training Acknowledgement Form

All certified bicycle Officers for Paragon are to remember that they represent the Company and that their cooperation and awareness is needed to maintain a safe environment for all employees and visitors.



## 9D.1 BICYCLE INSPECTION SHEET

Date: \_\_\_\_\_ Time: \_\_\_\_\_

Bicycle Serial #: \_\_\_\_\_ Bicycle #: \_\_\_\_\_

Officer Checking out Equipment: \_\_\_\_\_

### Bicycle Inspection

It shall be the responsibility of any Officer using a Patrol Bicycle Unit to inspect that unit and its components/equipment prior to use. Personnel shall accurately indicate any damage or abnormality, as well as the presence of appropriate equipment in conformance with Company Bicycle Policies & Procedures. This form is to be completed on a DAILY/WEEKLY basis.

Check all items that are in good working condition, if in poor/unsafe working condition circle item and describe in comments. Any bicycle deemed unsafe for usage is to be tagged, taken out of service, and not used until repaired or replaced.

___ Frame	___ Front Brake Pads	___ Rear Brake Pads
___ Handlebar & Grips	___ Front Rim	___ Front Hub
___ Shift Cables	___ Front Tire	___ Front Spokes
___ Gear Shifters	___ Rear Rim	___ Rear Hub
___ Front Derailleur	___ Rear Tire	___ Rear Spokes
___ Rear Derailleur	___ Chain	___ Cranks
___ Brake Cables	___ Brake Levers	___ Pedals
___ Saddle/Seat	___ Kick Stand	___ Rack
___ Quick Releases	___ Bike Bag	___ Flash Light
___ Other (indicate below)		

**Air Pressure:** Front Tire: \_\_\_ (PSI) Rear Tire: \_\_\_ (PSI)

Comments:

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\_\_\_\_\_  
Officer Signature

\_\_\_\_\_  
Shift Supervisor

## 9D.2 BICYCLE TRAINING ACKNOWLEDGEMENT

I acknowledge that I have participated in the Paragon Bicycle Training Program and that I have read and understand the material (both in-class and actual bicycle training) covered in this training program.

### I understand...

1. Each security bicycle is company/client property and will not be ridden for personal use.
2. Use a bike rack or chain and lock to secure the bicycle when not in use.
3. Report any damage to a bicycle to a supervisor as soon as you observe it.
4. Security Officer should check each bicycle daily and make certain that each unit is clean and in good working condition. If something appears to be out of the ordinary, do not ride the bicycle, tag it as unsafe to ride, and contact your supervisor immediately.
5. There will be no horseplay, racing, speeding, or misuse of the bicycles at any time.
6. Travel slowly when you are around pedestrians.
7. Make eye contact with motorists and pedestrians.
8. Bicycle speed is 5 mph and under.
9. Never weave in and out of traffic or parked cars.
10. Obey all stop, yield, and other safety signs.
11. Ride single file and give the right-of-way to pedestrians.
12. Bicyclists should not carry passengers at any time.
13. Safety helmets and safety vests will be provided by Paragon and worn while riding at all times.
14. Do not park your bicycle in fire lanes, in front of building exits, or any sidewalk that provides pedestrian, wheelchair, or emergency exit.
15. All safety equipment will be provided by Paragon (i.e. helmets, pants, shorts, water bottles).
16. No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding a bicycle for Paragon

If I do not fully understand the contents of the material in this program, it is my responsibility to seek clarification from the Trainer and/or local District Director before I leave the class today.

Officer's Name: \_\_\_\_\_ Trainer's Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Signature: \_\_\_\_\_

Date: \_\_\_\_\_ Date: \_\_\_\_\_

## 9D.3 BICYCLE TRAINING RIDING TEST

Rider's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Test Patrol Bike #: \_\_\_\_\_

### PREPARATION FOR RIDING

- \_\_\_ Checked chain
- \_\_\_ Adjusted seat post
- \_\_\_ Checked all cables
- \_\_\_ Checked brakes
- \_\_\_ Checked gear shift/gear selection
- \_\_\_ Turns safely

### LANE CHANGE

- \_\_\_ Checks blind spot
- \_\_\_ Scans ahead
- \_\_\_ Uses signals
- \_\_\_ Switches lanes smoothly
- \_\_\_ Parks in right position

### OPEN ROAD DRIVING

- \_\_\_ Follows safely
- \_\_\_ Does not cross center line
- \_\_\_ Rides in right lane
- \_\_\_ Uses gears and brakes safely
- \_\_\_ Passes safely
- \_\_\_ Speed is safe
- \_\_\_ Scans ahead
- \_\_\_ Uses signals
- \_\_\_ Moves smoothly

### INTERSECTIONS

- \_\_\_ Checks all traffic
- \_\_\_ Stops when required
- \_\_\_ Speed is safe

### STEERING AND TURNS

- \_\_\_ Gives proper hand signals
- \_\_\_ Hands in stable position
- \_\_\_ Proper speed on turns
- \_\_\_ Turns from right lane
- \_\_\_ Turns into right lane

### DISMOUNT

- \_\_\_ Speed is safe
- \_\_\_ Rider maintains balance
- \_\_\_ Observes traffic
- \_\_\_ Uses proper signals to stop

### PATROL NAVIGATION

- \_\_\_ Patrol Speed
- \_\_\_ Patrol Awareness
- \_\_\_ Patrol parking and stopping

### ATTENTION

- \_\_\_ Attentive when riding
- \_\_\_ Notices signs and instructions
- \_\_\_ Doesn't take chances

\_\_\_ **COLUMN TOTAL** (23 max.)

\_\_\_ **COLUMN TOTAL** (15 max.)

**Test Score =** \_\_\_\_\_ (Total number of passed items divided by 38, Passing score = >80%)

\_\_\_\_\_  
Trainee's Signature

\_\_\_\_\_  
Trainer's Signature

# 9E T3 Motion ® Personal Mobility Vehicle (PMV)

## T3 Motion Personal Mobility Vehicle Overview

The following document is focused on creating formal written guidelines and instructions for the development and deployment of a T3 Motion ® Standup Personal Mobility Vehicle (T3 PMV) program which can be used and customized as required.

This document addresses topics common to developing and implementing a T3 PMV program and is to be modified to address additional situations or operations protocol specific to Paragon or the client, or to remove components not applicable to the operational environment.

## T3 Motion Personal Mobility Vehicle Program

### Introduction

The objective of this document is to provide guidance for participants in the operation and maintenance of a successful T3 PMV program.

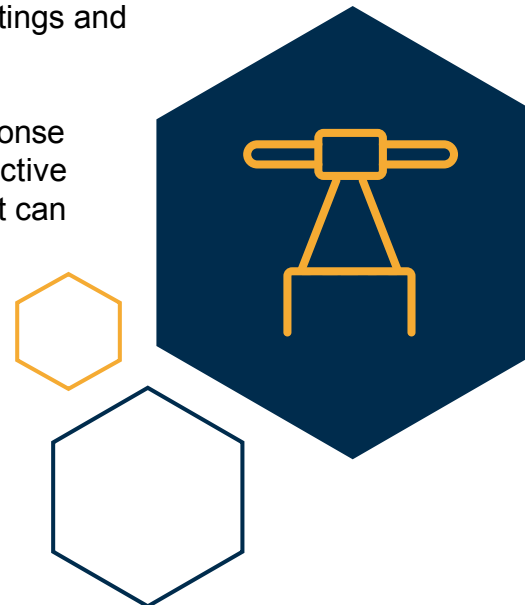
### Purpose

The T3 PMV is an alternative transportation device to satisfy a recognizable security patrol need at certain facilities. The T3 PMV is a battery operated, emission free mode of transportation that can help reduce overall vehicle investment costs over traditional fuel based vehicles. The T3 PMV equips security personnel with a quick response tool capable of carrying emergency supplies, providing personnel with a 9" height advantage as they ride, and providing superior visual coverage of areas. Riding a T3 PMV improves response time and covers a greater area more quickly than if traveling by foot. The T3 PMV has four user selectable speeds of 5 mph, 8 mph, 10 mph, and 12 mph, and is designed for both indoor and outdoor patrols and may be deployed for security patrols in shopping malls, airports, corporate and university campus settings and industrial buildings.

The use of a T3 PMV provides increased security visibility and rapid response times to requests for security services as T3 PMV's are extremely effective in reducing the time it takes security personnel to cover large areas as it can maneuver into and enter spaces other vehicles cannot due to its size and maneuverability. Improved statistics on service call response times facilitates an increase in community relations.

The T3 PMV provides personnel with the ability to carry moderately heavy equipment for their assignments.

Security T3 PMV riders will also be highly visible, representing a unique ability to reduce the opportunity for security incidents in and around the areas of their assigned active roving patrol routes.



## Structure and Staffing

### T3 PMV Coordinator

A staff member is to be selected to oversee the T3 PMV Program. This person would be considered the T3 PMV subject matter expert for the facility will be referred to as the T3 PMV Coordinator. The responsibilities of the T3 PMV Coordinator should include, but are not limited to:

- The selection of personnel who will participate in the T3 PMV program the training requirements for T3 PMV program participants
- Ensuring that only trained personnel operate department T3 PMV's
- Ensure personnel proficiency levels are maintained through continual re-certification and On-The-Job training
- The supervision of maintenance and repair of the T3 PMV's
- Assigning the T3 PMV's to personnel, selected posts and special events
- Maintaining the T3 PMV inventory
- Maintaining and updating the list of all T3 PMV and Info Key serial numbers
- Tracking system usage, maintenance and warranty issues
- Being the liaison between the department and the authorized T3 Account Manager

### T3 PMV Personnel

T3 PMV personnel are those employees who have volunteered for, or have been selected for use of the units by the T3 PMV Coordinator, and who have successfully met all of the criteria to safely operate a T3 PMV unit. The criteria to be used for the selection of T3 PMV personnel are as follows:

- T3 PMV personnel will ride in a variety of lighting, terrain, and weather conditions and must be willing to ride in these conditions.
- Personnel selected for the T3 PMV program should be in good physical condition, be able to stand for long periods of time, have good hand/eye coordination, good reaction time, and fall within the recommended weight limits for riders and cargo.
- The maximum payload of the T3 PMV (rider, installed options, and other auxiliary equipment) is not to exceed 450 lbs., exceeding the 450 lb. payload may decrease rider safety, reduce the performance and increase the risk of damage to the unit.
- If the T3 PMV Program Coordinator has any reservations about a person's physical condition or ability to safely operate a T3 PMV, that person will not be permitted to operate a T3 PMV unit until the issue is satisfactorily resolved with the T3 PMV Coordinator.

## Training and Requirements

### T3 PMV Training

T3 PMV training will be based on the type of unit purchased and to be or is being used at the specific facility where it will be driven, and also based on the specific unit options that are on the units that will be driven. The following training must be completed by all officers before being



permitted to drive a T3 PMV unit to promote a safe operational environment, avoid accidents, prevent injuries, and reduce liability:

- All T3 PMV program candidates must successfully pass all departmental T3 PMV Training Classes. Training is to include:
  - » Proper stance
  - » Location of ignition switch & speed setting switch
  - » How to read display panel
  - » Low and high speed cone weave
  - » Figure 8 turns
  - » Off-set 90 degree turns
  - » U-turns
  - » Obstacle course
  - » Curb transition
  - » Power module replacement & charge levels & charging hook-ups
  - » Controls - lights, sirens
  - » Stopping/braking & parking brake operation
  - » Required use of PPE
- For all T3 PMV training sessions, the T3 PMV should be set to slow mode until proficiency is achieved.
- Training specific to the facility and the rider's job responsibilities will be required and facilitated by the T3 PMV Coordinator, including low clearance locations and site specific hazards.
- Continuous On-the-Job training may be facilitated as needed by the T3 PMV Coordinator.

## **T3 PMV Equipment**

The T3 PMV is a battery powered Personal Transporter, and is classified as an Electric Personal Assistive Mobility Device (EPAMD). The standard T3 PMV comes equipped with 2 swap-able power modules, headlights, brake lights, tail lights, turn indicators, emergency lights, lockable storage compartment, removable soft storage pack, 1 portable charging unit with power cords and 2 spare power modules, 2 charging cords, and a full set of documentation which includes the T3 PMV Safety Video, and the T3 PMV Service & Repair Manual.

The T3 PMVs assigned at this location are to be identified with a unit ID number, and will be stored at designated locations with the facility when not in use.

The units identifying number will be used when assigning units and for maintenance recording purposes.

The T3 PMVs that are owned or leased by Paragon at a location are to be equipped with the following accessories which were approved at the time of installation:

- Pedestrian Beeper
- Designated Paragon Logo and SECURITY lettering
- Light package

- Warning backup Beeper
- Charging cables
- Lockable storage devices

If optional cargo containers were installed, only the following items may be stored in the containers e.g. Flashlight, Clipboard and items approved by the SE-3 PMV Coordinator. If the T3 PMV has auxiliary storage units, a spare battery charging cable should be carried with the unit.

Based on the accessories that are provided with the units, the following items apply:

- If equipped with a pedestrian beeper, the audible warning device will be utilized as needed in crowded settings to alert pedestrians of the rider's presence
- If equipped with a handlebar bag and hard case bags, they may be utilized as a storage area for departmental supplies including but not limited to emergency equipment, supplies, paperwork, or other items required by the officer during his/her shift
- If equipped with lockable hard cases, the cases are to be locked at all times whenever the T3 PMV is left unattended
- If provided with auxiliary lighting, lighting shall be used in low light settings for the safety of the rider and to increase the visibility of the rider

Only department-issued T3 PMV's will be utilized for department use. Under no circumstances will personnel be allowed to use personal or privately owned T3 PMV's for department duty, nor will department issued T3 PMV's be allowed for private usage by any personnel.

No accessories or signage may be affixed to the T3 PMV without the approval of the T3 PMV Coordinator. To identify the unit as a Security vehicle, company logos, unit numbers and signage will be affixed to each unit in a designated location as approved by the T3 PMV Coordinator. No other logos, stickers, or identifying labels are to be attached to company units.

## **T3 PMV Maintenance and Maintenance Reports**

Personnel shall inspect their assigned T3 PMV at the beginning and end of each shift. This inspection shall include, but is not limited to:

- Adequate battery life for the assigned shift
- Damage
- Cleanliness
- Mats are securely attached to the Power Base
- Tire wear and pressure
- Foreign objects on the tires
- Properly secured and functioning accessories
- A spare Info Key battery located under the console trim piece
- Spare batteries for any installed accessories

See the T3 Pre-operation Inspection Checklist in Section 9(e)(1) of the Safety Manual.

Personnel shall report any discrepancies to the T3 PMV Coordinator immediately. The T3 PMV Coordinator shall place out-of-service any T3 PMV that is damaged or functioning in an unsafe manner.

The T3 PMV Coordinator must define what communication methods can and cannot be used to notify the T3 PMV Coordinator of discrepancies.

The maintenance responsibilities of the T3 PMV Coordinator are as follows:

- Maintaining an inventory of tools and spare parts required to perform maintenance on the T3 PMV's
- Maintaining a log for each unit in inventory
- Training personnel to perform maintenance on the T3 PMV
- The boundaries of what repairs are and are not allowed by personnel

## **T3 PMV Damage Injury Reports**

### **Damage Reports:**

Operators involved in an incident that damages the T3 PMV or other property, or results in an injury, will submit an Accident Report to the T3 PMV Coordinator by the end of their shift. Recommendations of data to include in the report may consist of, but not be limited to:

- The operator at the time of the incident
- Time, date, and location of the accident
- The identifying number of the T3 PMV involved in the accident
- The actual damage incurred
- Environmental factors leading to the accident (outside, inside, surface type, wet or dry conditions)
- How the accident occurred

The accident, along with any damage to the unit will also be noted in the unit's maintenance log.

### **Internal Injury Reports:**

Officers are to report all injuries immediately using the Paragon Officer/Employee Incident/ Injury Report to the District Office.

## **Uniforms and Equipment**

T3 PMV operators are to wear the following:

- **Helmets are to be worn at all times while using the T3 PMV**
- Wear appropriate footwear that protects your feet and provides adequate support and comfort, sandals are not permitted
- Operators should avoid wearing any type of loose clothing, accessories, or equipment that could become entangled in the T3 PMV's Handlebar or Lean Steer Frame and cause a hazard while riding. Check with supervision regarding the uniform of the day that will be permitted depending on weather inclement conditions, e.g. heat, cold, rain, high winds, etc.

- If an operator must wear a lanyard to carry credentials or any other object, a safety lanyard should be used in place of a standard lanyard

## **Operations and Responsibilities**

### **T3 PMV Operation**

- T3 PMV's shall be operated under control at all times and shall never be ridden outside of the operator's capabilities, outside the safety parameters specified in the T3 PMV Reference Manuals, or on dangerous surfaces.
- Using the T3 PMV for any function except for its intended purpose is prohibited.
- T3 PMV's will be operated only by personnel who have successfully completed the T3 PMV Training Class and who are approved by the T3 PMV Coordinator.
- When operating a T3 PMV, the rider should always be aware of his/her surroundings (ground conditions, pedestrian traffic, etc.), and should only ride on approved routes.
- Although riding a T3 PMV is capable of being ridden up or down curbs, the driving of T3 PMVs up escalators or stairs is prohibited; riders should always ride around obstacles, not over them.
- Operators should always monitor the charge of the T3 PMV's power modules and should not allow the batteries to run to depletion.
- When the Info Key Controller on the power module indicates the T3 PMV batteries charge level is 25% or less, the operator should return to a charging station to recharge the unit's batteries.
- Operating a T3 PMV while under the influence of alcohol, illegal drugs, or any medication that causes drowsiness is strictly prohibited.
- Operating a T3 PMV while fatigued is prohibited and operators should take regularly scheduled breaks to ensure that they are rested and alert at all times.
- In the case the T3 PMV unit will be used during a specific law enforcement situations the Site procedures will be followed & officers are to follow the instructions given by the AHJ.
- Officers utilizing T3 PMV units will adhere to safe speeds based on where the units are being ridden and what situation and environments the units are being used in. If pedestrian or other obstacles are present, speeds are to be greatly reduced.
- Any officer observing the misuse of a T3 PMV by another operator shall report it to their supervisor immediately.

### **T3 PMV Operator Responsibilities**

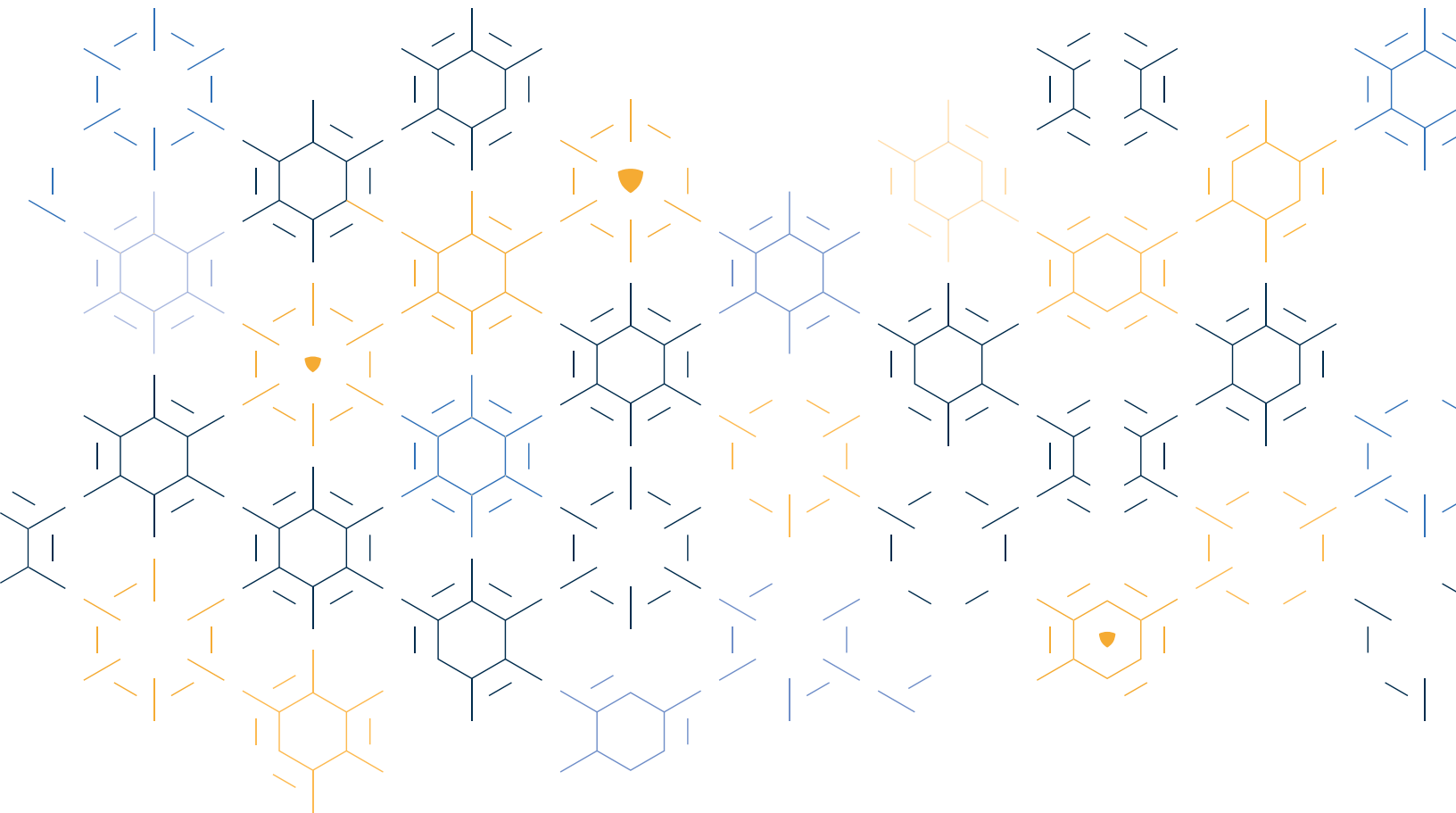
Each operator is responsible for inspecting the T3 PMV prior to its use and shall inspect their assigned T3 PMV at the beginning and end of each shift. The inspection is to include items previously mentioned in this document and shall be documented and turned in at the end of each shift.

- The use of communication and listening devices (cell phone, two-way radios, headphones, etc.) should not be used while operating the T3 PMV units. Officers are to stop before using these devices.
- Officers are to maintain two hands on control devices whenever driving the units. Clipboards or other devices are to be stored in storage compartment or soft pack until the unit is stopped,

device retrieved, used and returned to storage compartment before proceeding to next destination unless a device is provided for holding the device is attached to the unit.

- At NO time while operating a T3 PMV will the consumption of food and beverages be permitted.
- To prevent theft, the T3 PMV units are to be secured at all times even when leaving it momentarily (e.g. checking doors/areas on foot, lunch breaks, restroom breaks, etc.) The ignition key is to always be removed and secured by the Officer.
- When not in use (between shifts, overnight, etc.), the T3 PMV and the ignition key shall be returned to the designated storage area, and the keys and Info Key is to be secured and stored in the site designated location.
- In order to maintain optimum usage of the T3 PMV units during an entire time of usage, the battery is to be charged as follows (while on a lunch break, between shifts, overnight, etc.). In addition, the unit is to be secured, the power modules/battery units are to be exchanged, and charger cable hooked up to the battery unit needing recharging whenever the charge level reaches a charge level of 25% or lower.

Any questions regarding this policy shall be directed to the T3 PMV Coordinator.



## 9E.1 T3 MOTION PMV PRE-OPERATION INSPECTION CHECKLIST

Name: \_\_\_\_\_ Date: \_\_\_\_\_

T3 Motion Unit No.: \_\_\_\_\_

*Note: All items checked in Fix, N/A, or Damaged boxes are to be described in full detail in Officer Comment section below and on back of form.*

Check power module charge status	<input type="checkbox"/> OK	<input type="checkbox"/> Needs Chrg	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Ensure power modules fully inserted	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check lights & switches function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check hand & parking break function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check R L operation of handlebar	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check tire wear & pressure (20 psi)	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check tire damage, overall condition	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Chk control module display operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
All exterior accessories secured	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check twist throttle operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check siren operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check cleanliness & exterior damages	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check spare batteries for all access	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Spare info key battery in place	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Charger cable available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Helmets available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Reflective vests available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

Officer Comments: *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above.*

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## 9E.2 T3 MOTION PMV OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating T3 Motion Personal Mobility Vehicle (T3 PMV) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the T3 Motion Personal Mobility Vehicle (T3 PMV) Program and will adhere to all the requirements of this program. I acknowledge that I have received information and 3 hours of training on the T3 PMV unit. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between automobiles and T3 PMV's
- All T3 PMV controls and instrumentation and how they work
- Motor operations
- Steering, turning, and breaking
- Vehicle stability and all maneuverability functions
- Visibility, lights
- Operating limits including applicable functioning speeds (5 mph, 8 mph, 10 mph, & 12 mph), increased height of operator, and overhead restrictions
- Make eye contact with motorists and pedestrians; travel slowly when around pedestrians; and give the right-of-way to pedestrians.
- Recharging/replacing of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists
- Safety helmets & Hi-visibility vests will be provided by Paragon and worn while riding at all times.
- No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding a T3 PMV for Paragon
- There will be no horseplay, racing, speeding, or misuse of the T3 PMV at any time.
- Upon issue, will not allow anyone, including Paragon personnel, to use the T3 PMV during my shift, and will not use the T3 PMV for anything other than job related duties.
- That the key needs to be removed/secured and parking break set every time the unit is left.

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Instructor/Trainer Name \_\_\_\_\_ Date \_\_\_\_\_

cc: Personnel File



## 9E.3 T3 MOTION PMV RIDING TRAINING TEST

Rider's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Test Patrol T3 PMV #: \_\_\_\_\_

### PREPARATION FOR RIDING

- \_\_\_ Checked tire pressure & condition
- \_\_\_ Checked power modules charge
- \_\_\_ Checked power modules fully inserted
- \_\_\_ Checked lights, switches, display
- \_\_\_ Checked hand & parking brakes
- \_\_\_ Checked for unit damage & cleanliness
- \_\_\_ Checked PPE available
- \_\_\_ Checked twist throttle operation
- \_\_\_ Checked handlebar operation R & L

### STEERING, TURNS, AND STOPS

- \_\_\_ Performing low speed turns
- \_\_\_ Performing figure eights
- \_\_\_ Performing offset R & L hand 90 degree turns
- \_\_\_ Performing 0 degree U-turns
- \_\_\_ Performing obstacle & curb maneuvers
- \_\_\_ Performing low & hi-speed cone weaves
- \_\_\_ Proper speed on turns & leaning techniques
- \_\_\_ Performing sudden stops

### LANE/DIRECTION CHANGE

- \_\_\_ Check blind spots
- \_\_\_ Scans ahead
- \_\_\_ Uses signals
- \_\_\_ Changes direction smoothly

### INTERSECTIONS

- \_\_\_ Attentive when riding
- \_\_\_ Notices signs and instructions
- \_\_\_ Doesn't take chances
- \_\_\_ Always gets big picture/looks ahead
- \_\_\_ Aware of surroundings/hazards

\_\_\_ **COLUMN TOTAL** (26 max.)

### UNDERSTANDS UNIT FEATURES

- \_\_\_ Use of key switch
- \_\_\_ Use of headlight & tail light switch
- \_\_\_ Use of break levers
- \_\_\_ Use of parking break lever
- \_\_\_ Use of right handle bar twist throttle
- \_\_\_ Can describe power consumption meter
- \_\_\_ Power consumption when recharge needed
- \_\_\_ Use of emergency lights switch & usage
- \_\_\_ Can describe trip odometer

### PATROL NAVIGATION

- \_\_\_ Patrol speed
- \_\_\_ Patrol awareness
- \_\_\_ Patrol parking and stopping
- \_\_\_ Aware of low obstacles
- \_\_\_ Proper guarding of keys when not in use

### INTERSECTIONS

- \_\_\_ Checks all vehicle/pedestrian traffic
- \_\_\_ Stops when required
- \_\_\_ Speed is safe
- \_\_\_ Looks both ways before proceeding

### ATTENTION

- \_\_\_ Observes traffic
- \_\_\_ Uses proper signals to stop
- \_\_\_ Parks in right position
- \_\_\_ Sets parking break
- \_\_\_ Observes for underfoot debris before dismount

\_\_\_ **COLUMN TOTAL** (23 max.)

**Test Score =** \_\_\_\_\_ (Total number of passed items divided by 49, Passing score = >80%)

\_\_\_\_\_  
Trainee's Signature

\_\_\_\_\_  
Trainer's Signature

# 9F Trikke® Light Electric Vehicle (LEV)

## Trikke Light Electric Vehicle Overview

The following document is focused on creating formal written guidelines and instructions for the development and deployment of a Trikke LEV Program which can be used and customized as required.

This document addresses topics common to developing and implementing a Trikke LEV Program. This program can be modified to address additional situations or operation protocols specific to Paragon or the client; or to remove components not applicable to the operational environment.

## Trikke Light Electric Vehicle Program

### Introduction

The objective of this document is to provide guidance for participants in the operation and maintenance of a successful Trikke LEV Program.

### Purpose

The Trikke LEV is a personnel motion operated and/or alternative electronic transportation device used to satisfy a recognizable security patrol need at certain facilities or locations. The Trikke LEV is a stand-up carving, cambering (leaning) three wheeled personnel motion and/or battery operated unit, and emission free mode of transportation that can help reduce overall vehicle investments costs over traditional fuel based vehicles. The Trikke LEV equips security personnel with a compact, portable, light weight quick response unit which provides personnel with a 9-10" height advantage as they ride and conduct visual coverage of areas. Riding a Trikke LEV improves response time and covers a greater area more quickly than if traveling by foot.

The Trikke LEV has a hand throttle control and two maximum speed settings of 12 & 16 mph, or if so equipped, a 5 speed setting capability with a default speed setting of 9 -10 mph, and the unit can be scooted, rolled or propelled with body motion if the power supply is depleted. Maximum speed on a flat surface is predicated on the amount of carving activity performed by the rider. The 42-46 pound unit (35 lbs. with battery removed) based on accessories is collapsible; can be transported in the trunk of a vehicle; taken to different locations; is designed for both indoor and outdoor use; and may be deployed for security patrols in shopping malls, airports, corporate and university campus settings and industrial buildings.

The use of a Trikke LEV provides increased security visibility and rapid response times to requests for security services as they are extremely effective in reducing the time it takes security personnel to cover large areas as it can maneuver into and enter spaces other vehicles cannot due to its size and maneuverability. Improved statistics on service call response times facilitates an increase in community relations.

## Structure and Staffing

### Trikke Coordinator

A staff member is to be selected to oversee the Trikke LEV Program. This person would be considered the Trikke LEV subject matter expert for the facility and will be referred to as the Trikke Coordinator. The responsibilities of the Trikke Coordinator should include, but are not limited to:

- The selection of personnel who will participate in the Trikke LEV Program
- The training requirements for Trikke LEV Program participants
- Ensuring that only trained personnel operate department Trikke LEV's
- Ensure personnel proficiency levels are maintained through continual re-certification and On-The-Job training
- The supervision of maintenance and repair of the Trikke LEV's
- Assigning the Trikke LEV's to personnel, selected posts and special events
- Maintaining the Trikke LEV inventory
- Maintaining and updating the list of all Trikke LEV's
- Tracking system usage, maintenance and warranty issues
- Being the liaison between the department and the authorized Trikke LEV Account Manager

### Trikke LEV Personnel

Trikke LEV personnel are those employees who have volunteered for, or have been selected for use of the units by the Trikke Coordinator, and who have successfully met all of the criteria to safely operate a Trikke LEV unit. The criteria to be used for the selection of Trikke LEV personnel are as follows:

- Trikke LEV personnel will ride in a variety of lighting, terrain, and weather conditions and must be willing to ride in these conditions
- Personnel selected for the Trikke LEV Program must be in good physical condition, have good knee flexibility, be able to stand for long periods of time, have good hand/eye coordination, good reaction time, and fall within the recommended weight limits for riders and cargo
- The maximum payload of the Trikke LEV (rider, installed options, and other auxiliary equipment) is not to exceed 250 pounds. Exceeding the 250 lb. payload may decrease rider safety, reduce the performance, battery life, and increase the risk of damage to the unit
- If the Trikke Program Coordinator has any reservation/issue about a person's physical condition or ability to safely operate a Trikke LEV, that person will not be permitted to operate a unit until the issue is satisfactorily resolved

## Training and Requirements

### Trikke LEV Training

All Trikke LEV training is to be conducted by a Trikkle certified trainer, and will be based on the type of unit purchased and to be or is being used at the specific facility where it will be driven, and also based on the specific unit options that are on the units that will be driven. The following training

must be completed by all Officers before being permitted to drive a Trikke LEV unit to promote a safe operational environment, avoid accidents, prevent injuries, and reduce liability:

- All Trikke LEV Program candidates must successfully pass all departmental Trikke Training Classes. Training is to include:
  - » Required use of PPE
  - » How to fold and unfold the unit
  - » How to adjust the handlebar height
  - » Installation and removal of gear bag
  - » Features of the cambering mechanism
  - » How to mount/dismount the unit using the brakes, and proper stance while on unit
  - » Location of ignition switch & speed setting switch
  - » How to set speed setting switch
  - » Acceleration, stopping/braking & parking brake operation
  - » How to read display panel
  - » Low and high speed cone weave through 2 rows of cones
  - » Figure 8 turns
  - » Tight condition maneuvers, backing out – 160 degree turns
  - » U-turns
  - » Obstacle course
  - » Curb transition
  - » Hill climbing or riding down inclines/hills
  - » Battery replacement & charge levels & charging hook-ups
  - » Controls - lights, sirens
  - » Securing cable unwrapping, locking, and storage
- For all training sessions, the Trikke LEV should be set to the slowest mode until proficiency is achieved
- Training specific to the facility and the rider's job responsibilities will be required and facilitated by the Trikke Coordinator, including low clearance locations and site specific hazards
- Continuous On-the-Job training may be facilitated as needed by the Trikke Coordinator

## **Trikke LEV Equipment**

The Trikke LEV is a personnel motion operated and/or battery powered Personal Transporter, and is classified as an Electric Personal Assistive Mobility Device (EPAMD). The standard Trikke LEV comes equipped with rechargeable batteries, headlights, brake lights, tail lights, turn indicators, emergency lights, lockable storage compartment, removable soft storage pack, 1 portable charging unit with power cords and 2 spare power modules, 2 charging cords, and a full set of documentation which includes the Trikke LEV Safety Video, and the Trikke LEV Service & Repairs Manual.

The Trikke LEVs assigned at this location are to be identified with a unit ID number, and will be stored at designated locations within the facility when not in use.

The units identifying number will be used when assigning units and for maintenance recording purposes.

The Trikke LEVs that are owned or leased by Paragon at a location are equipped a Pedestrian Beeper, or a water bottle cage which were approved at the time of installation. As the unit is small only a limited amount of items that have been approved by the Trikke Coordinator are to be carried or stored on the unit.

Based on options provided, the following items apply:

- If equipped with a pedestrian beeper, the audible warning device will be utilized as needed in crowded settings to alert pedestrians of the rider's presence
- If equipped with a storage bag, they may be utilized as a storage area for departmental supplies including but not limited to emergency equipment, supplies, paperwork, or other items required by the Officer during his/her shift
- If provided with auxiliary lighting, lighting shall be used in low light settings for the safety of the rider and to increase the visibility of the rider
- If provided with a water bottle cage, make sure a new full disposable water bottle has been placed in the cage at the beginning of the shift

Only department-issued Trikke LEVs will be utilized for department use. Under no circumstances will personnel be allowed to use personal or privately owned units for department duty, or will department issued units be allowed for private usage by any personnel.

No accessories or signage may be affixed to the Trikke LEV without the approval of the Trikke Coordinator. To identify the unit as a Security vehicle company logos and a unit number is to be affixed to each unit in a designated location as approved by the Trikke Coordinator. No other logos, stickers, or identifying labels are to be attached to company units.

## **Trikke LEV Maintenance and Maintenance Reports**

Personnel shall inspect their assigned Trikke LEV at the beginning and end of each shift. This inspection shall include, but is not limited to:

- Damage
- Cleanliness
- All nuts and bolts are tight/secure on the front fork, handle bar, and entire unit
- Proper battery installation and adequate battery life for the assigned shift
- Proper speed settings
- That folding mechanism on legs are properly locked
- Foot Mats are securely attached to foot pads
- That brakes are working properly
- Tire wear and tire pressure
- Foreign objects on the tires
- Throttle, siren & light operation
- Spare batteries for any installed accessories
- Proper PPE availability (helmets & vests)

See the Trikke Pre-Operation Inspection Checklist in Section 9(f)(1) of the Safety Manual.

Personnel shall report any discrepancies to the Trikke Coordinator immediately. The Trikke Coordinator shall place out-of-service any Trikke LEV that is damaged or functioning in an unsafe manner.

The Trikke Coordinator must define what communications methods can and cannot be used when being notified of any noted discrepancies.

The maintenance responsibilities of the Trikke Coordinator are as follows:

- Maintaining an inventory of tools & spare parts required to perform maintenance on the Trikke LEVs
- Maintaining a log for each unit in inventory
- Training personnel to perform maintenance on the Trikke LEVs
- The boundaries of what repairs are and are not allowed by personnel

## **Trikke LEV Damage Injury Reports**

### **Damage Reports:**

Operators involved in an incident that damages the Trikke LEV or other property, or results in an injury, will submit an Accident Report to the Trikke Coordinator by the end of their shift. Recommendations of data to include in the report may consist of, but not be limited to:

- The operator at the time of the incident
- Time, date, and location of the accident
- The identifying number of the Trikke unit involved in the accident,
- The actual damage incurred
- Environmental factors leading to the accident (outside, inside, surface type, wet or dry conditions)
- How the accident occurred

The accident, along with any damage to the unit will also be noted in the unit's maintenance log. Damaged units are to be taken out of service, tagged, and not used until all repairs have been completed and recertified for operation.

### **Internal Injury Reports:**

Officers are to report all injuries immediately using the Paragon Officer/Employee Incident/ Injury Report to the District Office.

## **Uniforms and Equipment**

All Trikke operators are to wear the following:

- **Helmets & Hi-visibility Safety Vests are to be worn at all times while using the Trikke LEVs**
- Wear appropriate footwear that protects your feet and provides adequate support and comfort, sandals are not permitted

- Operators should avoid wearing any type of loose clothing, accessories, or equipment that could become entangled in the Trikke LEV's handlebar or the frame and cause a hazard while riding. Check with supervision regarding the uniform of the day that will be permitted depending on weather inclement conditions, e.g., heat, cold, rain, high winds, etc.
- If an operator must wear a lanyard to carry credentials or any other object, a safety lanyard should be used in place of a standard lanyard

## **Operations and Responsibilities**

### **Trikke LEV Operation**

- Trikke LEVs shall be operated under control at all times and shall never be ridden outside of the operator's capabilities, outside the safety parameters specified in the Reference Manuals, or on dangerous surfaces
- Using the Trikke LEVs for any function except for its intended purpose is prohibited
- Trikke LEVs will be operated only by personnel who have successfully completed the Trikke LEV Training Class and who are approved by the Trikke Coordinator
- When operating a Trikke LEV, the rider should always be aware of his/her surroundings (ground conditions, pedestrian traffic, etc.), and should only ride on approved routes
- Although riding a Trikke LEV is capable of being ridden up or down curbs and may be taken/ not ridden on escalators it is not recommended, the driving of Trikke LEVs up or down stairs is prohibited; riders should always ride around obstacles, not over them
- When the power module indicates the Trikke LEV batteries charge level is 25% or less, the operator should return to a charging station to recharge the unit's batteries, or if spare batteries are provided, to change out the batteries and place the discharged battery on the charger
- Operating a Trikke LEV while under the influence of alcohol, illegal drugs, or any medication that causes drowsiness is strictly prohibited
- Operating a Trikke LEV while fatigued is prohibited and operators should take regularly scheduled breaks to ensure that they are rested and alert at all times
- In the case the Trikke LEV unit will be used during a specific law enforcement situation the Site procedures will be followed & officers are to follow the instructions given by the AHJ.
- Officers utilizing Trikke LEV units will adhere to safe speeds based on where the units are being ridden and what situation and environments the units are being used in. If pedestrians, other obstacles, or wet conditions are present, speeds are to be greatly reduced.
- Any officer observing the misuse of a Trikke LEV by another operator shall report it to their supervisor immediately.
- Any Trikke LEV with noted unit safety condition concerns is to be immediately taken out of service, tagged, and not used until repairs have been completed.

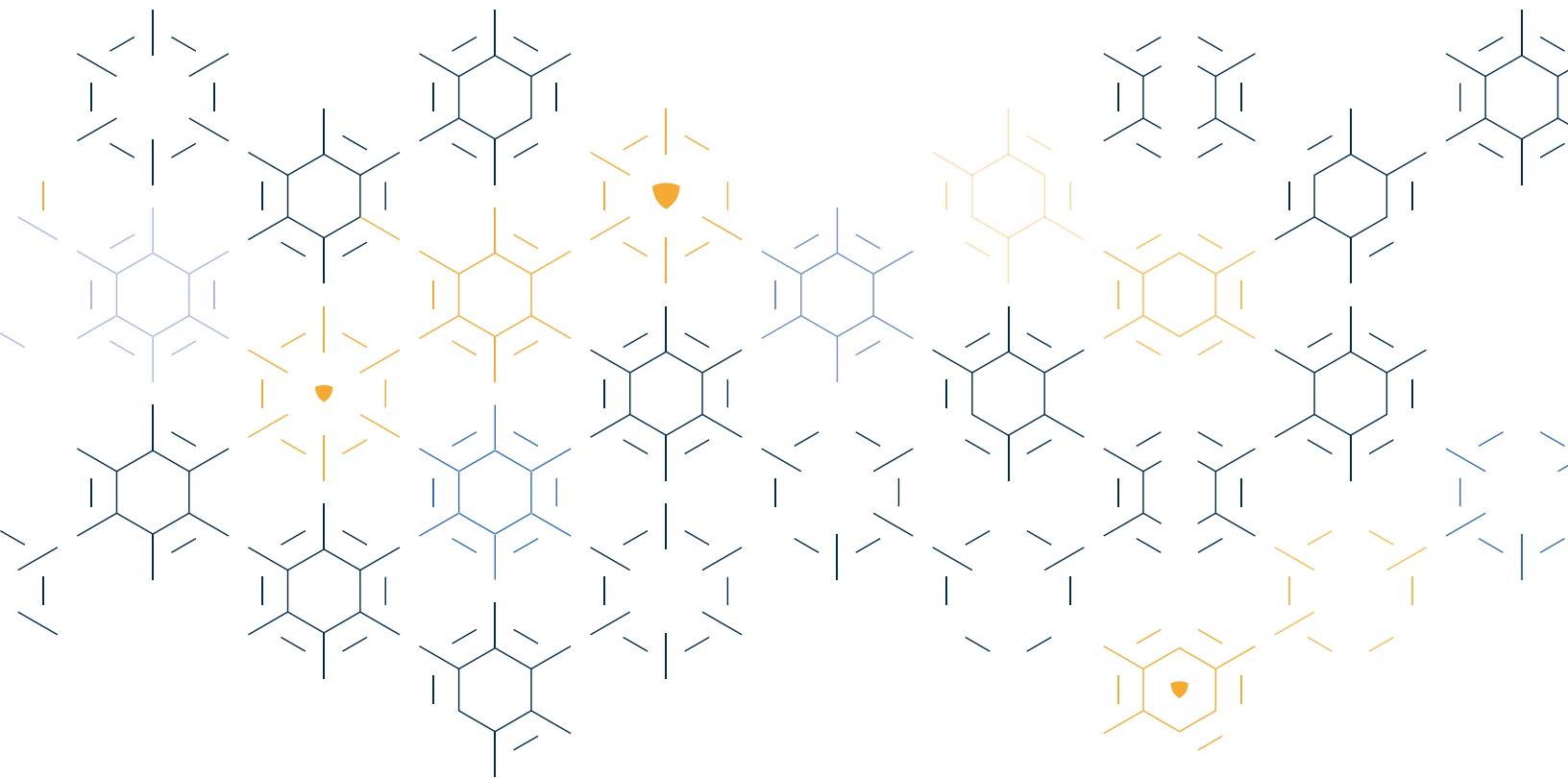
### **Trikke LEV Operator Responsibilities**

Each operator is responsible for inspecting the Trikke LEV prior to its use and shall inspect their assigned unit at the beginning and end of each shift. The inspection is to include items previously mentioned in this document and shall be documented and turned in at the end of each shift.



- The use of communication and listening devices (cell phone, two-way radios, headphones, etc.) should not be used while operating the Trikke LEV units. Officers are to stop before using these devices
- Officers are to maintain two hands on control devices whenever driving the units. Clipboards or other devices are to be stored in backpack until the unit is stopped, Officer dismounts the unit, engages the parking brake, device is retrieved, used and returned to storage pack before proceeding to next destination. If stopped and giving directions etc., one hand is to always stay in contact with the unit and engaging the brake
- At NO time while operating a Trikke LEV will the consumption of food and beverages be permitted
- To prevent theft, the Trikke LEV units are to be secured at all times even when leaving it momentarily (e.g., checking doors/areas on foot, lunch breaks, restroom breaks, etc.)
- When not in use (between shifts, overnight, etc.), the Trikke LEV shall be returned to the designated storage area, secured, and the key stored in a designated area.
- In order to maintain optimum usage of the Trikke LEV units during an entire time of usage, the battery is to be charged as follows (while on a lunch break, between shifts, overnight, etc.). In addition, the unit is to be secured, the power modules/battery units are to be exchanged, and charger cable hooked up to the battery unit needing recharging whenever the charge level reaches a charge level of 25% or lower.

Any questions regarding this policy shall be directed to the Trikke Coordinator.



## 9F.1 TRIKKE LEV PRE-OPERATION INSPECTION CHECKLIST

Name: \_\_\_\_\_ Date: \_\_\_\_\_

Trikke LEV Unit No.: \_\_\_\_\_

*Note: All items checked in Fix, N/A, or Damaged boxes are to be described in full detail in Officer Comment section below and on back of form.*

Check power module charge status	<input type="checkbox"/> OK	<input type="checkbox"/> Needs Chrg	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Ensure power modules fully inserted	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check lights & switches function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check hand & parking break function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check R & L operation of handlebar	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Tire Pres. (80 psi rear, 70-75 psi front)	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check tire damage, overall condition	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Chk control module display operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
All exterior accessories & gear secured	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check twist throttle operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check siren operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check cleanliness & exterior damages	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check batteries of all accessories	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Lock and lock cable available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Charger & charger cable available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Helmets available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Reflective vests available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

Officer Comments: *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above.*

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## 9F.2 TRIKKE LEV OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating Trikke Light Electric Vehicle (Trikke LEV) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the Trikke Light Electric Vehicle (Trikke LEV) Program and will adhere to all the requirements of this program. I acknowledge that I have received information and 3 hours of training on the Trikke LEV unit. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between automobiles and Trikke LEV's
- All Trikke LEV controls and instrumentation and how they work
- Motor operations
- Steering, turning, maneuvering, and breaking
- Vehicle stability and all maneuverability functions
- Visibility, lights, sirens
- Operating limits including applicable functioning speeds, increased height of operator, and overhead restrictions
- Make eye contact with motorists and pedestrians; travel slowly when around pedestrians; give the right-of-way to pedestrians; and follow all same laws "rules of the road" as a bicycle
- Recharging/replacing of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists
- Safety helmets & Hi-visibility vests will be provided by Paragon and worn while riding at all times
- No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding a Trikke LEV for Paragon
- There will be no horseplay, racing, speeding, or misuse of the Trikke LEV at any time
- Upon issue, will not allow anyone, including Paragon personnel, to use the Trikke LEV during my shift, and will not use the Trikke LEV for anything other than job related duties
- That the key needs to be removed/secured and parking break set every time the unit is left and the unit secured by cable/lock or locking device

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Instructor/Trainer Name \_\_\_\_\_ Date \_\_\_\_\_

cc: Personnel File

## 9F.3 TRIKKE LEV RIDING TRAINING TEST

Rider's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Test Patrol Trikke LEV #: \_\_\_\_\_

### PREPARATION FOR RIDING

- \_\_\_ Checked front & rear tire pressure & condition
- \_\_\_ Checked battery charge
- \_\_\_ Checked battery fully inserted
- \_\_\_ Checked lights, switches, display
- \_\_\_ Checked hand & parking brakes
- \_\_\_ Checked for unit damage & cleanliness
- \_\_\_ Checked PPE available
- \_\_\_ Checked twist throttle operation
- \_\_\_ Checked handlebar operation R & L
- \_\_\_ Checked accessory inventory

### STEERING, TURNS, AND STOPS

- \_\_\_ Performing low speed turns
- \_\_\_ Performing figure eights
- \_\_\_ Performing tight condition 160 degree turns
- \_\_\_ Performing 0 degree U-turns
- \_\_\_ Performing obstacle & curb maneuvers
- \_\_\_ Performing low & hi-speed cone weaves
- \_\_\_ Proper speed on turns & leaning techniques
- \_\_\_ Performing sudden stops
- \_\_\_ Up-hill & down-hill maneuvers

### LANE/DIRECTION CHANGE

- \_\_\_ Checks blind spot
- \_\_\_ Scans ahead
- \_\_\_ Uses signals
- \_\_\_ Changes direction smoothly

### ATTENTION

- \_\_\_ Attentive when riding
- \_\_\_ Notices signs and instructions
- \_\_\_ Doesn't take chances
- \_\_\_ Always gets big picture/looks ahead
- \_\_\_ Aware of surroundings/hazards

\_\_\_ **COLUMN TOTAL** (28 max.)

### UNDERSTANDS UNIT FEATURES

- \_\_\_ Use of key switch
- \_\_\_ Use of headlight & tail light switch
- \_\_\_ Use of break levers R & L
- \_\_\_ Use of parking break levers
- \_\_\_ Use of handle bar twist throttle
- \_\_\_ Can describe power consumption meter
- \_\_\_ Power consumption when recharge needed
- \_\_\_ Use of emergency lights switch & usage
- \_\_\_ Can describe trip odometer
- \_\_\_ Proper folding & unfolding of Trikke

### PATROL NAVIGATION

- \_\_\_ Patrol Speed
- \_\_\_ Patrol Awareness
- \_\_\_ Patrol parking and stopping
- \_\_\_ Aware of low obstacles
- \_\_\_ Proper guarding of keys when not in use
- \_\_\_ Securing of Trikke unit before leaving it
- \_\_\_ Awareness of wet surface conditions
- \_\_\_ Proper breaking techniques
- \_\_\_ Proper mounting & dismounting techniques

### INTERSECTIONS

- \_\_\_ Checks all vehicle/pedestrian traffic
- \_\_\_ Stops when required
- \_\_\_ Speed is safe
- \_\_\_ Looks both ways before proceeding

### DISMOUNT

- \_\_\_ Observes traffic
- \_\_\_ Uses proper signals to stop
- \_\_\_ Parks in right position
- \_\_\_ Sets parking break
- \_\_\_ Observes for underfoot debris before dismount

\_\_\_ **COLUMN TOTAL** (28 max.)

**Test Score =** \_\_\_\_\_ (Total number of passed items divided by 56, Passing score = >80%)

\_\_\_\_\_  
Trainee's Signature

\_\_\_\_\_  
Trainer's Signature

# 9G Segway SE-3 Patroller® Personal Mobility Vehicle (PMV)

## Segway SE-3 Patroller Personal Mobility Vehicle Overview

The following document is focused on creating formal written guidelines and instructions for the development and deployment of a Segway SE-3 Patroller® Standup Personal Mobility Vehicle (SE-3 PMV) program which can be used and customized as required.

This document addresses topics common to developing and implementing a SE-3 PMV program and is to be modified to address additional situations or operations protocol specific to Paragon or the client, or to remove components not applicable to the operational environment.

## SE-3 Patroller® Personal Mobility Vehicle Program Introduction

The objective of this document is to provide to provide guidance for participants in the operation and maintenance of a successful SE-3 PMV program.

### Purpose

The SE-3 PMV is an alternative transportation device to satisfy a recognizable security patrol need at certain facilities. The SE-3 PMV is powered by a Lithium Ion 1kWh battery which provides an emission free mode of transportation that can help reduce overall vehicle investments costs over traditional fuel based vehicles. The SE-3 PMV equips security personnel with a quick response tool capable of carrying emergency supplies. This standup vehicle provides personnel with a 9 3/4" height advantage as they ride, and the increased height provides superior visual coverage of areas. Riding a SE-3 PMV improves response time and covers a greater area more quickly than if traveling by foot. The SE-3 PMV has a normal maximum speed of 15 mph, but different maximum speeds may be programmed into the unit by Segway dealers or distributors. And the unit is designed for both indoor and outdoor patrols and may be deployed for security patrols in shopping malls, airports, corporate and university campus settings and industrial buildings.

The use of a SE-3 PMV provides increased security visibility and rapid response times to requests for security services as SE-3 PMV's are extremely effective in reducing the time it takes security personnel to cover large areas. With its 42" turning radius it can maneuver into and enter spaces other vehicles cannot due to its size and maneuverability. Improved statistics on service call response times facilitates an increase in community relations.

The SE-3 PMV provides personnel with the ability to carry moderately heavy equipment for their assignments.

Security SE-3 PMV riders will also be highly visible, representing a unique ability to reduce the opportunity for security incidents in and around the areas of their assigned active roving patrol routes.

## Structure and Staffing

### SE-3 PMV Coordinator

A staff member is to be selected to oversee the SE-3 PMV Program. This person would be considered the SE-3 PMV subject matter expert for the facility will be referred to as the SE-3 PMV Coordinator. The responsibilities of the SE-3 PMV Coordinator should include, but are not limited to:

- The selection of personnel who will participate in the SE-3 PMV program
- The training requirements for SE-3 PMV program participants
- Ensuring that only trained personnel operate department SE-3 PMV's
- Ensure personnel proficiency levels are maintained through continual re-certification and On-The-Job training
- The supervision of maintenance and repair of the SE-3 PMV's
- Assigning the SE-3 PMV's to personnel, selected posts and special events
- Maintaining the SE-3 PMV inventory
- Maintaining and update the list of all SE-3 PMV and Key serial numbers
- Tracking system usage, maintenance and warranty issues
- Being the liaison between the department and the authorized SE-3 Account Manager

### SE-3 PMV Personnel

SE-3 PMV personnel are those employees who have volunteered for, or have been selected for use of the units by the SE-3 PMV Coordinator, and who have successfully met all of the criteria to safely operate a SE-3 PMV unit. The criteria to be used for the selection of SE-3 PMV personnel are as follows:

- SE-3 PMV personnel will ride in a variety of lighting, terrain, and weather conditions and must be willing to ride in these conditions.
- Personnel selected for the SE-3 PMV program should be in good physical condition, be able to stand for long periods of time, have good hand/eye coordination, good reaction time, and fall within the recommended weight limits for riders and cargo.
- The maximum payload of the SE-3 PMV (rider, installed options, auxiliary equipment and all cargo) is not to exceed 350 lbs., exceeding the 350 lb. payload may decrease rider safety, reduce the performance and increase the risk of damage to the unit. The unit has 3 storage compartments, one capable of carrying 10 lbs. of cargo and two capable of carrying 5 lbs. of cargo. The SE-3 PMV also has a minimum rider weight restriction of 100 lbs. to be able to activate the rider detection system.
- If the SE-3 PMV Program Coordinator has any reservations about a person's physical condition or ability to safely operate a SE-3 PMV, that person will not be permitted to operate a SE-3 PMV unit until the issue is satisfactorily resolved with the SE-3 PMV Coordinator.

# Training and Requirements

## SE-3 PMV Training

SE-3 PMV training will be based on the type of unit purchased and to be or is being used at the specific facility where it will be driven, and also based on the specific unit options that are on the units that will be driven. The following training must be completed by all officers before being permitted to drive a SE-3 PMV unit to promote a safe operational environment, avoid accidents, prevent injuries, and reduce liability:

- All SE-3 PMV program candidates must successfully pass all departmental SE-3 PMV Training Classes. Training is to include:
  - » Proper stance
  - » Location of ignition switch
  - » How to read display panel
  - » Rider Controls - key, throttle, turn indicators, forward & reverse switch, lights, hazard indicators, horn/sirens, front & rear brakes, parking brake, drive/standby switch
  - » Stopping/braking & parking brake operation
  - » Low and high speed cone weave
  - » Figure 8 turns
  - » Off-set 90 degree turns
  - » U-turns
  - » Obstacle course, including slopes/ramps and rough/unpaved surfaces
  - » Power module replacement & charge levels & charging hook-ups
  - » Required use of PPE – helmets, high visibility vests, slip resistant soled footwear
- For all SE-3 PMV training sessions, the SE-3 PMV should be driven at slow speeds until proficiency is achieved.
- Training specific to the facility and the rider's job responsibilities will be required and facilitated by the SE-3 PMV Coordinator, including low clearance locations and site specific hazards.
- Continuous On-the-Job training may be facilitated as needed by the SE-3 PMV Coordinator.

## SE-3 PMV Equipment

The SE-3 PMV is a battery powered Personal Transporter, and is classified as an Electric Personal Assistive Mobility Device (EPAMD). The standard SE-3 PMV comes equipped with 2 swap-able Lithium Ionpower modules, headlights, brake lights, tail lights, turn indicators, emergency lights, lockable storage compartments, 1 portable charging unit with power cords and 2 spare power modules, 2 charging cords, and a full set of documentation which includes the SE-3 PMV Safety Video, and the SE-3 PMV Service & Repairs Manual.

The SE-3 PMVs assigned at a location are to be identified with a unit ID number, and will be stored at designated locations within the facility when not in use.

The units identifying number will be used when assigning units and for maintenance recording purposes.



The SE-3 PMVs at this location that are owned or leased by Paragon at a location are to be equipped with the following accessories which were approved at time of installation:

- Pedestrian Beeper
- Designated Paragon Logo and SECURITY lettering
- Light package
- Warning backup Beeper
- Charging cables
- Lockable storage devices

The 3 provided/installed cargo containers have weight restrictions of 5-10 lbs. and the following items may be stored in the containers e.g. Flashlight, Clipboard and items approved by the SE-3 PMV Coordinator. The SE-3 PMV battery charging cable should be carried with the unit.

Depending on the accessories that are provided with the units, the following items:

- If equipped with a pedestrian beeper, the audible warning device will be utilized as needed in crowded settings to alert pedestrians of the rider's presence
- If equipped with a hard case storage enclosures, they may be utilized as a storage area for departmental supplies including but not limited to emergency equipment, supplies, paperwork, flashlight, or other items required by the officer during his/her shift
- If equipped with lockable hard cases, the cases are to be locked at all times whenever the SE-3 PMV is left unattended
- If provided with auxiliary lighting, lighting shall be used in low light settings for the safety of the rider and to increase the visibility of the rider

Only department-issued SE-3 PMV's will be utilized for department use. Under no circumstances will personnel be allowed to use personal or privately owned SE-3 PMV's for neither department duty, nor will department issued SE-3 PMV's be allowed for private usage by any personnel.

No accessories or signage may be affixed to the SE-3 PMV without the approval of the SE-3 PMV Coordinator. To identify the unit as a Security vehicle, company logos, unit numbers and signage will be affixed to each unit in a designated location as approved by the SE-3 PMV Coordinator. No other logos, stickers, or identifying labels are to be attached to company units.

### SE-3 PMV Maintenance and Maintenance Reports

Personnel shall inspect their assigned SE-3 PMV at the beginning and end of each shift. This inspection shall include, but is not limited to:

- Adequate battery life for the assigned shift
- Functioning of all lighting, warning devices, brakes, and steering column
- Damage
- Cleanliness
- Mats are securely attached to the Power Base
- Tire wear and pressure

- Foreign objects on the tires
- Properly secured and functioning accessories
- A spare Key located/hidden under the console trim piece (optional)
- Spare batteries for any installed accessories

See the SE-3 Pre-operation Inspection Checklist in Section 9(g)(1) of the Safety Manual.

Personnel shall report any discrepancies to the SE-3 PMV Coordinator immediately. The SE-3 PMV Coordinator shall place out-of-service any SE-3 PMV that is damaged or functioning in an unsafe manner.

The SE-3 PMV Coordinator must define what communications methods can and cannot be used to notify the SE-3 PMV Coordinator of discrepancies.

The maintenance responsibilities of the SE-3 PMV Coordinator are as follows:

- Maintaining an inventory of tools and spare parts required to perform maintenance on the SE-3 PMV's
- Maintaining a log for each unit in inventory
- Training personnel to perform maintenance on the SE-3 PMV
- The boundaries of what repairs are and are not allowed by personnel

## **SE-3 PMV Damage Injury Reports**

### **Damage Reports:**

Operators involved in an incident that damages the SE-3 PMV or other property, or results in an injury, will submit an Accident Report to the SE-3 PMV Coordinator by the end of their shift. Recommendations of data to include in the report may consist of, but not be limited to:

- The operator at the time of the incident
- Time, date, and location of the accident
- The identifying number of the SE-3 PMV involved in the accident,
- The actual damage incurred
- Environmental factors leading to the accident (outside, inside, surface type, wet or dry conditions)
- How the accident occurred

The accident, along with any damage to the unit will also be noted in the unit's maintenance log.

### **Internal Injury Reports:**

Officers are to report all injuries immediately using the Paragon Officer/Employee Incident/ Injury Report to the District Office.

## Uniforms and Equipment

SE-3 PMV operators are to wear the following whenever using the SE-3 PMV:

- **Helmets are required to be worn at all times while using the Segway**
- High visibility vests are to be worn while driving the vehicle
- Wear appropriate slip-resistant footwear that protects your feet and provides adequate support and comfort. Sandals are not permitted.
- Operators should avoid wearing any type of loose clothing, accessories, or equipment that could become entangled in the SE-3 PMV's Handlebar or Lean Steer Frame and cause a hazard while riding. Check with supervision regarding the uniform of the day that will be permitted depending on weather inclement conditions e.g. heat, cold, rain, high winds etc.
- If an operator must wear a lanyard to carry credentials or any other object, a safety lanyard should be used in place of a standard lanyard.

## Operations and Responsibilities

### SE-3 PMV Operation

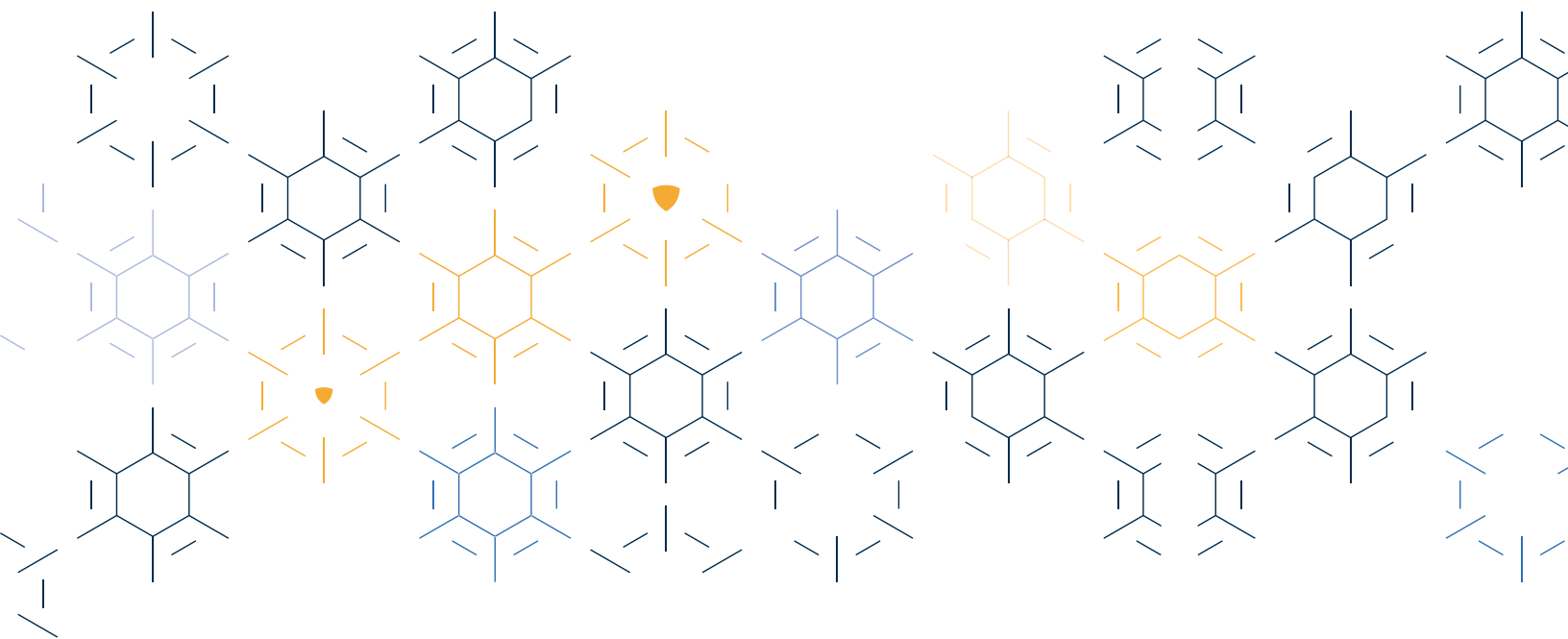
- SE-3 PMV's shall be operated under control at all times and shall never be ridden outside of the operator's capabilities, outside the safety parameters specified in the SE-3 PMV Reference Manuals, or on dangerous surfaces.
- Using the SE-3 PMV for any function except for its intended purpose is prohibited.
- SE-3 PMV's will be operated only by personnel who have successfully completed the SE-3 PMV Training Class and who are approved by the SE-3 PMV Coordinator.
- When operating a SE-3 PMV, the rider should always be aware of his/her surroundings (ground conditions, pedestrian traffic, etc.), and should only ride on approved routes. Never operate the SE-3PMV over curbing or on stairways or escalators.
- Operators should always monitor the charge of the SE-3 PMV's power modules and should not allow the batteries to run to depletion.
- When the Info Key Controller on the power module indicates the T3 PMV batteries charge level is 25% or less, the operator should return to a charging station to recharge the unit's batteries.
- Operating a SE-3 PMV while under the influence of alcohol, illegal drugs, or any medication that causes drowsiness is strictly prohibited.
- Operating a SE-3 PMV while fatigued is prohibited and operators should take regularly scheduled breaks to ensure that they are rested and alert at all times.
- In the case the SE-3 PMV unit will be used during a specific law enforcement situations the Site procedures will be followed & officers are to follow the instructions given by the AHJ.
- Officers utilizing SE-3 PMV units will adhere to safe speeds based on where the units are being ridden and what situation and environments the unit is being used in. If pedestrian or other obstacles are present, speeds are to be greatly reduced.
- Any officer observing the misuse of a SE-3 PMV by another operator shall report it to their supervisor immediately

## SE-3 PMV Operator Responsibilities

Each operator is responsible for inspecting the SE-3 PMV prior to its use and shall inspect their assigned SE-3 PMV at the beginning and end of each shift. The inspection is to include items previously mentioned in this document and shall be documented and turned in at the end of each shift.

- The use of communications and listening devices (cell phone, two-way radios, headphones, etc.) should not be used while operating the SE-3 PMV units. Officers are to stop before using these devices.
- Officers are to maintain two hands on control devices whenever driving the units. Clipboards or other devices are to be stored in storage compartment until the unit is stopped, device retrieved, used and returned to storage compartments before proceeding to next destination unless a device is provided for holding the device is attached to the unit.
- At NO time while operating a SE-3 PMV will the consumption of food and beverages be permitted
- To prevent theft, the SE-3 PMV units are to be secured at all times even when leaving it momentarily (e.g. checking doors/areas on foot, lunch breaks, restroom breaks, etc.) The ignition key is to always be removed and secured by the officer.
- When not in use (between shifts, overnight, etc.), the SE-3 PMV and the Ignition Key shall be returned to the designated storage area, and the keys and Info Key is to be secured and stored in the site designated location.
- In order to maintain optimum usage of the SE-3 PT units during an entire time of usage, the battery is to be charged as follows (while on a lunch break, between shifts, overnight, etc.). In addition, the unit is to be secured the power modules/battery units are to be exchanged and charger cable hooked up to the battery unit needing recharging whenever the charge level reaches a charge level of 25% or lower. The battery module units must be fully charged for at least 12 hours once a month, or once every 12 hours of operation, whichever comes first.

Any questions regarding this policy shall be directed to the SE-3 PMV Coordinator.



## 9G.1 SEGWAY SE-3 PATROLLER PMV PRE-OPERATION INSPECTION CHECKLIST

Officer Name: \_\_\_\_\_ Date: \_\_\_\_\_

SE-3 Patroller Unit No.: \_\_\_\_\_

*Note: All items checked in the Fix , N/A or Damaged boxes are to be described in full detail in the Officer Comment section below and on the back of the form.*

Check power module charge status	<input type="checkbox"/> OK	<input type="checkbox"/> Needs Chrg	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Ensure power modules/battery fully inserted	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check lights & switches function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check front, rear & parking brake function	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check free R & L operation of handlebar	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check tire pressure (22 psi Front, 20 psi Rear)	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check for tire wear/damage, overall condition	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check control console display operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check that all accessories properly secured	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check throttle operating properly	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check siren/horn is working properly	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check back-up notification working properly	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check unit for cleanliness	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check for exterior damages	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check for spare battery access	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check charger cable is available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check spare key is available under console	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check helmets are available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check high visibility vests are available	<input type="checkbox"/> YES	<input type="checkbox"/> NO	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

Officer Comments: *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above.*

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## 9G.2 SEGWAY SE-3 PATROLLER PMV OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating Segway SE-3 Patroller Personal Mobility Vehicle (SE-3 PMV) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the Segway SE-3 Patroller Personal Mobility Vehicle (SE-3 PMV) Program and will adhere to all the requirements of this program. I acknowledge that I have received information and 3 hours of training on the SE-3 PMV unit. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between SE-3 PMV and automobiles
- All SE-3 PMV controls and instrumentation and how they work
- Motor operations
- Steering, turning, and breaking
- Vehicle stability and all maneuverability functions
- Visibility, lights, flashers, horns, sirens, back up notification
- Operating limits including applicable functioning speeds (Maximum 15 mph), increased height of operator, and overhead restrictions, ground clearance
- Make eye contact with motorists and pedestrians; travel slowly when around pedestrians; and give the right-of-way to pedestrians.
- Recharging/replacing of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists
- Safety helmets & Hi-visibility vests will be provided by Paragon and worn while riding at all times.
- No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding a SE-3 PMV for Paragon
- There will be no horseplay, racing, speeding, or misuse of the SE-3 PMV at any time.
- Upon issue, will not allow anyone, including Paragon personnel, to use the SE-3 PMV during my shift, and will not use the SE-3 PMV for anything other than job related duties.
- That the key needs to be removed/secured and parking break set every time the unit is left.

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Instructor/Trainer Name \_\_\_\_\_ Date \_\_\_\_\_

cc: Personnel File

# 9G.3 SEGWAY SE-3 PATROLLER PMV RIDING TRAINING TEST

Rider's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Test SE-3 Patroller PMV #: \_\_\_\_\_

## PREPARATION FOR RIDING

- ☐ Checked tire pressure front/rear & condition
- ☐ Checked power modules/battery charge
- ☐ Checked power modules fully inserted
- ☐ Checked lights, switches, display, horn/siren
- ☐ Checked hand & parking brakes
- ☐ Checked for unit damage & cleanliness
- ☐ Checked PPE available
- ☐ Checked twist throttle operation
- ☐ Checked handlebar operation R & L
- ☐ Checked backup notification working

## STEERING, TURNS, AND STOPS

- ☐ Performing low speed turns
- ☐ Performing figure eights
- ☐ Performing offset R & L hand 90 degree turns
- ☐ Performing 0 degree U-turns
- ☐ Performing obstacle & incline maneuvers
- ☐ Performing low & hi-speed cone weaves
- ☐ Proper speed on turns & leaning techniques
- ☐ Performing sudden stops

## LANE/DIRECTION CHANGE

- ☐ Checks blind spot
- ☐ Scans ahead
- ☐ Uses signals
- ☐ Changes direction smoothly

## ATTENTION

- ☐ Attentive when riding
- ☐ Notices signs and instructions
- ☐ Doesn't take chances
- ☐ Always gets big picture/looks ahead
- ☐ Aware of surroundings/hazards

\_\_\_ **COLUMN TOTAL** (27 max.)

## UNDERSTANDS UNIT FEATURES

- ☐ Use of key switch
- ☐ Use of headlight & tail light switch
- ☐ Use of break levers
- ☐ Use of parking break switch/lever
- ☐ Use of right handle bar twist throttle
- ☐ Can describe power consumption meter
- ☐ Power consumption when recharge needed
- ☐ Use of emergency lights switch & usage
- ☐ Can describe trip odometer

## PATROL NAVIGATION

- ☐ Patrol Speed
- ☐ Patrol Awareness
- ☐ Patrol parking and stopping
- ☐ Aware of low obstacles
- ☐ Proper guarding of keys when not in use

## INTERSECTIONS

- ☐ Checks all vehicle/pedestrian traffic
- ☐ Stops when required
- ☐ Speed is safe
- ☐ Looks both ways before proceeding

## DISMOUNT

- ☐ Observes traffic
- ☐ Uses proper signals to stop
- ☐ Parks in right position
- ☐ Sets parking break, uses blocks if on incline
- ☐ Observes for underfoot debris before dismount

\_\_\_ **COLUMN TOTAL** (23 max.)

**Test Score =** \_\_\_\_\_ (Total number of passed items divided by 50, Passing score = >80%)

\_\_\_\_\_  
Trainee's Signature

\_\_\_\_\_  
Trainer's Signature



## 9H All-Terrain Vehicles and Utility Task Vehicles

### All-Terrain and Utility Task Vehicle Personal Transporter Overview

The following document is focused on creating formal written guidelines and instructions for the development and deployment of an All-Terrain Vehicle (ATV) and Utility Task Vehicle (UTV) program which can be used and customized as required.

This document addresses topics common to developing and implementing an All-Terrain Vehicle and Utility Task Vehicle program and is to be modified to address additional situations or operations protocol specific to Paragon or the client, or to remove components not applicable to the operational environment.

### ATV and UTV Personal Transporter Program

#### Introduction

The objective of this document is to provide guidance for participants in the operation and maintenance of a successful an All-Terrain Vehicle and Utility Task Vehicle program.

#### Differences between an ATV and UTV

The things that are in common are that they are designed to be ridden in the out-of-doors and off-road, and they have four wheels. But they differ in the following ways:

- ATVs are smaller than a UTV and are meant for a single rider, while the UTV, sometimes called Side-by-Sides or Off Road Vehicles, can hold 2-4 passengers
- ATVs are gasoline powered engines only, while UTV can be either gasoline or electric with a gasoline back-up capability
- ATVs are ridden while straddling the motor either while standing or sitting, while the UTV are equipped with seats or benches
- ATVs have handle bars, while UTVs have steering wheels like a car or truck
- ATVs are smaller more nibble units and handle well in tighter spaces, while UTV are longer and wider with a limited turning radius
- The ATV accelerator is on the handle bars while the UTV is a gas pedal on the floor
- ATV breaking is done by grips on the handle bars, while UTV breaking is done by pedals on the floor
- ATVs have limited storage and hauling capabilities, while UTVs usually are equipped with large storage areas, some even have dump truck type abilities and are designed for carrying equipment and heavy loads
- ATVs do not have capabilities for Roll Cages or Seat Belts, while UTVs can be equipped with both, can be enclosed, and may also have windshields.
- One other difference is that UTVs are easier to be made street legal.

## Purpose

The ATV or UTV is an alternative transportation device to satisfy a recognizable security patrol need at certain facilities or for certain environments. The ATVs or UTVs are a mode of transportation that can help reduce overall vehicle investment costs. These vehicles equip security personnel with a quick response tool capable of carrying emergency supplies and providing superior visual coverage of areas. Riding an ATV or UTV improves response time and covers a greater area more quickly than if traveling by foot. These units are designed for outdoor patrols over areas that conventional cars and trucks may not be able to go due to terrain, lack of roads, damaged roads, and inclement weather conditions. They may be deployed for security patrols of the perimeters of malls, airports, corporate and university campus settings, large industrial complexes, and large open areas.

The use of an ATV or UTV provides increased security visibility and rapid response times to requests for security services as ATVs or UTVs are extremely effective in reducing the time it takes security personnel to cover large areas even over rough terrain without roads. Improved statistics on service call response times facilitates an increase in community relations.

The ATV or UTV provides personnel with the ability to carry moderately heavy equipment for their assignments.

Security ATV or UTV riders will also be highly visible, representing a unique ability to reduce the opportunity for security incidents in and around the areas of their assigned active roving patrol routes.

## Structure and Staffing

### ATV or UTV Coordinator

A staff member is to be selected to oversee the ATV or UTV Program. This person would be considered the ATV or UTV subject matter expert for the facility and will be referred to as the ATV or UTV Coordinator. The responsibilities of the ATV or UTV Coordinator should include, but are not limited to:

- The selection of personnel who will participate in the ATV or UTV program
- The training requirements for ATV or UTV program participants
- Ensuring that only trained personnel operate department ATV or UTV
- Ensure personnel proficiency levels are maintained through continual re-certification and On-the-Job training
- The supervision of maintenance and repair of the ATV or UTV
- Assigning the ATV or UTV to personnel, selected posts and special events
- Maintaining the ATV or UTV inventory
- Maintaining and updating the list of all ATV or UTV and serial numbers
- Tracking system usage, maintenance and warranty issues
- Being the liaison between the department and the authorized ATV or UTV account manager

## ATV or UTV Personnel

ATV or UTV Personnel are those employees who have volunteered for, or have been selected for use of the ATV or UTV by the ATV or UTV Coordinator, and who have successfully met all of the criteria to safely operate an ATV or UTV unit. The criteria to be used for the selection of ATV or UTV personnel are as follows:

- ATV or UTV Personnel will ride in a variety of lighting, terrain, and weather conditions and must be willing to ride in these conditions
- Personnel selected for an ATV program should be in good physical condition, be able to stand and/or ride for long periods of time over uneven or rough terrain, have good hand/eye coordination, be able to step over the motor/gas tank of an ATV, good reaction time, and fall within the recommended weight limits for riders and cargo
- If the ATV or UTV Program Coordinator has any reservations about a person's physical condition or ability to safely operate an ATV or UTV that person will not be permitted to operate an ATV or UTV unit until the issue is satisfactorily resolved with the Coordinator.

## Training and Requirements

### ATV or UTV Training

ATV or UTV training will be based on the type of unit purchased and to be or is being used at the specific facility where it will be driven. Training to include review of the unit operator's manual and is also to be based on the specific unit options that are on the units that will be driven. The following training must be completed by all officers before being permitted to drive an ATV or UTV unit to promote a safe operational environment, avoid accidents, prevent injuries, and reduce liability:

- All ATV or UTV program candidates must successfully pass all departmental ATV or UTV Training Classes
- Training specific to the facility, terrain to be ridden on, and the rider's job responsibilities will be required and facilitated by the ATV or UTV Coordinator
- Continuous On-the-Job training may be facilitated as needed by the ATV or UTV Coordinator

### ATV or UTV Equipment

The ATVs or UTVs that are assigned to a location are to be identified with a unit number, and will be stored at designated locations within the facility when not in use.

The unit's identifying number will be used when assigning units and for maintenance recording purposes.

The ATV or UTV that are owned or leased by Paragon at this location are to be equipped with the following accessories which were approved at the time of installation:

- All UTVs are to be equipped with seat belts for all passengers.
- All UTVs are to be equipped with roll cages
- Pedestrian Beeper
- All ATVs and UTVs are to have back-up beepers

- If being driven on public streets - license plate holder, lighting, turn signals, brake lighting, horn and any other items as required to be deemed street legal by the local authority having jurisdiction
- If ordered with storage devices, the devices are to be lockable

Depending on the accessories that are provided with a unit, the following items apply:

- If equipped with a pedestrian beeper, the audible warning device will be utilized as needed in crowded settings to alert pedestrians of the rider's presence
- If equipped with storage devices, they may be utilized for departmental supplies including but not limited to emergency equipment, supplies, paperwork, or other items required by the Officer during his/her shift
- If equipped with storage devices they are to be locked at all times whenever the ATV or UTV is left unattended
- If provided with auxiliary lighting, lighting shall be used in low light settings for the safety of the rider and to increase the visibility of the rider

Only department-issued ATVs or UTVs will be utilized for site use. Under no circumstances will personnel be allowed to use personal or privately owned ATVs or UTVs for department duty, nor will department issued ATVs or UTVs be allowed for private usage by any personnel.

No accessories or signage may be affixed to the ATV or UTV without the approval of the ATV or UTV Coordinator. To identify the unit as a Security vehicle, company logos and signage will be affixed to each unit in a designated location as approved by the ATV or UTV Coordinator. No other logos, stickers, or identifying labels are to be attached to company units.

## **ATV or UTV Maintenance and Maintenance Reports**

Personnel shall inspect their assigned ATV or UTV at the beginning and end of each shift. This inspection shall include, but is not limited to:

- Damage
- Cleanliness of overall unit
- Tire wear and pressure
- Foreign objects in/on the tires
- Properly secured and functioning accessories
- Shocks in good working order
- Cleaned windshield if so equipped
- All lighting working properly including brakes, headlight, tail lights etc.
- Throttle working properly
- Brakes working properly
- Steering working properly
- Back-up alarm working properly
- Gas tank topped off

See the ATV or UTV Pre-operation Inspection Checklist in Section 9(h)(1) of the Safety Manual.

Personnel shall report any discrepancies to the ATV or UTV Coordinator immediately. The ATV or UTV Coordinator shall place out-of-service any ATV or UTV that is damaged or functioning in an unsafe manner.

ATV or UTV Coordinator must define what communications methods can and cannot be used to notify the Coordinator of discrepancies.

The maintenance responsibilities of the ATV or UTV Coordinator are as follows:

- Maintaining an inventory of tools and spare parts required to perform maintenance on the ATVs or UTVs
- Maintaining a log for each unit in inventory
- Training personnel to perform maintenance on the ATV or UTV
- The boundaries of what repairs are and are not allowed by personnel

## ATV or UTV Damage Injury Reports

### Damage Reports:

Operators involved in an incident that damages the ATV or UTV or other property, or results in an injury, will submit an Accident Report to the ATV or UTV Coordinator by the end of their shift. Recommendations of data to include in the report may consist of, but not be limited to:

- The operator at the time of the incident
- Time, date, and location of the accident
- The identifying number of the ATV or UTV involved in the accident
- Speed unit was being operated at
- Surface conditions at time of incident
- The actual damage incurred
- Environmental factors leading to the accident (outside, inside, surface type, wet or dry conditions)
- How the accident occurred

The accident, along with any damage to the unit will also be noted in the unit's maintenance log.

### Internal Injury Reports:

Officers are to report all injuries immediately using the Paragon Officer/ Employee Incident/ Injury Report to the District Office.



## Uniforms and Equipment

ATV or UTV operators are to wear the following:

- **Helmets are required to be worn by the driver and all passengers at all times while using an ATV or UTV.**
- All ATV or UTV drivers and passengers will be supplied with either adjustable or appropriate various sized helmets. Enough helmets of all sizes are to be available to all UTV passengers.
- All helmets are to be inspected & disinfected daily prior to & after every use, replaced if damaged, or replaced every five years.
- If helmets are used by different persons, to ensure the health & safety of the wearer, head protection in the form a single use head skull cap/shell cap/head sock to minimize potential head lice infection if the helmet were to be contaminated.
- ATV or UTV drivers are to a high-visibility safety vest while driving the vehicle.
- If seat belts are provided on a UTV, they shall be worn by the driver and all passengers at all times while the unit is moving.
- ATV drivers are to be equipped with goggles or a face shield to prevent items from entering the eyes. UTV drivers are to be equipped with goggles or a face shield if there is no windshield on the UTV.
- Wear appropriate footwear that protects your feet and provides adequate support and comfort. Sandals are not permitted.
- ATV or UTV operators are to wear gloves if ATV handlebars do not have hand protection guards or if the UTV does not have a windshield.
- Operators should avoid wearing any type of loose clothing, accessories, or equipment that could become entangled in the ATV Handlebar and cause a hazard while riding. Check with supervision regarding the uniform of the day that will be permitted depending on weather inclement conditions e.g. heat, cold, rain, high winds etc.
- If an operator must wear a lanyard to carry credentials or any other object, a safety lanyard should be used in place of a standard lanyard.
- Operations and Responsibilities

## ATV or UTV Operation

- ATVs or UTVs shall be operated under control at all times and shall never be ridden outside of the operator's capabilities, outside the safety parameters specified by The ATV or UTV Coordinator, or on dangerous surfaces.
- Using the ATV or UTV for any function except for its intended purpose is prohibited
- ATVs or UTVs will be operated only by personnel who have successfully completed the ATV or UTV Training Class and who are approved by the ATV or UTV Coordinator.
- When operating an ATV or UTV, the rider should always be aware of his/her surroundings (ground conditions, pedestrian traffic, etc.), and should only ride on approved routes.
- Riding an ATV or UTV up or down curbs or stairs is prohibited; riders should always ride around obstacles, not over them.

- Operating an ATV or UTV while under the influence of alcohol, illegal drugs, or any medication that causes drowsiness is strictly prohibited.
- Operating an ATV or UTV while fatigued is prohibited and operators should take regularly scheduled breaks to ensure that they are rested and alert at all times.
- In the case the ATV or UTV unit will be used during a specific law enforcement situation the site procedures will be followed & officers are to follow the instructions given by the AHJ.
- Officers utilizing ATV or UTV units will adhere to safe speeds based on where the units are being ridden and what situation and environments the unit is being used in. If pedestrian or other obstacles are present, speeds are to be greatly reduced. If driving on roadways operators are to observe all posted speed limits and traffic signals/signs. (Note: As ATV and UTVs are not normally provided with speed governors, drivers are to maintain safe operations of the units at all times, especially when endeavoring in off-road maneuvers. If operators are observed driving at high rates of speed or recklessly disciplinary action up to and including dismissal may be taken.)
- Any Officer observing the misuse of a ATV or UTV by another operator shall report it to their supervisor immediately.

## **ATV or UTV Operator Responsibilities**

Each operator is responsible for inspecting the ATV or UTV prior to its use and shall inspect their assigned ATV or UTV at the beginning and end of each shift. The inspection is to include items previously mentioned in this document and shall be documented and turned in at the end of each shift.

- The use of communications and listening devices (cell phone, two-way radios, headphones, etc.) should not be used while operating the ATV or UTV units. Officers are to stop before using these devices.
- Officers are to maintain two hands on control devices whenever driving the units, Clipboards or other devices are to be stored in storage compartments until the unit is stopped, device retrieved, used and returned to storage compartment before proceeding to next destination unless a device is provided for holding the device is attached to the unit.
- At NO time while operating an ATV or UTV will the consumption of food and beverages be permitted.
- To prevent theft, the ATV or UTV units are to be secured at all times when leaving it momentarily (e.g. checking doors/areas on foot, lunch breaks, restroom breaks, etc.).
- When not in use (between shifts, overnight, etc.), the ATV or UTV shall be returned to the designated storage area and keys are to be secured and stored in the site designated location.
- In order to maintain optimum usage of the ATV or UTV units during an entire time of usage, the units are to be refueled or if a gasoline/electric unit the batteries are to be recharged as follows (while on a lunch break, between shifts, overnight, etc.).

All ATV or UTV drivers are to sign the acknowledgement form indicating they have received appropriate training on how to safely operate the ATV or UTV unit they are going to be driving and they understand the operation parameters and that the safety devices will be worn at all times of operation, see Section 9(h)2.

Any questions regarding this policy shall be directed to the ATV or UTV Coordinator.



## 9H.1 ATV UTV PRE-OPERATION OR DAMAGE INSPECTION CHECKLIST

ATV/UTV No.: \_\_\_\_\_

*Note: All items checked in Fix, N/A, or Damaged boxes are to be described in full detail in Officer Comment section below. Items marked with \* are UTV items.*

Walk around unit look for loose/broken items, & for any oil or coolant leaks, or any damage	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check brake fluid levels	<input type="checkbox"/> OK	<input type="checkbox"/> LOW	<input type="checkbox"/> N/A	<input type="checkbox"/> FILL
Check Engine Oil levels	<input type="checkbox"/> OK	<input type="checkbox"/> LOW	<input type="checkbox"/> N/A	<input type="checkbox"/> FILL
Check fuel levels	<input type="checkbox"/> OK	<input type="checkbox"/> LOW	<input type="checkbox"/> N/A	<input type="checkbox"/> FILL
Check coolant levels	<input type="checkbox"/> OK	<input type="checkbox"/> LOW	<input type="checkbox"/> N/A	<input type="checkbox"/> FILL
Check battery charge level	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> RECHARGE
Check Headlights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Emergency Lights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tail Lights	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Turn Signals	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tire Wear & Pressure	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Tires for cuts, cracks, or imbedded items	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Wheel Lugs are Tight	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check License Plate & ORV Stickers in place	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Horn, Backup & Pedestrian alarm working	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Hand Throttle/Foot Throttle Pedal oprtn.	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Hand Brake Lever/Foot Brake Pedal oprtn.	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Parking Brake operation	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check steering is full range & not binding	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check shifting mechanism is working	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Suspension level & firm, shocks not leaking	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Exterior Clean, free of mud & debris	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check UTV Interior, clean, seats in good shape	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Windshield, clean & no cracks*	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Wipers working*	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Seat Belts*	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Check Rear View & Side Mirrors*	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Helmets available, good condition, proper sizes	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED
Reflective Vests available	<input type="checkbox"/> OK	<input type="checkbox"/> FIX	<input type="checkbox"/> N/A	<input type="checkbox"/> DAMAGED

**Officer Comments:** *List additional noted malfunctions or any noted damages, and explain any items checked in the "Fix" or "N/A" boxes above. (Use back if more space is needed)*

## 9H.2 ATV UTV OPERATOR'S AGREEMENT

### PARAGON

To be completed by the employee prior to operating All-Terrain Vehicle (ATV) or Utility Task Vehicle (UTV) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

Name of Driver: \_\_\_\_\_

Driver's License Number: \_\_\_\_\_

Date of Training: \_\_\_\_\_

I, \_\_\_\_\_, have read and understand the All-Terrain Vehicle (ATV) and Utility Task Vehicle (UTV) Program and will adhere to all the requirements of this program. I acknowledge that I have received information and \_\_\_\_ hours of training on the ATV or UTV unit. The following items have been reviewed with me and I have had the opportunity to ask questions regarding the program and training with my supervisor.

- Knowledge of all operating instructions
- Difference between automobiles and ATVs or UTVs
- All ATV or UTV controls and instrumentation and how they work
- Motor operations
- Steering, turning, and breaking
- Vehicle stability and all maneuverability functions
- Visibility, lights
- Operating limits including applicable functioning speeds, increased height of operator, and overhead restrictions
- Make eye contact with motorists and pedestrians; travel slowly when around pedestrians; and give the right-of-way to pedestrians.
- Refueling of vehicle and recharging of batteries
- Emergency operations
- Accidents/Damage to Vehicle
- Pre-Operation Checklists
- Safety helmets, hi-visibility vests, and other safety equipment will be provided by Paragon and worn while riding at all times.
- No cell phones, PDA devices, or other electronic and/or handheld devices are to be used while operating and riding an ATV or UTV for Paragon
- There will be no horseplay, racing, speeding, or misuse of the ATV or UTV at any time.
- Upon issue, will not allow anyone, including Paragon personnel, to use the ATV or UTV during my shift, and will not use the ATV or UTV for anything other than job related duties.
- That the key needs to be removed/secured and parking break set every time the unit is left.

Employee Signature \_\_\_\_\_ Date \_\_\_\_\_

Instructor/Trainer Name \_\_\_\_\_ Date \_\_\_\_\_

cc: Personnel File

## 9H.3 ATV UTV TRAINING RIDING TEST

Rider's Name: \_\_\_\_\_ Date: \_\_\_\_\_

Trainer's Name: \_\_\_\_\_ ATV or UTV No.: \_\_\_\_\_

### PREPARATION FOR RIDING

- ☐ Checked for damage, leaks
- ☐ Checked unit was clean
- ☐ Checked fluid levels of brakes, engine oil, coolant
- ☐ Checked fuel level
- ☐ Checked all lights working, not burned out
- ☐ Checked brake lights & turnsignals working
- ☐ Check back-up alarm working
- ☐ Checked tire pressure on all 4 tires
- ☐ Checked wheel lugs tight
- ☐ Checked tires for wear, cuts, cracks, imbedded item
- ☐ Checked brakes working properly
- ☐ Checked parking brake working
- ☐ Checked steering free, full range & unbinding R & L
- ☐ Checked throttle working properly
- ☐ Checked shifting mechanism working properly
- ☐ Checked horn working
- ☐ Checked suspension, level, firm, shocks not leaking
- ☐ Checked windshield clean, not cracked, wipers working
- ☐ Checked helmet clean, not broken, adjusted & worn
- ☐ Checked Safety Vest available and worn
- ☐ Checked seat belts if available good condition & worn
- ☐ Checked other safety gear available & worn
- ☐ Checked license plate & ORV strickers in place

### PATROL NAVIGATION

- ☐ Patrol speed
- ☐ Patrol awareness
- ☐ Patrol stopping & parking
- ☐ Awareness of low hanging obstacle
- ☐ Proper guarding of keys when not riding

### ATTENTION

- ☐ Attentive while driving, aware of surroundings & hazards
- ☐ Notices signs and instructions
- ☐ Doesn't take chances
- ☐ Drives cautiously as conditions & terrain change
- ☐ Always gets big picture, looks ahead, behind, to side
- ☐ Uses mirrors
- ☐ Looking for pedestrians or animals in path of travel

\_\_\_\_\_ **COLUMN TOTAL** (35 max.)

**TEST SCORE =** \_\_\_\_\_ (Total number of passed items divided by 69, Passing score = >80%)

### UNDERSTANDS UNIT FEATURES

- ☐ Ignition Key location
- ☐ How to turn on lights
- ☐ How to operate clutch
- ☐ How to shift properly
- ☐ How to brake properly, front & rear
- ☐ How to set parking brake
- ☐ How to operate throttle, accelerating, decelerating
- ☐ How to set emergency flashers

### STEERING, TURNS, AND STOPS

- ☐ Performing straight line driving
- ☐ Performing turns & leaning techniques
- ☐ Performing turns while on a flat surface
- ☐ Performing turns while on an incline
- ☐ Performing sharp turns
- ☐ Performing cone weaves
- ☐ Performing riding over & around obstacles
- ☐ Performing swerving around obstacles
- ☐ Performing figure eights
- ☐ Performing low, med & hi speed braking to a stop
- ☐ Performing braking on an incline
- ☐ Performing riding up, down & across hill maneuver
- ☐ Performing U-Turns

### LANE/DIRECTION CHANGE

- ☐ Checks mirrors and/or blind spot
- ☐ Scans ahead
- ☐ Uses signals or hand signals
- ☐ Changes direction smoothly

### INTERSECTIONS

- ☐ Checks for all vehicle/pedestrian traffic
- ☐ Comes to complete stop when required
- ☐ Looks both ways before proceeding thru intersection
- ☐ Yields to traffic

### DISMOUNT

- ☐ Uses proper signals to stop
- ☐ Parks in correct position
- ☐ Observes traffic before leaving vehicle
- ☐ Sets parking brakes, uses blocks if on incline
- ☐ Looks for underfoot debris or hazard before dismounting

\_\_\_\_\_ **COLUMN TOTAL** (34max.)

\_\_\_\_\_  
Trainee's Signature

\_\_\_\_\_  
Trainer's Signature



## SECTION 10

# Accident Reporting and Investigation

# Accident Reporting and Investigation

## Introduction

Paragon regards accident notification, reporting and investigation as essential to the effectiveness of the Company Safety Program. All accident notifications must be prompt and accidents will be reported and investigated in accordance with these established procedures. The reporting of an accident should be regarded as an opportunity to discover what went wrong and why; and further, after investigation, it is the chance to correct and strengthen the Safety Management Program.

Caution needs to be used when approaching the scene of an accident or illness, it is important to protect whoever is inspecting the site. Approach the scene with care. Such dangers as lack of oxygen in confined spaces, fire, electrical, chemical, traffic and water hazards may exist. A patient may have an infectious disease such as hepatitis or AIDS. If there is a personal injury and it is felt that it would be unsafe to safely begin caring for the patient(s), emergency medical care should be contacted and describe the situation so they can dispatch the appropriate resources.

The information contained in this section of the Safety Manual represents a summary of the Accident Reporting and Investigation Procedures, additional instructions can be found in the company's Risk Management Guide under the Workers' Compensation Section.

## Responsibilities

### Employee

Employees are required to notify their Manager whenever an industrial accident, incident or illness occurs, and cooperate fully in the investigation process. Near miss and minor accidents without injury should also be reported to Management.

### District and Human Resources Manager

- Conduct and/or coordinate the notification and reporting process
- Summon necessary assistance and notify required company personnel
- Notify the Corporate Office when the accident requires hospitalization, amputation, fatality, loss of an eye, or results in serious loss

*Note: OSHA is to be notified of any employee being admitted into a hospital as a result of an injury or illness that occurred during working hours. The District Office is to follow the "Notification of Employee Injury or Fatality Procedure" located on the Risk Management section of the Paragon Portal.*

- Conduct timely investigation procedures to determine cause, obtain information, secure the scene and evidence, and prevent recurrence
- Notify the appropriate personnel and agencies such as OSHA, insurance representatives, and appropriate family members if an accident results in employee hospitalization (for more than observation), amputation or fatality, and/or if substantial injury occurs to a customer or serious property damage occurs

- Ensure proper record keeping of the OSHA 300 Form and Form 301, if a recordable injury or illness occurs. The 300 forms are available in the OSHA/MSHA section of the Risk Management portion of the Paragon Portal

## Accident Investigations

Investigating accidents is the responsibility of all levels of management, but the field supervisor's position has certain advantages:

- Field supervisors have daily contact with employees, know them best, know the operations and safety hazards
- They have personal interest in preventing injury to other employees
- They can communicate more effectively with the employees
- Most importantly they can take immediate action to prevent an accident from recurring

Obviously, major property damage, injury to a third party, or an incapacitating injury to an employee will seldom go unreported. However, many times minor injury or minor property damage that seem to be unimportant accidents do not get reported. Thinking that it is too minor to report it to supervision (e.g. a little cut to the finger or a slight slip on the floor) is where failure in reporting occurs. There is no such thing as an unimportant accident. Investigation results may be classified as minor, serious, or major, but this in no way means the accident in itself is unimportant. An infection requiring amputation may have started with a small scratch; slight loss of balance on Monday on an oil spot may result in a broken hip on Tuesday. The unreported accident cannot be investigated, nor its cause corrected.

Train new employees and retrain old employees to report all accidents, no matter how small, as well as "near miss" accidents.

Take action on reported incidents and accidents immediately.

The supervisor should discuss the accident with the employee and any witnesses, and gather pertinent information about the accident; not to place blame but to determine what happened. After the accident occurs, the primary concern is for the employee's welfare and for hazard correction.

The time for investigation is immediately, not the next shift or next day. Facts are clearer, more details are remembered and the site conditions are nearest those at the time of the accident.

Basic facts needed:

- Time
- Place
- What the employee was doing when the accident occurred
- How the employee thinks the accident happened

Put the employee at ease. The best way to approach the employee is with the purpose of prevention. Use the following in an effort to profit the most from the interview:

- Make the employee feel that the investigation is a joint effort
- Whenever possible, conduct the interview where the accident occurred

- Try to keep the interview as private as possible to put the employee at ease and avoid the influence of others
- When the employee speaks, don't interrupt to clarify, interpret or evaluate. If the person conducting the investigation does not understand something, wait until employee finishes speaking and ask for clarification
- Above all, as an investigator don't judge or draw conclusions. This is a fact finding mission
- Ask questions, and limit the questions to the facts, particularly early in the interview. Ask open questions that can't be answered "yes" or "no". Ask questions to find out "why" and "what" but not by asking "why"
- Repeat the employee's story as it was understood. This will assure correct understanding by allowing employees to be sure it was understood correctly; it also gives the employee the chance to hear what he/she said
- Close the interview on a positive note
- Ask for suggestions for prevention. This will reaffirm the purpose of the interview
- Use similar techniques for witnesses

Complete the written report as soon as possible to make sure the material is fresh.

The Supervisor's Accident Investigation form should be completed by the field supervisor or manager, and provides a key document in a review of losses by the safety committee. This report should be completed no later than five (5) days after the first notification of the incident.





## SECTION 11

# Emergency Egress Plan/Emergency Action Plan

# Emergency Egress Plan/Emergency Action Plan

## Introduction

OSHA'S Emergency Means of Egress Plan which includes 29CFR1910.36 and 29CFR1910.37, and OSHA's Emergency Action Plan (EAP) standard, 29CFR1910.38, often times are thought of to be the same standard. The Emergency Egress Plans are required for every workplace and requires employers to provide all the things needed to allow building occupants a safe means of egress/evacuation from the building whenever there is an emergency e.g. a fire. Emergency Action Plans, however, are required to be in place for facilities when an OSHA regulation specifically indicates one needs to be implemented. This document will indicate the differences between the two plans.

## Emergency Egress Plan Requirements

The key regulatory requirements for an **Egress Plan** are:

- There is to be more than one exit from a story with at least two exits remote from each other to prevent blockage of both by any one fire or other emergency condition
- Exit doors are to be side-hinged swinging type in the exit travel
- Exit routes must be free and unobstructed of explosive or highly flammable furnishings, other decorations, materials, or equipment at any time, either temporarily or permanently.
- Exit routes must be arranged so employees will not have to travel toward a high hazard area unless shielded by suitable partitions and barriers
- Exit routes must be adequately lighted so that an employee with normal vision can see along exit routes
- Exit access is to be suitably illuminated by a reliable safety lighting source of at least 0.5 – 1.0 foot-candles of energy on the surface of the egress route at all times
- Note: Life safety lighting includes legally mandated emergency egress and exit lighting and is required whenever a building is occupied. OSHA considers a building to be occupied if only one person is working in the building e.g. a security officer.
- Exits doors must be clearly visible, free of decorations that obstruct visibility of the exit route door and be marked with a sign reading "EXIT"
- Exits are to be marked clearly and access to exits shall be marked by visible signs when the exit signs are not clearly visible with arrows indicating the direction to the exit. These may be in the form of building diagrams may be posted throughout the facility that indicate where person is standing and having the egress path indicated from that point to the closest exit
- Any doorway or passage that does not lead to an exit that could be mistaken for an exit must be marked "Not an Exit"
- Each exit sign must be marked "EXIT" in distinct colored legible letters >6" high by ¾" thick and be illuminated by a reliable light source or by self-luminous or electroluminescent signs
- Operable alarms systems must have a distinctive signal to warn employees of fire or other emergencies

An example of a site Emergency Egress Plan is available in Section 11(a) of the Safety Manual.

# Emergency Action Plan Requirements

An Emergency Action Plan (EAP) technically applies only to those employers and facilities who are required to have a written EAP whenever an OSHA standard specifically requires one.

The standards that specifically require an EAP are as follows:

- 1910.119(n), Process Safety Management of Highly Hazardous Chemicals
- 1910.120(l), (p)(8), and (q)(1) Hazardous Waste Operations and Emergency Response (HAZWOPER)
- 1910.157(a)-(b), Portable Fire Suppression Equipment
- 1910.160(c), Fixed Extinguishing Systems, general
- 1910.164(e)(3), Fire Detection Systems
- 1910.272(d) and (i)(2), Grain Handling Facilities
- 1910.1047(h), Ethylene Oxide (EtO)
- 1910.1050(d), Methylenedianiline (MDA)
- 1910.1051(j), 1,3-Butadiene

## EAP Requirements

The minimum key elements of the EAP must include:

- Procedures for reporting a fire or other emergency
- Procedures for emergency evacuation/escape, including type of evacuation and exit route assignments
- Procedures to be followed by employees who remain to operate critical plant operations before evacuating the facility
- Procedures to account for all employees after evacuation has been completed
- Procedures to be followed by employees performing rescue or medical duties
- The names or regular job titles or departments who may be contacted by employees who may need more information or explanation of their duties under the plan

As these standards overlap in several areas, many persons think that they are one in the same.

## EAP Required Training

Each employer/client before implementing the EAP must:

- Designate and train a sufficient number of persons/employees to assist in a safe and orderly evacuation or other employees and occupants of the facility
- Advise each employee of their responsibility under the plan at the initial development of the plan, whenever an employee's responsibilities or designate actions under the plan change, or whenever the plan changes

- Review the plan with each employee upon initial assignment the parts of the plan the employee must know to protect themselves in the event of an emergency

*Note: For those employers that have 10 or less employees the plan may be communicated orally to the employees and the employer does not need to maintain a written plan.*

If an EAP site does not need to have a written plan because there are less than 10 client employees at the site, Paragon Management is to get the information from the client and indicate the information in the site Post Orders. If a client site that falls under one of these standards has more than 10 employees does not have a site specific written EAP in place, until such time as the client provides Paragon with the site EAP an Emergency Egress plan will be put together. Paragon will train all officers upon initial assignment to the facility on the temporary Egress Plan which includes the facility alarm system, what their roles and responsibilities are regarding activation of and response to the alarm system and the specific actions that they are to take during the emergency and evacuation process.

Then upon receipt of a written EAP from the client, Officers will receive additional training regarding officer roles and responsibilities for emergency shutdowns, rescue or medical treatments if contractually agreed upon as services to be provided for the client or whenever their responsibilities change or the plan is changed by the client.

An example template of an EAP is provided in Section 11(b) of the Safety Manual.

## **Employee Alarm System**

Both plans require that each facility owner must have and maintain an employee alarm system, and the alarm system must use a distinctive signal (e.g. horns, blasts, sirens, or public address systems) for each purpose that will alert facility occupants and/or fire brigade members. All Paragon officers upon initial assignment to a facility will be given the information on the client's site specific alarm system.

## **Plan application**

OSHA contends that emergency preparedness is a means for protecting workers' safety and health, and that a site emergency egress plan is an "action plan" to organize employer and employee actions during workplace emergencies. Therein, well-developed plans and proper emergency egress plans and proper employee training will result in fewer injuries during emergencies during an emergency and help to eliminate disorganization evacuation or emergency response which results in confusion, injury or property damage.

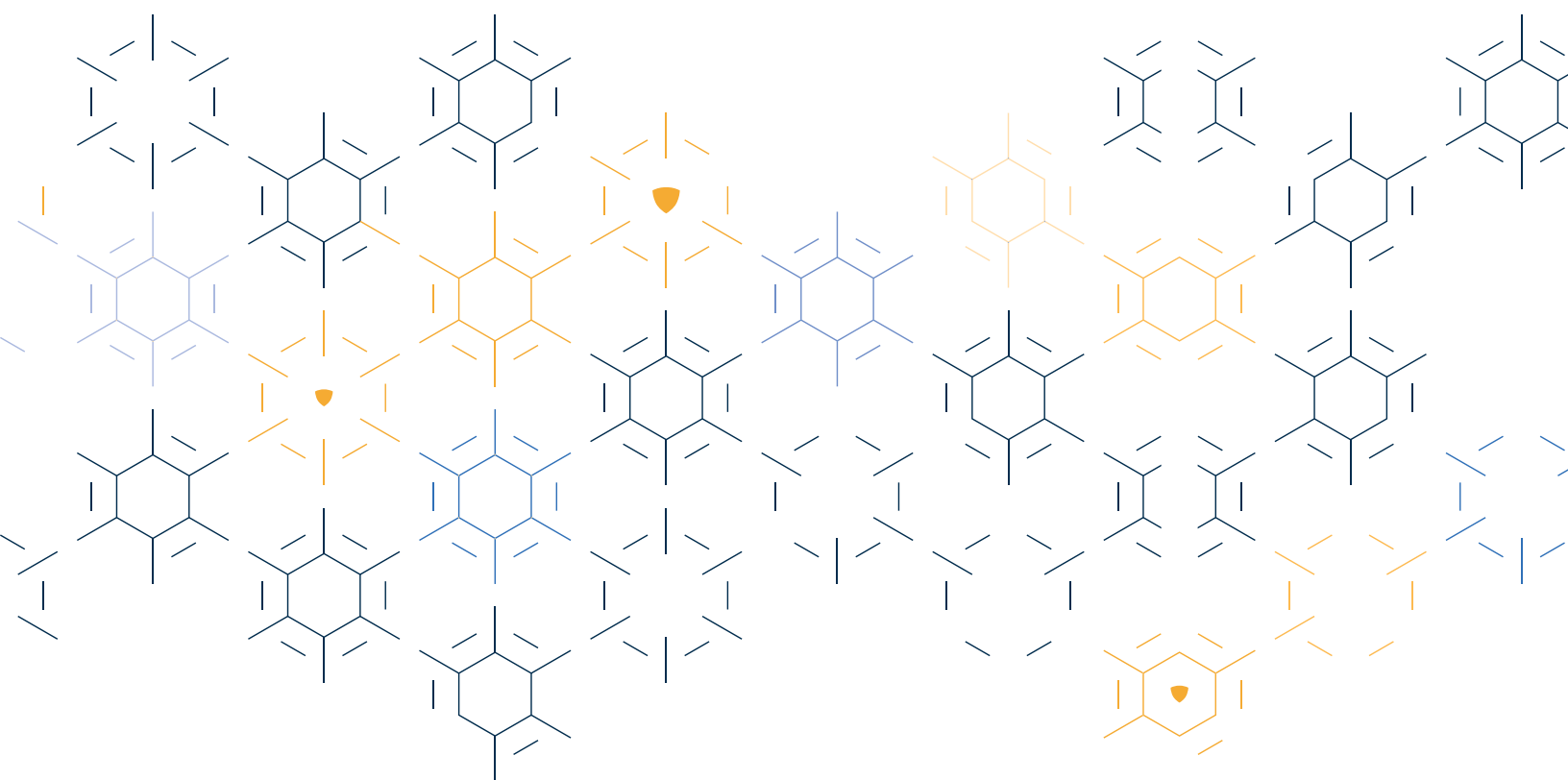
As the workplace egress plans are the facility owner's responsibility, Paragon will obtain the site's emergency egress plan from the client, follow, and train all officers on all points of the site specific egress plan. The Egress Plan is to be available in the site post orders, and will at a minimum include emergency contact numbers, site name, site address, site GPS coordinates, egress alarm system definitions, diagrams from the client that indicate evacuation routes, exits, and assembly locations. Emergency Egress plans are to be noted in the Site Post Orders.

If any employer/client facility falls under one of the standards that required the client to have a written Emergency Action Plan in place, it must be available to all employees for review. Upon initially providing services to a client facility that falls under the EAP requirements, Paragon will obtain a copy of the Client's EAP and will follow the client's site specific action plan. As part of the Officer

on-site training, the Client's EAP will be reviewed with specific reference to the assigned roles, responsibilities, and actions that Officers must take during an emergency response. This will also be noted in the Site Post Orders.

## Summary

Emergency Egress Plans are to be in place for each workplace and Emergency Action Plans are to be in place for all client facilities where specifically indicated under the OSHA standards that require them. **Both plans are the responsibility of the facility owner.** Upon receiving a contract to provide security services at any site, Paragon Management is to obtain a copy of the client's site specific Egress Plan or Emergency Action Plan and train all officers assigned to the location on each of the key elements of the site specific plan. As a minimum officers are to be given all the procedures to be followed for reporting a fire, what the alarm system sounds/signals are, emergency plans for evacuation, and where assembly areas for accounting for evacuees are located.



# 11A EMERGENCY EGRESS PLAN TEMPLATE

## Emergency Egress Plan For:

Facility Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Facility GPS Coordinates: Latitude (N-S) \_\_\_\_\_ Longitude (E-W) \_\_\_\_\_

Prepared By: \_\_\_\_\_ Date Prepared: \_\_\_\_\_

## Emergency Personnel Contact Names and Phone Numbers

Designated Responsible Official (Highest Ranking Client Manager at site):

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

## Emergency Coordinator:

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

## Egress/Evacuation Routes

Evacuation route maps have been posted in each work area. Site personnel should know at least two evacuation routes. The following information is marked on evacuation maps: (Note: Evacuation maps or diagrams for this facility are to be obtained from the client/building owner and attached to this document.)

- Emergency exits
- Primary and secondary evacuation routes
- Locations of fire extinguishers
- Fire alarm pull stations' location
- Assembly points

## Emergency Phone Numbers

Fire Department: \_\_\_\_\_

Paramedics/EMTs: \_\_\_\_\_

Ambulance: \_\_\_\_\_

Police/Sheriff: \_\_\_\_\_

Hospital: \_\_\_\_\_

Federal Protective Service: \_\_\_\_\_

Security Supervisor/Manager: \_\_\_\_\_

Building Manager (If applicable): \_\_\_\_\_

*Note: Add additional numbers as needed*

\_\_\_\_\_

## Emergency Evacuation Alarm System

Alarm system must use a distinctive signal (e.g. horns, blasts, sirens, or public address systems) for each purpose. The alarm system at this facility consists of the following: \_\_\_\_\_

\_\_\_\_\_  
The signals for this facility are as follows: (Add description of signal and what action is to be taken when the signal is given e.g. Continuous Blast = Evacuation, 2 Blast with break in between = Take Shelter, or 3 Blasts = All Clear etc.)

_____	=	_____
_____	=	_____
_____	=	_____
_____	=	_____
_____	=	_____
_____	=	_____

## Emergency Reporting and Evacuation Procedures

Types of emergencies that are to be reported to Site Personnel are:

- Medical Emergency
- Fire Emergency
- Extended Power Loss
- Chemical Spill
- Other (Specify) \_\_\_\_\_  
(e.g., terrorist attack/hostage taking)
- Bomb Threat
- Severe Weather
- Critical Operations

*Note: This form is to be attached to the site Post Orders. If all this information is already in the site-specific Post Orders this form is not needed.*

## EGRESS/EVACUATION TRAINING

The following personnel have been trained to in the site specific safe and orderly emergency egress/evacuation procedures at this facility.

Facility: \_\_\_\_\_

Name	Job Title	Date Trained
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____



## 11A.1 EMERGENCY EGRESS PLAN TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the Emergency Egress Plan as required per Federal OSHA Regulations CFR 1910.39 and Cal OSHA Title 8 Regulations CCR 3220 & CCR 5192.

---

Employee Name (Print)

---

Date

---

Employee Signature

---

Instructor/Trainer Name:

cc: Personnel Filecc: Personnel File

# 11B EMERGENCY ACTION PLAN TEMPLATE

## Emergency Egress Plan For:

Facility Name: \_\_\_\_\_

Facility Address: \_\_\_\_\_

Facility GPS Coordinates: Latitude (N-S) \_\_\_\_\_ Longitude (E-W) \_\_\_\_\_

Prepared By: \_\_\_\_\_ Date Prepared: \_\_\_\_\_

## Emergency Personnel Contact Names and Phone Numbers

Designated Responsible Official (Highest Ranking Client Manager at site):

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

## Emergency Coordinator:

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

## Area /Floor Monitors (If applicable)

Area/Floor: \_\_\_\_\_ Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Area/Floor: \_\_\_\_\_ Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

## Assistants to Physically Challenged (If applicable):

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Name: \_\_\_\_\_ Phone #: \_\_\_\_\_

Date last updated: \_\_\_\_\_

## Evacuation Routes

Evacuation route maps have been posted in each work area. Site personnel should know at least two evacuation routes. The following information is marked on evacuation maps: (Note: Attach copies of maps to this document)

- Emergency exits
- Primary and secondary evacuation routes
- Locations of fire extinguishers
- Fire alarm pull stations' location
- Assembly points

## FIRE EMERGENCY

### When fire is discovered:

- Activate the nearest fire alarm (If installed in facility)
- Notify the local Fire Department by calling: \_\_\_\_\_

### Provide the following information:

- Type of Emergency
- Location of emergency (Address, Site GPS Coordinates if calling from a cell phone, building, room number), and
- Your name, and phone number from which you are calling
- Stay on the line until contact has indicated all information has been recorded

If alarm is not available, notify site personnel about the fire emergency by the following means (Check all applicable):

- ☐ Voice Communication
- ☐ Phone paging
- ☐ Radio
- ☐ Other (Specify): \_\_\_\_\_

### Fight fire ONLY if:

- The Fire Department has been notified
- Fire is small (incipient stage) in not spreading to other areas
- The personnel are trained on the type of fire extinguishers to be used, fire extinguisher is in working condition, and personnel are trained on how to use the
- Escaping the area is possible by backing up to nearest exit

### Upon being notified about the fire emergency, occupants must:

- Leave the building using the designated escape routes
- Assemble in the designated areas (specify locations): \_\_\_\_\_
- Remain outside in designated area until the competent authority (designated official or designee) announces that it is safe to reenter.

### Designated Official, Emergency Coordinator or Supervisors must: (underline applicable)

- Disconnect utilities and equipment unless doing so jeopardizes his/her safety
- Coordinate an orderly evacuation of personnel
- Perform an accurate head count of personnel reported to the designated area
- Provide the Fire Department personnel with the necessary information about the facility
- Determine a rescue method to locate missing personnel
- Perform assessment and coordinate weather forecast office emergency closing procedures

**Area/Floor Monitors must:**

- Ensure that all employees and building occupants have evacuated the area/floor/building
- Report any problems to Emergency Coordinator at the assembly area

**Assistants to Physically Challenged should:**

- Assist physically challenged personnel in emergency evacuation from facility or to safe areas

## EXTENDED POWER LOSS

In the event of extended power loss to a facility certain precautionary measures should be taken depending on the geographical location and environment of the facility:

- Unnecessary electrical equipment and appliances should be turned off in the event that power restoration would surge causing damage to electronics and effecting sensitive equipment
- Facilities with freezing temperatures should turn off and drain the following lines in the event of a long-term power loss:
  - » Fire sprinkler systems
  - » Standpipes
  - » Potable water lines
  - » Toilets
- Add propylene-glycol to drains to prevent traps from freezing
- Equipment that contains fluids that may freeze due to long term exposure to freezing temperatures should be moved to heated areas, drained of liquids, or provided with auxiliary heat sources

Upon Restoration of heat and power:

- Electronic equipment should be brought up to ambient temperatures before energizing to prevent condensate from forming on circuitry
- Fire and potable water piping should be checked for leaks from freeze damage after the heat has been restored to the facility and water turned back on

## CHEMICAL SPILL

**The following are the locations of:**

- Spill Containment and Security Equipment:

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- Personal Protective Equipment (PPE):

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- Safety Data Sheets (SDS):

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**When a large chemical spill has occurred:**

- Immediately notify the site designated official and Emergency Coordinator
- If trained, contain the spill with available equipment (e.g. pads, booms, absorbent material etc.)
- Secure the area and alert site personnel
- Do Not attempt to clean the spill unless trained to do so
- Attend to injured personnel and all the medical emergency number if require
- Evacuate building/facility if necessary
- Call a Site Management to have them call an area spill clean-up firm or the Fire Department (if this has been arranged) to perform a large chemical spill clean-up

Name of spill clean-up firm: \_\_\_\_\_ Phone #: \_\_\_\_\_

**When a small chemical spill has occurred:**

- Notify the site Emergency Coordinator and/or Supervisor
- If toxic fumes are present, secure the area to prevent other personnel from entering the area using caution tape or cones
- Deal with the spill in accordance with the instructions indicated in the Safety Data Sheets for the chemical
- Small spills must be handled in a safe manner, and proper PPE shall be worn
- Review the general spill clean-up procedures

**TELEPHONE BOMB THREAT CHECKLIST****Instructions:**

Upon receiving the Officer should:

- Remain calm
- Be courteous
- Listen (to the caller and for any background noises)
- Do not interrupt the caller
- Use this form to document information

Officer Name: \_\_\_\_\_ Time: \_\_\_\_\_ Date: \_\_\_\_\_

Caller's Identity – Sex: \_\_\_ Male, \_\_\_ Female, \_\_\_ Adult, \_\_\_ Juvenile, Approximate Age \_\_\_\_\_

Origin of call: \_\_\_ Local, \_\_\_ Long Distance, \_\_\_ Telephone booth/pay phone

**Caller Characteristics: (indicate all that apply)**

*Voice Characteristics:*

- ☐ Loud
- ☐ Soft
- ☐ High Pitched
- ☐ Deep
- ☐ Raspy
- ☐ Pleasant
- ☐ Intoxicated

Other: \_\_\_\_\_

*Speech:*

- ☐ Fast
- ☐ Slow
- ☐ Distinct
- ☐ Distorted
- ☐ Stutter
- ☐ Nasal
- ☐ Slurred

Other: \_\_\_\_\_

*Language:*

- ☐ Excellent
- ☐ Good
- ☐ Fair
- ☐ Poor
- ☐ Foul

Other: \_\_\_\_\_

*Accent:*

- ☐ Local
- ☐ Not Local
- ☐ Foreign
- ☐ Region
- ☐ Race

Other: \_\_\_\_\_

*Manner:*

- ☐ Calm
- ☐ Angry
- ☐ Rational
- ☐ Irrational
- ☐ Coherent
- ☐ Incoherent
- ☐ Deliberate
- ☐ Emotional
- ☐ Righteous
- ☐ Laughing

*Background Noises:*

- ☐ Factory
- ☐ Trains
- ☐ Machines
- ☐ Animals
- ☐ Music
- ☐ Quiet
- ☐ Office
- ☐ Voices
- ☐ Airplanes
- ☐ Street/Traffic
- ☐ Party
- ☐ Atmosphere

## Bomb Facts:

Pretend difficulty hearing the caller, keep caller talking, and if caller seems agreeable to further the conversation, ask questions like:

- When will bomb go off? Certain hour \_\_\_\_\_ Time remaining \_\_\_\_\_
- Where is bomb located? Building \_\_\_\_\_ Area \_\_\_\_\_
- What kind of bomb? \_\_\_\_\_
- What kind of package? \_\_\_\_\_
- How do you know so much about the bomb? \_\_\_\_\_
- What is your name and address? \_\_\_\_\_
- If building is occupied, inform caller that detonation could cause injury or death
- Activate malicious call trace: Hang up phone and do not answer another line. Chose same line and dial \*57 (If your phone system has this capability). Listen for confirmation announcement and hang up.
- Call Site Management at \_\_\_\_\_ and relay information about call
- Did the caller appear familiar with the plant/building/facility (by his/her description of the bomb location)? \_\_\_\_ Yes \_\_\_\_ No
- Write out the message in its entirety and any other comments below.
- Notify your supervisor immediately.

Message as given by caller:

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## SEVERE WEATHER AND NATURAL DISASTERS

### Tornado:

- When a warning is issued by sirens or other means, seek inside shelter
- Consider the following:
- Small interior rooms on the lowest floor and without windows
- Hallways on the lowest floor away from doors and windows. And
- Rooms constructed with reinforced concrete, brick, or block with no windows
- Stay away from outside walls and windows



- Use arms to protect head and neck
- Remain sheltered until the tornado threat is announced to be over

### **Earthquake:**

- Stay calm and await instructions from the Emergency Coordinator or designated official
- Keep away from overhead fixtures, windows, filing cabinets, and electrical power
- Assist people with disabilities in finding a safe place
- Evacuate as instructed by the Emergency Coordinator or designated official

### **Flood:**

If indoors:

- Be ready to evacuate as directed by Emergency Coordinator or designated official
- Follow the recommended primary or secondary evacuation routes

If outdoors:

- Climb to high ground and stay there
- Avoid walking or driving through flood water
- If in a vehicle and it stalls, abandon it immediately and climb to higher ground

### **Hurricane:**

Watch and Warning issuing:

- The nature of a hurricane provides for more warning than other natural and weather disasters. A hurricane **watch** is issued when a hurricane becomes a threat to a coastal area. • A hurricane **warning** is issued when hurricane winds of 74 mph or higher, or combination of dangerously high water and rough seas are expected in the area within 24 hours.

Once a hurricane watch has been issued:

- Stay calm and await instructions from the Emergency Coordinator or designated official
- Moor any boats securely, or move to a safe place if time allows
- Continue to monitor local TV and radio stations for instructions
- Move early out of low-lying area or from the coast, at the request of officials
- If on high ground, away from the coast and plan to stay, secure the building, move all loose items indoors and board up windows and openings
- Collect drinking water in appropriate containers

Once a hurricane warning has been issued:

- Be ready to evacuate as directed by the Emergency Coordinator or designated official
- Leave areas that might be affected by storm tide or stream flooding

During a hurricane:

- Remain indoors and consider the following:
  - » Small interior rooms on the lowest floor and without windows
  - » Hallways on the lowest floor away from doors and windows, and
  - » Rooms constructed with reinforced concrete, brick, or block with no windows

## **Blizzard:**

If indoors:

- Stay calm and await instructions from the Emergency Coordinator or designated official
- Stay indoors!
- If there is no heat:
  - » Close off unneeded rooms and areas
  - » Stuff towels or rags in cracks under doors
  - » Cover windows at night
- Eat and drink, food provides the body with energy and heat. Fluids prevent dehydration.
- Wear layers of loose-fitting, light-weight, warm clothing if available

If outdoors:

- Find a dry shelter
- Cover all exposed parts of the body
- If shelter is not available:
  - » Prepare a lean-to, wind break, or snow cave for protection from the wind
  - » Build a fire for heat with rocks placed around fire to absorb/reflect heat and to attract attention
  - » Do not eat snow as it will lower your body temperature, always melt it first

If stranded in a car or truck:

- Stay in the vehicle
- Run the motor about ten minutes each hour
- Open windows a little for fresh air to avoid carbon monoxide poisoning
- Make sure the exhaust pipe is not blocked
- Make yourself visible to rescuers by:
  - » Turning on dome light at night when running the engine
  - » Tying a colored cloth to you antenna or door
  - » Raising the hood after snow stops falling
- Exercise to keep blood circulating and to keep warm

## CRITICAL OPERATIONS

During some emergency situations, it will be necessary for some specially assigned personnel to remain at the work areas to perform critical operations. The assignments are as follows:

Work Area	Name or Job Title	Description of Assignment
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

- Personnel involved in critical operations may remain on the site upon the permission of the Emergency Coordinator or designated official
- In case an emergency situation will not permit any of the personnel to remain at the facility, the Emergency Coordinator or designated official or other assigned personnel shall notify the appropriate \_\_\_\_\_ offices to initiate backups. This information can be obtained from the Emergency Evacuation Procedures which are located at: \_\_\_\_\_

The following offices are to be contacted:

Name/Location: \_\_\_\_\_ Phone #: \_\_\_\_\_

Name/Location: \_\_\_\_\_ Phone #: \_\_\_\_\_

Name/Location: \_\_\_\_\_ Phone #: \_\_\_\_\_

## EVACUATION TRAINING

The following personnel have been trained to in the safe and orderly emergency evacuation of other employees and physically challenged:

Facility: \_\_\_\_\_

Name	Job Title	Responsibility
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

## 11B.1 EMERGENCY ACTION PLAN TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the Emergency Action Plan as required per Federal OSHA Regulations CFR 1910.38 and Cal OSHA Title 8 Regulations CCR 3220.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name:

cc: Personnel File



## SECTION 12

# **Blood Borne Pathogens (BBP)**

Infectious Disease Exposure Control Plan  
and Training Program

# Blood Borne Pathogens (BBP): Infectious Disease Exposure Control Plan and Training Program

## Introduction

The Occupational Safety and Health Administration's (OSHA) goal is to regulate facilities where work is carried out... to promote safe work practices in an effort to minimize the incidents of illness and injury experienced by employees. Relative to this goal, OSHA enacted the Blood borne Pathogens Standard, 29 CFR 1910.1030. The purpose of the Blood borne Pathogens Standard is to "reduce occupational exposure to Hepatitis B Virus (HBV), Hepatitis C Virus (HCV), Human Immunodeficiency Virus (HIV) and other blood borne pathogens" employees may encounter in the workplace. Each employer having an employee(s) with occupation exposure shall establish a written Exposure Control Plan designed to eliminate or minimize employee exposure. The copy of the plan is to be accessible to employees, and shall 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.

Paragon believes there are a number of good general principles that should be followed when working with blood borne pathogens:

- It is prudent to minimize all exposure to blood borne pathogens
- Risk of exposure to blood borne pathogens should never be underestimated
- District Offices have instituted as many work practices and engineering controls as possible to eliminate or minimize employee exposure to blood borne pathogens

This Exposure Control Plan has been implemented to meet the letter and intent of the OSHA Blood borne Pathogens Standard. The objective of the plan is twofold:

- To protect employees from the health hazards associated with blood borne pathogens
- To provide appropriate treatment and counseling should an employee be exposed to blood borne pathogens

This program is designed for a District Office to either lift the text or, print and fill in the blanks, in order to establish the person(s) responsible for the programs, training, maintenance and management.

## General Program Management

### Responsible Persons

There are four major "Categories of Responsibility" that are central to the effective implementation of this Exposure Control Plan. These are:

- The "Exposure Control Officer"
- District, Program Manager and Supervisors
- Education/Training Instructors
- Our Employees

The following sections define the roles played by each of these groups in carrying out our plan.

(Throughout the written plan, employee's specific responsibilities are identified. If, because a promotion or other reasons, a new employee is assigned any of these responsibilities, the District Office is to be notified of the change, so their records can be updated.)

## Exposure Control Officer

The "Exposure Control Officer" will be responsible for overall management and support of the company's Blood borne Pathogens Compliance Program. Activities that are delegated to the Exposure Control Officer typically include, but are not limited to:

- Overall responsibility for implementing the Exposure Control Plan for the entire operation
- Working with management and other employees to develop and administer any additional blood borne pathogens related policies and practices needed to support the effective implementation of the plan
- At least annually reviewing and updating of the Exposure Control Plan 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
- Looking for ways to improve the Exposure Control Plan, as well as to revise and update the plan when necessary
- Collecting and maintaining a suitable reference library on the Blood borne Pathogens Standard and blood borne pathogens safety and health information
- Knowing current legal requirements concerning blood borne pathogens
- Acting as our company's liaison during OSHA inspections
- Conducting periodic audits to maintain an up-to-date Exposure Control Plan

\_\_\_\_\_ has been appointed as the District Office's Exposure Control Officer.

- The Exposure Control Officer will require assistance in fulfilling his/her responsibilities. To assist him/her in carrying out his/her duties, an Exposure Control Committee has been created and composed of the following people
- (Note: If no committee is to be established, write in "No committee established"):
- Exposure Control Committee

» \_\_\_\_\_

» \_\_\_\_\_

» \_\_\_\_\_

» \_\_\_\_\_



## District/Program Managers

Area, District Office Managers and Supervisors are responsible for exposure control in their respective offices. They work directly with the Exposure Control Officer and Paragon employees to ensure that proper exposure control procedures are followed.

## Education/Training Coordinator

The Education/Training Coordinator will be responsible for providing information and training to all employees who have the potential for exposure to blood borne pathogens. Activities falling under the direction of the Coordinator include:

- Maintaining an up-to-date list of personnel requiring training (in conjunction with management)
- Developing suitable education/training programs
- Scheduling periodic training documentation such as “sign-in sheets”, quizzes, etc.
- Periodically reviewing the training programs with other Exposure Control Officers, Area, District Director and Supervisors to include appropriate new information
- \_\_\_\_\_ has been selected to be the group’s Education/Training Coordinator.

## Employees

Paragon employees that have the potential for exposure have the most important role in this blood borne pathogens compliance program, for the ultimate execution of much of the Exposure Control Plan rests in their hands. In this role they must do things such as:

- Know what tasks they perform and which have occupational exposure to BBPs
- Attend the blood borne pathogens training sessions
- Plan and conduct all operations in accordance per designated work practice controls
- Develop good personal hygiene habits

## Availability of the Exposure Control Plan to Employee’s

To help them with their efforts, this Exposure Control Plan is available to the employees at any time. Employees are advised of this availability during their education/training sessions. Copies of the Exposure Control Plan are kept in the following locations:

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## Review and Update of the Plan

It is important to keep this Exposure Control Plan up-to-date. Therefore the plan will be reviewed and updated under the following circumstances:

- ***Annually, on or before February 1 of each year***

- Whenever new or modified tasks and procedures are implemented which affect occupational exposure of our employees
- Whenever employees' jobs are revised such that new instances of occupational exposure may occur
- Whenever new functional positions are established within operations that may involve exposure to blood borne pathogens

## Exposure Determination

The key to implementing a successful Exposure Control Plan is to identify exposure situations employees may encounter. To facilitate this in our operations, the following list has been prepared:

- Job Classifications in which all employees have occupational exposure to blood borne pathogens
- Job Classifications in which some employees have occupational exposure to blood borne pathogens
- A list of all tasks and procedures in which occupational exposure to blood borne pathogens occur (these tasks and procedures are performed by employees in the job classification shown on the two previous lists)

**This exposure determination shall be made without regard to the use of personal protective equipment (PPE).**

\_\_\_\_\_ will work with supervisors to revise and update these lists as employee tasks, procedures, and classification change.

## JOB CLASSIFICATIONS IN WHICH ALL EMPLOYEES HAVE EXPOSURE TO BLOOD BORNE PATHOGENS

Below are listed the job classifications in which all employees may come into contact with human blood or other potentially infectious materials, which may result in possible exposure to blood borne pathogens:

### JOB TITLE

### LOCATION

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**JOB CLASSIFICATIONS IN WHICH SOME EMPLOYEES HAVE EXPOSURE TO BLOODBORNE PATHOGENS**

Below are listed the job classifications in which some employees may come into contact with human blood or other potentially infectious materials, which may result in possible exposure to blood borne pathogens:

JOB TITLE	LOCATION

**WORK ACTIVITIES INVOLVING POTENTIAL EXPOSURE TO BLOODBORNE PATHOGENS**

Below are listed the tasks and procedures in our operations where employees may come into contact with human blood or potentially infectious materials which may result in exposure to blood borne pathogens:

TASK/PROCEDURE	JOB CLASSIFICATION	LOCATION

**Methods of Compliance**

There are a number of areas that must be addressed to effectively eliminate or minimize exposure to blood borne pathogens in our operations. The first five areas that deal with this in the plan are:

- The use of Universal Precautions
- Establishing appropriate Engineering Controls
- Implementing appropriate Work Practice Controls
- Using necessary Personal Protective Equipment
- Implementing appropriate Housekeeping Procedures

Each of these areas is reviewed with employees during their blood borne pathogens related training (See the “Information and Training” section of this plan for additional information). By rigorously following the requirements of OSHA’s Blood borne Pathogens Standard in these five areas, it will either eliminate or minimize employee occupational exposure to blood borne pathogens as much as is possible.

# Universal Precautions

The use of “Universal Precautions” has been put in place and fully endorsed. Therefore all human blood and body fluids such as semen and vaginal secretions will be treated as if they are known to be infectious for HBV, HCV, HIV and other blood borne pathogens.

In circumstances where it is difficult or impossible to differentiate between body fluid types, all body fluids will be assumed as potentially infectious.

\_\_\_\_\_ is responsible for overseeing our Universal Precautions Program.

## Engineering Controls

One of the key aspects of this Exposure Control Plan is the use of Engineering Controls to eliminate or minimize employee exposure to blood borne pathogens. As a result, Employees are to use cleaning, maintenance, and other equipment that is designed to prevent contact with blood or other potentially infectious materials.

\_\_\_\_\_ periodically works with the manager and supervisors to review tasks and procedures performed in the operations where engineering controls can be implemented or updated. As part of this effort, a survey was completed on \_\_\_\_\_ identifying three things:

- Operations where engineering controls are currently employed
- Operations where engineering controls can be updated
- Operations currently not employing engineering controls, but where engineering controls could be beneficial

The results of this survey can be found on the following pages. Each of these lists is to be re-examined during the annual Exposure Control Plan review, and opportunities for new or improved engineering controls are identified. Any existing engineering control equipment is also reviewed for proper function and needed repair or replacement every \_\_\_\_\_ months to ensure the effectiveness of the program, in conjunction with the manager or supervisor where the equipment is located.

## ENGINEERING CONTROL EQUIPMENT

The following operations have, or should have, Engineering Control Equipment to eliminate or minimize employee exposure to blood borne pathogens. If equipment is needed but not yet available “None” is indicated in the “Control Equipment” column.

SITE	CONTROL EQUIPMENT	NEEDS UPDATING?	LAST REVIEW DATE
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

In addition to the engineering controls identified on these lists, the following operational engineering controls are to be used:

- Hand washing facilities (or antiseptic hand cleansers and towels or antiseptic towelettes), which are readily accessible to all employees who have the potential for exposure
- Secondary containers which are:
  - » Leak-proof
  - » Color-coded or labeled with a biohazard warning label
  - » Puncture-resistant, if necessary

## Work Practice Controls

In addition to engineering controls, a number of Work Practice Controls is used to help eliminate or minimize employee exposure to blood borne pathogens. Many of these Work Practice Controls have been in effect for some time.

The person in the area office who is responsible for overseeing the implementation of these Work Practice Controls is \_\_\_\_\_. He/she works in conjunction with area, District Directors and supervisors; and the group's training coordinators to effect this implementation.

The following Work Practice Controls have been adopted as part of the Blood borne Pathogens Compliance Program:

- Employees wash their hands immediately, or as soon as feasible, after contact with potentially contaminated gloves or other personal protective equipment.
- Following any contact of body areas with blood or any other infectious materials, employees wash their hands and any other exposed skin with soap and water as soon as possible. They also flush exposed mucous membranes with water.
- Employees should never be involved with the disposal of Biohazard waste (such as sharps, contaminated laundry, bandages, etc.) unless they have been specifically authorized by the area, District Director to do so and trained in specific work practice controls for handling.
- Eating, drinking, smoking, applying cosmetics or lip balm and handling contact lenses is prohibited in work areas where there is potential for exposure to blood borne pathogens.
- Food and drink is not kept in refrigerators, freezers, on countertops or in other storage areas where blood or other potentially infectious materials are present.
- All procedures involving blood or other infectious materials minimize splashing, spraying or other actions generating droplets of these materials.
- When a new employee is placed on sites where potential exposure exists, or an employee changes jobs to a potential exposure site, the following process takes place to ensure the new employee is trained in the appropriate work practice controls.
- The employee's job classification and the tasks and procedures that he/she will perform are checked against the Job Classifications and Task Lists which have been identified in the Exposure Control Plan as those in which occupational exposure occurs.
- If the employee is transferring from one job to another within the area, the job classifications and tasks/procedures pertaining to his/her previous positions are checked against these lists.

- Based on this “cross-checking”, the new job classifications and/or tasks and procedures, which will bring the employee into occupational exposure situations, are identified.
- The employee is then trained by the area office’s Training Coordinator or another instructor regarding any work practice controls with which the employee is not experienced.

## Personal Protective Equipment

Personal Protective Equipment is an employees’ “last line of defense” against blood borne pathogens. Because of this, the company provides (at no cost to our employees) the Personal Protective Equipment needed to protect themselves against such exposure. This equipment includes, but is not limited to:

- Gloves
- Safety glasses or Goggles
- Face shields/masks
- Masks and mouth respirators

Hypoallergenic gloves and similar alternatives are readily available to employees who are allergic to the gloves our company normally uses.

\_\_\_\_\_, working with the area’s District Director and supervisors, is responsible for ensuring all vehicles and sites areas have appropriate personal protective equipment available to employees.

Employees are trained regarding the use of the appropriate personal protective equipment for their job classifications and tasks/procedures they perform. Initial training about personal protective equipment will be completed in the office. Additional training is provided, when necessary, if an employee takes a new position or new job functions are added to his/her current position.

To determine whether additional training is needed, the employee’s previous job classification and tasks are compared to those for any new job or function the employee undertakes. The employee’s supervisor working with the office’s Training Coordinator provides any needed training.

To ensure personal protective equipment is not contaminated and is in the appropriate condition to protect employees from potential exposure, the following practices are adhered to:

- All personal protective equipment is inspected periodically and repaired or replaced as needed to maintain its effectiveness
- Single-use personal protective equipment (or equipment that cannot, for whatever reason, be decontaminated) is disposed of by placing in labeled biohazard bags and forwarding to \_\_\_\_\_
- To make sure the equipment is used as effectively as possible, employees shall adhere to the following when using their personal protective equipment:
  - » Any garments penetrated by blood or other infectious materials are removed immediately, or as soon as feasible
  - » All potentially contaminated personal protective equipment is removed in a Biohazard waste container prior to leaving a work area or accident/incident site, if possible (or as soon as feasible)

- » Gloves are worn in the following circumstances:
  - Whenever employees anticipate hand contact with potentially infectious materials
  - When handling or touching contaminated items or surfaces
- » Disposable gloves are replaced as soon as practical after contamination or if they are torn, punctured or otherwise lose their ability to function as an “exposure barrier”
- » Disposable gloves shall not be washed or decontaminated for re-use
- » Masks and eye protection (such as goggles, face shields, etc.) are used whenever splashes or sprays may generate droplets of infectious materials
- » Protective clothing (such as coats) is worn whenever potential exposure to the body is anticipated

## Housekeeping

Maintaining equipment in a clean and sanitary condition is an important part of the Blood borne Pathogens Compliance Program. To facilitate this, a written schedule has been set for checking and replacing the equipment. The schedule provided the following information (this schedule can be found on the following page).

- The equipment to be checked and/or replaced
- Day and time of scheduled work
- Any special instructions that is appropriate

Using this schedule, the office employs the following practices:

- All potentially contaminated equipment is cleaned and decontaminated after contact with blood or other potentially infectious materials:
  - » Immediately (or as soon as feasible) when equipment is overtly contaminated
  - » After any spill of blood or infectious materials
  - » At the end of the work shift if equipment may have been contaminated during that shift
- Protective coverings (such as linens, plastic trash bags wrap, aluminum foil or absorbent paper) are not to be handled or removed by unauthorized employees
- Potentially contaminated broken glassware is picked up using mechanical means (such as dust pan and brush, tongs, forceps, etc.)

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\_\_\_\_\_ is responsible for setting up our cleaning and decontamination schedule and making sure it is carried out within our operations.

Regulated Biohazardous waste is carefully handled (including disposed of personal protective equipment and other potentially infectious materials). The following procedures are used with all of these types of wastes:

- Contaminated laundry/clothing shall be placed and transported in bags or containers that are labeled or color-coded as a biohazard so employees are able to recognize the container as requiring compliance with Universal Precautions



- They are discarded or “bagged” in containers that are:
  - » Closable
  - » Puncture-resistant if the discarded materials have the potential to penetrate the container
  - » Leak-proof if the potential for fluid spill or leakage exists
  - » Red in color or labeled with the appropriate biohazard warning label
- Whenever contaminated laundry/clothing is wet and presents a reasonable likelihood of soak-through or leakage from the bag or container, the laundry shall be placed and transported in bags or containers which prevent soak-through and/or leakage of fluids to the exterior
- Whenever employees move containers of regulated waste from one area to another, the containers are immediately closed and placed inside an appropriate secondary container if leakage is possible from the first container
- The employer shall ensure that employees who have contact with contaminated laundry/clothing wear protective gloves and other appropriate PPE
- Containers for this regulated waste are placed in appropriate locations within easy access of the employees and as close as possible to the source of the waste
- Contaminated laundry, bandages, sharps, etc. of the Client, are not to be handled or disposed of by Paragon employees.

## Hepatitis B Vaccination

### Post Exposure Evaluation and Follow-up

Even with proper adherence to all our exposure prevention practices, it is recognized that exposure incidents can occur. As a result, a Hepatitis B Vaccination Program has been implemented and shall be made available to all employees who have occupational exposure to blood borne pathogens and post-exposure evaluation and follow-up to all employees who have had an exposure incident.

## Vaccination Program

To protect employees as much as possible from the possibility of Hepatitis B infection, a vaccination program has been implemented. This program is available, at no cost, to all employees who have potential occupational exposure to blood borne pathogens and to those who have been exposed to blood borne pathogens.

The Hepatitis B vaccination shall be made available after the employees have received the required training and **within 10 working days of initial assignment** to all employees who have occupational exposure unless the employee has previously received the complete Hepatitis B vaccination series, antibody testing has revealed that the employee is immune, or the vaccine is contraindicated for medical reasons. The participation in a prescreening program is not a prerequisite for receiving the Hepatitis B vaccination.

The vaccination program consists of a series of three inoculations over a six-month period. As part of their blood borne pathogens training, employees have received information regarding the Hepatitis B vaccination, including its safety and effectiveness.

\_\_\_\_\_ is responsible for setting up and operating our vaccination program.

Vaccinations are performed under the supervision of a licensed physician or other healthcare professional. Employees taking part in the vaccination program are listed on the following pages. Employees who have declined to take part in the program are listed as well. If the employee declines the vaccination, the employee is to sign the following federally required mandatory statement (See form Section 12a).

***“I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B Virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However I decline Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.”***

To ensure that all employees are aware of the vaccination program, it is thoroughly discussed during blood borne pathogens training. Vaccination Program Notices are posted in prominent places throughout the office.

If an employee is involved in an incident where exposure to blood borne pathogens may have occurred, there are two things which require immediate focus:

- Investigating the circumstances surrounding the exposure incident
- Making sure the employee receives medical consultation and treatment (if required) as expeditiously as possible.
- \_\_\_\_\_ investigates every exposure incident that occurs within operations. This investigation is initiated within 24 hours after the incident occurs and involves gathering the following information:
  - When the incident occurred
    - » Date and time
  - Where the incident occurred
  - What potentially infectious materials were involved in the incident
    - » Type of material
  - Source of the material
  - Under what circumstances the incident occurred
    - » Type work being performed
  - How the incident was caused
  - Personal protective equipment being used at the time of the incident
  - Actions taken as a result of the incident
    - » Employee decontamination
    - » Cleanup
    - » Notification made
    - » After this information is gathered, it is evaluated, a written summary of the incident and its causes is prepared and recommendations are made for avoiding similar incidents in the future (to help with this, use the “Incident Report Investigation Form”).

To make sure the employees receive the best and most timely treatment if an exposure to blood borne pathogens should occur; a comprehensive post-exposure evaluation and follow-up process has been set up. The “checklist” at the end of this section is used to verify all the steps in the process have been taken correctly. This process has been implemented and is overseen by the following people:

- \_\_\_\_\_
- \_\_\_\_\_

Much of the information involved in this process must remain confidential and everything possible will be done to protect the privacy of the employees involved.

As the first step in this process, an exposed employee will be provided with the following confidential information:

- Documentation regarding the routes of exposure and circumstances under which the exposure incident occurred
- Identification of the source individual (unless not feasible or prohibited by law)

Next, as soon as feasible, a test of the source individual’s blood, after consent is obtained, to determine HBV, HCV and HIV potential infection will be conducted unless the source individual is already known to be infected with HBV or HIV. This information will also be made available to the exposed employee, if it is obtained. At that time, the employee’s identity and infectious status of a source individual will be made.

Finally, the exposed employee’s blood will be collected and tested for HBV, HCV and HIV status if consent is obtained. Once these procedures have been completed, an appointment is arranged for the exposed employee with a qualified healthcare professional to discuss the employee’s medical status. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

## Information Provided to the Healthcare Professional

To assist the healthcare professionals, a number of documents will be forwarded to them, including the following:

- A copy of the Blood borne Pathogens Standard
- A description of the exposed employee’s duties as they relate to the exposure incident
- A description of the exposure incident, documentation of route(s) of exposure, and the circumstances under which the exposure incident occurred
- Results of the source individuals blood testing, if available
- The exposed employee’s relevant medical records
- Other pertinent information

## Healthcare Professional’s Written Opinion

After the consultation, the healthcare professional provides Paragon with a written opinion evaluating the exposed employee’s situation. In turn, a copy of this opinion is furnished to the exposed employee.

To maintain confidentiality, the written opinion will contain only the following information:

- Whether Hepatitis B Vaccination is indicated for the employee.
- Whether the employee has received the Hepatitis B Vaccination.
- Confirmation that the employee has been told about any medical conditions resulting from the exposure incident which requires further evaluation or treatment

All other findings or diagnoses will remain confidential and will not be included in the written report.

## Medical Recordkeeping

To make sure as much medical information is made available to the participating healthcare professional as possible, comprehensive employee medical records are maintained.

\_\_\_\_\_ is responsible for setting up and maintaining these records, which include the following information:

- Name of the employee
- Social Security number of the employee
- A copy of the employee's Hepatitis B Vaccination status
- Dates of any vaccinations
- Medical Records relative to the employee's ability to receive vaccination
- Copies of the results of the examinations, medical testing and follow-up procedures which took place as a result of an employee's exposure to blood borne pathogens
- A copy of the information provided to the consulting healthcare professional as a result of any exposure to blood borne pathogens

To keep the information in these medical records confidential this information will not be disclosed or reported to anyone without the employee's written consent (except as required by law).

Employee Medical Records shall be maintained for at least the duration of employment plus 30 years in accordance with the BBP Standard.

## Sharps Injury Log

The District Office shall establish and maintain a Sharps Injury Log, which is a record of each exposure incident involving a sharp. The information recorded shall include the following information, if known or reasonably available:

- Date and time of the exposure incident
- An explanation of how the incident occurred
- Type and brand of sharp involved in the exposure incident

A description of the exposure incident which shall include:

- Job classification of the exposed employee
- Department or work area where the exposure incident occurred

- The procedure that the exposed employee was performing at the time of the incident
- How the incident occurred
- The body part involved in the exposure incident
- If the sharp had engineered sharps injury protection, whether the protective mechanism was activated, and whether the injury occurred before the protective mechanism was activated, during activation of the mechanism or after activation of the mechanism, if applicable
- If the sharp had no engineered sharps injury protection, the injured employee's opinion as to whether and how such a mechanism could have prevented the injury
- The employee's opinion about whether any engineering, administrative or work practice control could have prevented the injury.

Each exposure incident shall be recorded on the Sharps Injury Log within 14 working days of the date the incident is reported to the employer.

The information in the Sharps Injury Log shall be recorded and maintained in such a manner as to protect the confidentiality of the injured employee.

## Labels and Signs

One of the warnings of possible exposure to blood borne pathogens is biohazard labels. Therefore, a comprehensive biohazard warning-labeling program is implemented using labels of the type shown below, or when appropriate, using red "color-coded" containers.

\_\_\_\_\_ is responsible for setting up and maintaining this program.  
The following items were labeled:

- Contaminated equipment
- Containers of regulated waste

On labels affixed to contaminated equipment the portions of the equipment that are contaminated will be indicated.

## Biohazard Labels

These signs shall be fluorescent orange-red or predominantly so, with lettering and symbols in a contrasting color.



- (Name of the Infectious Agent)
- (Special requirements)
- (Name, Telephone number of responsible person)

## Information and Training

Having well informed and educated employees is extremely important when attempting to eliminate or minimize the employee's exposure to blood borne pathogens. Because of this, all employees who have the potential for occupational exposure to blood borne pathogens are put through a comprehensive training program, at no cost to the employees, during working hours and furnished with as much information as possible at the time of initial assignment to tasks where occupational exposure may take place.

This program was set up so that employees with potential occupational exposure will receive the required training and will be retrained at least annually, within one year of their previous training, to keep their knowledge current. Additionally, all new employees, as well as employees changing jobs or job functions, will be given any additional training their new position requires at the time of their new job assignments.

\_\_\_\_\_ is responsible for seeing that all employees who have potential occupational exposure to blood borne pathogens participate and receive this training. The following instructors will assist them:

\_\_\_\_\_  
\_\_\_\_\_

## Training Topics

The topics covered in our training program include, but are not limited to, the following:

- The Blood borne Pathogens Standard itself
- The epidemiology and symptoms of blood borne diseases
- The modes of transmission of blood borne pathogens
- The Exposure Control plan and where employees can obtain a copy
- The appropriate methods for recognizing tasks and other activities that may involve exposure to blood and other potentially infectious materials
- A review of the use of limitations of methods that will prevent or reduce exposure, including:
  - » Engineering controls
  - » Work Practice controls
  - » Personal protective equipment
  - » Selection and use of personal protective equipment including:
    - » Types available
    - » Proper use
    - » Location at the client's site
    - » Removal
    - » Handling
    - » Decontamination
    - » Disposal

- » Visual warnings of biohazard on sites, including labels, signs and color-coded container
- » Information on the health risks, and prevention of the Hepatitis C Virus
- Information on the Hepatitis B Vaccine, including its:
  - » Efficacy
  - » Safety
  - » Method of Administration
  - » Benefits of Vaccination
  - » The District Office's free vaccination program
  - » Actions to take and persons to contact in an emergency involving blood or other potentially infectious materials
  - » The procedures to follow if an exposure incident occur, including the incident reporting
  - » Information that will be provided on the post-exposure evaluation and follow-up, including medical consultation
  - » The use of needleless systems and sharps devices with engineered sharps injury protection (ESIP), where appropriate

## Training Methods

The training presentations used to instruct officers include, but are not limited to several training techniques including those listed below:

- Video programs
- Training manuals/employee handouts
- Employee Review Sessions
- \_\_\_\_\_ (other, specify)

Because it is felt that employees need an opportunity to ask questions and interact with their instructors, time is specifically allotted for these activities in each training session.

## Recordkeeping

To facilitate the employee training, as well as to document the training process, training records containing the following information are maintained:

- Dates of all training sessions
- Contents/summary of the training sessions
- Names and qualifications of the instructors
- Names and job titles of employees attending the training sessions

The training forms and/or Paragon's computer system will be utilized to facilitate recordkeeping.

These training records are available for examination and copying to the employees and their representatives, as well as OSHA and its representatives. The training records shall be maintained for 3 years from the date on which the training occurred.

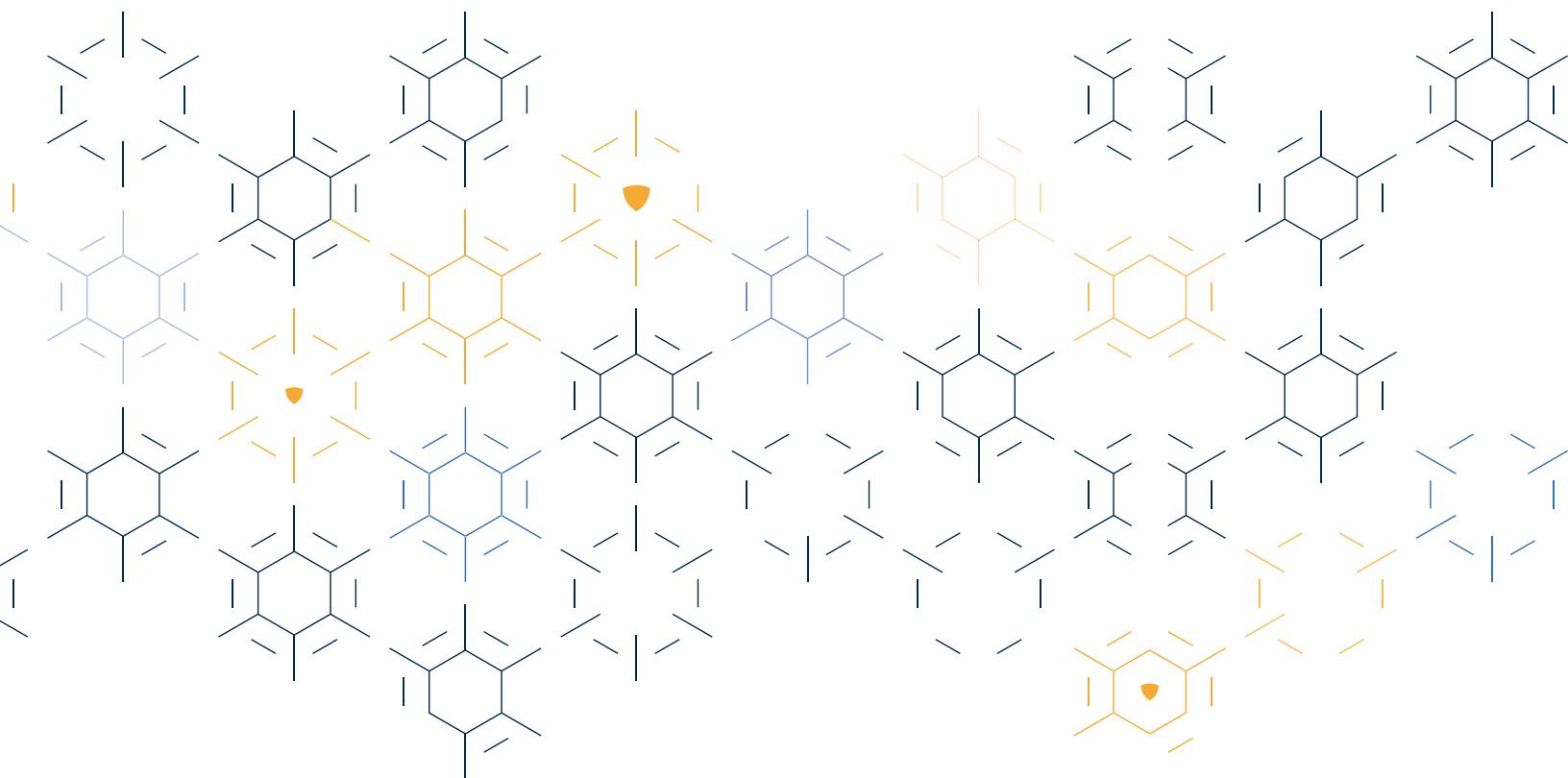


## Glossary of Terms

Biohazard Label	A label affixed to containers of regulated waste. The label must be fluorescent orange-red in color with the biohazard symbol and word biohazard on the lower part of the label.
Blood	Human blood, human blood components, and products made from human blood.
Blood borne Pathogens	Pathogenic microorganisms that are present in Pathogens human blood and can cause disease in humans. These pathogens include, but are not limited to, Hepatitis B Virus (HBV), Hepatitis C Virus (HCV) and Human Immunodeficiency Virus (HIV).
Contaminated	The presence or the reasonably anticipated presence of blood or other potentially infectious materials on an item or surface.
Contaminated Sharps	Any contaminated object that can penetrate the skin including, but not limited to, needles, scalpels, broken glass, or sharp objects.
Decontamination	The use of physical or chemical means to remove, inactivate, or destroy blood borne pathogens on a surface or item to the point where they are no longer capable of transmitting infectious particles and the surface or item is rendered safe for handling, use or disposal.
Employee	An individual posted at a healthcare, industrial or other site or operation that may be exposed to blood borne pathogens in the course of their assignments with Engineering Controls.
Engineering Controls	Controls (e.g. sharps disposal containers, self-sheathing needles, safer medical devices such as sharps with engineered sharps injury protection and needleless systems) that isolate or remove the blood borne pathogens hazard from the workplace.
Exposure Control Officer	An employee who is designated by this office and who is qualified by training or experience to provide technical guidance in development and implementation of the area office's Exposure Control Plan.
Exposure Control Plan	A written program developed and implemented by, which sets forth procedures by engineering controls, personal protective equipment, work practices and other methods that are capable of protecting employees from exposures to blood borne pathogens, and meets the requirements spelled out by the OSHA Blood borne Pathogens Standard.
Exposure Incident	A specific 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.
Hand Washing Facilities	A facility providing an adequate supply of running potable water, soap and single use towels or hot air drying machines.

HBV	Hepatitis B virus.
HCV	Hepatitis C virus.
HIV	Human Immunodeficiency Virus.
Licensed Healthcare Professional	A person whose legally permitted scope of practice allows him or her to independently perform the activities required by paragraph (f) "Hepatitis B Vaccination and Post-exposure Evaluation and Follow-up" of OSHA's Blood borne Pathogens Standard.
Medical Consultation	A consultation which takes place between an employee and a licensed healthcare professional for the purpose of determining the employee's medical condition resulting from exposure to blood or other potentially infectious materials, as well as any further evaluation or treatment that is required.
Occupational Exposure	Reasonable anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.
OSHA	Occupational Safety and Health Administration of the U.S. Department of Labor; the Federal agency with safety and health regulatory and enforcement authorities for most U.S. industry and business.
Other Potentially Infectious Materials	The following human body fluids: semen, vaginal secretions, cerebrospinal fluids, synovial fluid, pleural fluid, pericardial fluid, peritoneal fluid, amniotic fluid, saliva, any body fluid that is visibly contaminated with blood, and all body fluids in situations where it is difficult or impossible to differentiate between body fluids; any unfixed tissue or organ (other than intake skin) from a human (living or dead); HIV-containing cell or tissue cultures, organ cultures, and HIV- or HBV/HCV containing culture medium or other solutions; and blood, organs, or other tissues from experimental animals infected with HIV or HBV.
Parenteral	Piercing mucous membranes or the skin barrier through such events as needle sticks, human bites, cuts, and abrasions.
Personal Protective Equipment	Specialized clothing or equipment worn by an employee for protection against a hazard. General work clothes (e.g. uniforms, pants, shirts or blouses) not intended to function as protection against hazard is not considered to be personal protective equipment.
Regulated Waste	Liquid or semi-liquid blood or other potentially infectious materials; contaminated items that would release blood or other potentially infectious materials during handling; contaminated; and pathological and microbiological wastes containing blood or other potentially infectious materials.

Source Individual	Any individual, living or dead, whose blood or other potentially infectious materials may be a source of occupational exposure to the employee. Examples include, but are not limited to, hospital and clinic patients; clients in institutions for the developmentally disabled; trauma victims; clients of drug and alcohol treatment facilities, residents of hospices and nursing homes.
Sterilize	The use of a physical or chemical procedure to destroy all microbial life including highly resistant bacterial endospore.
Universal Precautions	An approach to infection control. According to the concept of Universal precautions, all human blood and certain body fluids are treated as if know to be infectious to HIV, HBV, HCV and other blood borne pathogens.
Work Practice Controls	Controls that reduce the likelihood of exposure by altering the manner in which a task is performed.



## 12A OFFER OF VOLUNTARY HEPATITIS B VACCINATION

### Employee Acknowledgement – If employee ACCEPTS the Hepatitis B Vaccination

*“I understand that being assigned as a Paragon Security Officer at \_\_\_\_\_ (Client Site), that as part of my assigned duties, I may have a potential for an occupational exposure to human blood or other potentially infectious materials, and that I may be at risk of acquiring Hepatitis B Virus (HBV) infection. I further acknowledge that I have been given the opportunity to be vaccinated with the Hepatitis B vaccine at no charge to myself.*

*I am signing this document without coercion of any nature and voluntarily agree to submit to the Hepatitis B vaccination.”*

Employees Name: \_\_\_\_\_ Date: \_\_\_\_\_

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### Employee Acknowledgement – If employee DECLINES the Hepatitis B Vaccination

*“I understand that due to my occupational exposure to blood or other potentially infectious materials I may be at risk of acquiring Hepatitis B Virus (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself. However I decline Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of acquiring Hepatitis B, a serious disease. If in the future I continue to have occupational exposure to blood or other potentially infectious materials and I want to be vaccinated with Hepatitis B vaccine, I can receive the vaccination series at no charge to me.”*

Employees Name: \_\_\_\_\_ Date: \_\_\_\_\_

## 12B BLOODBORNE PATHOGENS STANDARD REQUIREMENTS

### **Introduction:**

This document provides guidelines for meeting the requirements of the OSHA Blood Borne Pathogen (BBP) Standard.

### **Scope:**

The Blood Borne Pathogens Standard, 29 CFR 1910.1030, indicates that employers are to determine all job classifications in which all employees have occupational exposure to blood or other potentially infectious materials during an Exposure Incident which means specific eye, mouth, other mucous membrane, non-intact skin, or parenteral contact with blood or other potentially infectious materials that result from the performance of an employee's duties regardless of whether or not Personal Protective Equipment (PPE) is worn. If employees are determined to have a potential for exposure to BBPs they would fall under the BBP Standard.

With either the contractual agreement or agreed upon Post Orders that indicate the roles & responsibilities of officers is to be the provision of CPR, First Aid, handling of any sharps, clean-up of BBPs or any activity that have direct occupational exposure to BBPs, the Blood Borne Pathogens Standard goes into effect and requires the implementation of a written exposure control plan, documented training with annual refresher training, and the offer of a Hep B vaccination to the officers.

### **Procedure:**

At all sites where officer agreed upon provided roles & responsibilities are determined to have direct occupational exposure to BBPs a written infectious disease exposure control plan and training program needs to be put in place, including the provision the Hepatitis B vaccination program and a post exposure evaluation and follow-up.

## 12C BLOODBORNE PATHOGENS TRAINING ACKNOWLEDGEMENT

### PARAGON

To be completed by the employee prior to operating Segway Personal Transporter (PT) unit. After completing, this form should be submitted to the Human Resources Department for appropriate storage.

I acknowledge that I have received information and training on the Bloodborne Pathogens (BBP) Standard and the potential occupational exposure of as part of the assigned roles, responsibilities and tasks too be performed at the site being assigned. I have also been provided a copy of the Bloodborne Pathogens Standard and a review of the Site BBP Exposure Control Plan as required per Federal OSHA Regulations 29 CFR 1910.1030 and Cal OSHA Title 8 Regulations CCR 5193.

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Employee Name (Print)

---

Date

---

Employee Signature

---

Instructor/Trainer Name

cc: Personnel File



## SECTION 13

# Fire Safety Training Program



# Fire Safety Training Program

Paragon is firmly committed to a program which promotes the safety and livelihood of our employees, visitors and business objectives. The nature and depth of the Fire-Safety program must be developed for our employees specifically for each office and client site. As part of normal security operations, officers are not required to perform firefighting operations as they identify the situation, activate the alarms and make notifications, evacuate the premises and keep crowd control. Only when contractually agreed upon that officers will perform firefighting services, and use client provided fire extinguishers in the facility, is this service to be provided. This service will only be provided when officers have received a complete fire-safety training program that includes fire-safety education, fire prevention techniques and emergency response procedures. The program will familiarize the officers with the principles of fire extinguisher use and the hazards involved in incipient stage firefighting. This training will be provided prior to being assigned to the facility and refresher training will be provided annually.

## Sample Fire-Safety Program

This program should include classroom instruction which addresses emergency planning, fire hazard inspection procedures, facility design and safety features. Additionally, the classroom portion of the program will encompass recommended emergency response procedures, portable fire extinguisher, flammable liquids and basic firefighting principles. A portion of the program will be devoted to hands-on usage of fire extinguishers and orientation to the facility.

Program content will be reviewed periodically to ensure the client's needs are effectively met within the approved training period. Recommendations for program improvement will be discussed with the appropriate representative on an as needed basis.

### **Applicability:**

This policy is applicable to all personnel assigned to protect facilities of our clients.

### **Responsibility for Implementation:**

Management shall have responsibility for implementing an approved fire-safety training program and for the program's ongoing viability. The Area Vice President and District Director should ensure the program is conducted appropriately on a daily basis.

## Fire Prevention and Planning

### **Objective:**

Planning for an emergency prior to its occurrence is a crucial step to preventing the event and limiting the damage of the event once it has occurred. Personnel must plan for such an emergency by establishing preventative measures, monitoring and maintaining fire protective systems, and developing emergency response procedures.

The following variables should be incorporated into the emergency planning system for each facility:

- **Geographic Data:** This includes the response time of the local fire department, whether buildings are tightly grouped and other external hazards which should be noted
- **Structural Data:** Identify low, medium and high risk areas. Identify all fire-safety detection, prevention and response systems
- **Hazardous Materials Data:** This should include locations, types and quantities of all hazardous materials in the facility
- **Utility Control Data:** Determine the location and accessibility of shutoffs for fuel, electricity, water and oxygen systems
- **Life Safety Data:** Identify all primary means of egress (escape), lighting and emergency lighting systems, external emergency command posts and refuge areas inside the facility
- **Fire Protection Systems Data:** Record information concerning the facility's fire detection and fire suppression systems. If the facility is equipped with automatic sprinklers, note the location of valves, fire pumps and water supplies. Learn the system's manual testing, emergency activation and shut off procedures
- **Fire Fighting Equipment Data:** Identify the types and locations of portable and fixed firefighting equipment. This includes standpipe systems, their water supplies and fire extinguishers.
- With the above information, emergency egress plans or, if required by specific OSHA regulations, an emergency action plan can be developed

**Key Items not to forget or consider:**

- Assign emergency responsibilities
- Plan escape routes
- Develop emergency procedures
- Designate a safe location as an emergency command post
- Develop and post an emergency telephone contact list
- Designate an emergency leader for each suit
- Determine who will assist in evacuations
- Train all personnel
- Conduct regularly scheduled inspections

## Fire Hazard Inspection

**Objective:**

- The purpose of fire hazard inspections is to:
- Ensure enforcement of fire prevention rules
- Check the firefighting equipment
- To report fire detection, prevention and suppression system deficiencies



**Frequency:**

Fire hazard inspections will be formally conducted by employees on a weekly basis. Officers will also look for fire hazards, faulty equipment and systems on an on-going basis.

**Reporting System:**

Formal hazard inspections will be reported through the company's approved hazard checklist which is tailored to meet the client's specific needs and constraints. The surveying officer will sign and submit the checklist to a designated client representative in addition to providing the District Director with a copy of the report.

Daily observations of fire hazards and/or faulty systems will be reported to the client through the Officer's Daily Activity Report (DAR).

**Inspection Procedures:**

Officers shall perform the following tasks when conducting fire hazard inspections:

Manual test of fire alarm system (as authorized and if trained)

- Check sprinkler system standpipes and control valves
- Monthly visual check of fire extinguisher levels and verification that annual maintenance checks are/have been conducted if contractually required.
- Look for obstructed fire safety systems and equipment. This includes alarms, exits and directional signs, sprinklers and fire extinguishers

**Facility Design: Layout and Safety Features****Objective:**

Every Officer assigned to a client facility should have a thorough understanding of the facility in terms of design, layout and fire-safety features. Committing these variables to memory will help the Officer to act effectively and rapidly under emergency conditions.

**Key Elements:**

Analyze the facility floor plan to gain a conceptual understanding of each building in terms of exits, fire suppression equipment and storage locations housing emergency equipment.

Later, the supervisor should lead the officer on a physical inspection and orient the officer to the facility. These two approaches will increase knowledge about the facility and repetition will help retention of key elements longer.

When actually touring the facility, Officers are to look for the following items:

- Exits
- Emergency escape routes (e.g., stairways and perimeter exits)
- Fire extinguisher types and locations

- Location of firefighting equipment
- Communication systems - primary and backup
- Emergency contacts and telephone numbers
- Fire station location and telephone number
- Police station location and telephone number
- Ambulance service and telephone number
- Client contact and telephone number
- District Office contact and telephone number
- Sprinkler system controls and check-points
- Emergency lighting apparatus - location and operating instructions
- Emergency transportation alternatives
- First aid stations

### **Objectives:**

The following emergency procedures should be committed to memory and reviewed regularly to ensure preparedness in the event of fire. The steps listed below are prioritized depending on the particular needs of the emergency. Whatever problems the emergency presents, always remember to:

- Take The Initiative!
- Use Common Sense!
- Act Decisively!
- Speak Authoritatively!
- Move Quickly!

### **Emergency Procedures**

- Locate the fire
- Evacuate all personnel - This is the primary responsibility
- Trigger the alarm system
- Notify emergency contacts
- Only if trained, and only if contractually required, attack the fire at the incipient stage with extinguishers and equipment if possible and safe for officer to do so.
- Shut off power to machines and pipelines carrying flammable liquids
- Remove combustible materials if possible
- Close the doors and windows and shut off air conditioning to slow the fire
- Assist fire fighters by:
  - » Directing fire fighters to the scene of the fire (Note: This is to be done without the need of PPE. If not able to lead to area because of smoke or heat, Officer is to get as close as safely possible and then indicate to fire fighters the area where the fire is located)
  - » Identifying buildings with volatile materials
  - » Identifying the location of critical records

- » Keeping excess personnel out of hazardous areas
- Establish a command post
- Establish a first aid station
- Check for leaking gas lines
- Stay clear of fallen or damaged electrical wires

### **Evacuation Procedures:**

Immediate evacuation of anyone in danger from a fire is the first priority during such an emergency, provided it is safe to do so and you are appropriately equipped and protected. It is a good idea to have two rescuers to participate in all rescue efforts. The second rescuer can assist by fighting the fire with portable extinguishers or standpipe fire hoses if properly trained on how to use them until the victim can be removed. The second rescuer can also remove any obstacles blocking access or egress routes.

### **Evacuation Responsibilities:**

- Assist personnel through the safest escape route
- Assist in traffic control
- If safe to do so, search for stragglers & account for missing personnel
- Prevent facility re-entry by unauthorized personnel
- Inform command post of significant developments

In order to assist in the evacuation of endangered employees, Officers must learn basic victim removal techniques and familiarize themselves with hazards they will face during rescue efforts.

### **Dangers Associated With Victim Evacuation:**

Hot surfaces, falling materials and smoke are hazards that can be encountered during evacuation efforts. Common sense and alert behavior will help to avoid them. If suddenly caught in smoke or heat, stay as low as possible to avoid heat, smoke and inhalation of toxic gasses. Staying below knee level will help avoid these hazards and take advantage of better visibility conditions.

### **Victim Removal - The Clothes Drag:**

If a fire victim is hurt, disoriented or unconscious, Officers will need to move the person to a safe area. If it appears that a severe injury has occurred or if the victim is unconscious, the “clothes drag” method of removal is recommended. This technique helps to limit the injured party’s movement while keeping everyone at a low height. This method can be used to move fairly large and heavy people without much difficulty.

The clothes drag is performed by reaching from behind the victim’s head, with both hands under the victim’s shoulder blades, and grabbing the victim’s shirt. Cradling the victim’s head between the officer’s forearms, the rescuer simply leans back and pulls, dragging the victim head first. The victim should never be pushed laterally or from behind since complications or spinal injury may result. Caution: As the victim’s clothing is being pulled up during the clothes drag, make certain the victim’s chest is not constricted by the shirt. This may cause difficulty in breathing.

# Basic Fire Fighting Methods

Fire protective systems can be grouped into three basic categories:

- Detection systems
- Alarm systems
- Fire suppression systems

Below are the systems and devices Officers should be familiar with:

## Fire Extinguishers - Types and Applications:

Portable fire extinguishers are intended only for use on small incipient (beginning stage) fires or in the interim between discovery of a fire and the functioning of automatic equipment or the arrival of professional firefighters.

Particular attention must be paid to using the right extinguishing agent on the particular class of fire.

## Categories of Fires:

To help simplify the application of firefighting equipment, types of fires have been grouped into four broad classifications:

- **Class A** - Fires in ordinary combustible materials, such as wood, cloth, paper, and rubber; the cooling and quenching effect of the extinguishing agent is of most importance
- **Class B** - Fires in flammable liquids, gases, paints, and greases; the blanketing or smothering effect of the extinguishing agent is essential
- **Class C** - Fires that involve energized electrical equipment where the electrical non-conductivity
- **Class D** - Fires in combustible metals, such as magnesium, titanium, zirconium, sodium, and potassium. Dry powders or granules that exclude oxygen and do not react adversely with the metal are effective extinguishing agents

## Portable Fire Extinguisher Classification:

Extinguishers are identified by the class of fire for which they are intended. Each class of extinguisher has a special shaped symbol for easy identification. Extinguishers are ranked in terms of content capacity, range and approximate discharge time. Basic classification information for each type of fire extinguisher is explained in detail below:

- **Water - Stored Pressure:**

Because the extinguishing agent is water, this type of extinguisher is effective **ONLY** on Class A fires. To use, remove the locking ring pin and squeeze the discharge lever while directing the stream at the base of the flames, working from side to side or around the fire.

Application should begin as close to the fire as possible. The contents will last approximately 1 minute and will produce a stream up to 40 feet.

- **Compressed Carbon Dioxide (CO2):**

Extinguishers that use CO2 are recommended for use on Class B and C fires and **MUST NOT** be used on Class D fires. Apply the discharge first at the near edge of the fire and gradually progress toward the back of the fire. You can also work from side to side and around the fire depending on the size and nature of the fire.

Discharge times for this class of extinguisher are from 8 to 30 seconds. The range of the CO2 Extinguisher is limited and must be used within 6 to 8 feet of the fire.

- **Dry Chemical:**

**Stored Pressure:** These extinguishers are available with varying capacities with discharge times from 8 to 25 seconds and a range of 5 to 20 feet. The extinguishing agent is specially treated material (sodium bicarbonate base) in dry powdery form with components for producing free flow water repellence.

This type of extinguisher is recommended for class B and C fires and **MUST NOT** be used on Class D fires. Dry chemical agents are also most effective when directed at the base of the flame.

- **Multi-Purpose Dry Chemical:**

This class of extinguisher is available in varying capacities, ranges and duration. The main advantage of these extinguishers is that larger units carry an “A” rating. This type of extinguisher is best for the Class B and C fires and suitable for small Class A fires.

Multi-purpose residue should be cleaned up immediately as the agent causes corrosion when discharged on metals.

- **Halon® Extinguishers:**

This agent is recommended for use on Class B and C fires. Halon extinguishers are particularly suited to Class C fires in delicate electronic equipment because they leave no residue.

Discharge time is from 8 to 10 seconds with a range of 4 to 8 feet.

**CAUTION:** When using a Halon agent in unventilated places, you should avoid breathing the gases produced by the thermal decomposition of the agent. To operate effectively, hold the Halon extinguisher at a 45 degree angle while aiming its nozzle at the base of the flames.

- **Dry Powder - Special Compounds:**

Dry powders are intended for use on Class D fires on specific metals, following special techniques and manufacturer’s recommendations for use. The agent and method of application depend upon the type, quantity and form of the metal involved and existing physical conditions. Common dry powders include Met-L-X, Lith-X and Met-L-Kyl.

To apply, approach the fire, fully open the nozzle and let the dry powder fall lightly on the burning metal. Reduce the discharge velocity as the fire subsides. The object is to provide a smothering blanket on the metal surface. The range for dry powders is 6 to 8 feet.

Never apply water on a Class D metal fire as a violent reaction will be experienced.





# General Fire Extinguisher Guidelines

Below are guidelines that will help in the understanding of the placement, maintenance and regulation of fire extinguishers.

- **Location:**

Placement of portable fire extinguishers is probably the most important factor once the appropriate extinguishing agent is identified. Key location issues include:

- » Extinguishers must be located close to hazard areas, but not so close that they would be damaged or isolated by an erupting fire
- » Extinguisher locations should be conspicuous, along normal traffic paths within the facility
- » Extinguishers may be hung on a large column or post or placed on top of a file cabinet
- » Extinguisher locations should be clearly marked with a distinguishing red band or large printed sign
- » Fire extinguishers should never be blocked or hidden by stock, finished material or equipment nor should extinguishers be placed where they may be damaged by vehicles, operations or chemicals
- » Extinguishers should be kept clean and should not be painted in any way that would camouflage them or obscure their labels

- **Inspection:**

Fire extinguishers should be inspected monthly, per National Fire Protection Association (NFPA) guidelines, or at more frequent intervals when circumstances require (such as a discharge). Inspection is the responsibility of the Client unless otherwise specified in the contract.

Inspection objectives include making sure extinguishers are in their designated places, that they have not been moved, actuated or tampered with, and to detect any physical damage, corrosion or other impairments. The value of an inspection lies in the frequency, regularity, and thoroughness with which it is conducted.

- **Maintenance:**

At regular intervals, as specified by NFPA and OSHA regulations or when indicated by an inspection, extinguishers should be thoroughly examined and recharged, repaired or replace, as needed. This is the responsibility of the Client unless otherwise specified in the contract.

Extinguishers should only be removed a few units at a time and replacement extinguishers should be put in their place during their absence so an extinguisher will always be available should a fire occur.

Maintenance requires a thorough examination by a qualified party to determine the condition of the three basic elements of an extinguisher:

- » The mechanical parts - containers and pressure vessels
- » The extinguishing material - amount and condition
- » The expelling means - gas leakage and condition of pump

Note: This service needs to be conducted by a trained technician or service company. Unless contractually agreed upon and properly trained, officers would not provide this service.

- **Record keeping Standards:**

Maintenance and inspection records consist of a durable tag fastened to the extinguisher showing dates of inspection recharge or repair. A duplicate record is to be kept in a designated office file. Other office records list extinguishers by type, location, recharge schedules, history of each unit and other pertinent information. Record keeping is the responsibility of the Client.

## Automatic Sprinkler Systems

An automatic sprinkler system consists of water source, a fire department connection, a main alarm valve, one-way valves (clapper valves), a delivery system of pipes and sprinkler heads.

- **Delivery System:**

The delivery system consists of a vertical pipe called a riser, leading up from a main shutoff alarm valve to horizontal feed lines on which the sprinkler heads are installed.

- **Extinguishing/Sprinkler Head:**

The sprinkler head acts as a heat detector, a nozzle and a spray distributor. The sprinkler head usually has a cap over an opening that is held in place by a heat sensitive mechanism. When the mechanism reaches a preset temperature, the mechanism and the pressure cap fly away, releasing the water.

- **Main Shutoff Alarm Valve:**

This mechanism is usually located where the water for the sprinkler system enters the building. Its simplest form consists of a shut off valve, a one-way clapper valve and an alarm circuit. The shut off valve, usually located below the clapper valve, should be locked in the open position at all times. The alarm is set off when the shutoff valve is closed.

## Types of Sprinkler Systems

- **Wet Pipe System:**

This system maintains pressurized water in all pipes, to all sprinkler heads, at all times. Most automatic sprinklers are wet pipe systems; however, they may only be installed in heated facilities where there is no chance the pipes will freeze. If heat is lost during freezing weather conditions, or if doors or windows are broken near wet pipe systems during these conditions, the client is to be notified immediately.

- **Dry Pipe System:**

This alternative system is used in areas where pipes are exposed to temperatures below freezing. Water is stored in the system only up to the clapper valve. In northern climates this clapper/control valve assembly will be contained in a heated area. The remainder of the system is pressurized with compressed air or nitrogen. When the sprinkler head is activated by heat, the compressed air or nitrogen is released. This removes the pressure holding the clapper valve in place and allows the extinguishing agent to fill the system and escape through open sprinklers.

- **Reaction System:**

This system is similar to dry pipe systems except the clapper valve is controlled by an independent heat-sensing device/system. This device detects heat sooner than sprinkler heads, gives the alarm, trips the clapper/control valve, and then floods the feeder pipes with water earlier than a conventional dry pipe system.

- **Deluge System:**

This system is used to supply large amounts of the extinguishing agent or water to high hazard areas faster than standard sprinkler systems. Like the reaction system, it uses independent heat sensors; however, the sprinkler heads do not have caps/fusible links which restrict the flow of the extinguishing agent or water. The agent flows freely from the all the sprinklers heads that are covered by the system until the system is shut down.

## **Alarm Systems**

Primarily, alarm systems notify the building occupants to evacuate and notify the local fire department of the emergency. A typical fire alarm system consists of manual pull stations, detectors, and flow sensors (on automatic sprinkler systems); an information processor or control panel; employee notification devices including audiovisual and tactile signals; and a system for notifying the local fire department.

## **Smoke, Heat and Fire Detection Devices:**

- **Smoke Detectors:**

These devices detect smoke before flames and the lethal effects of carbon monoxide are present. The three different types of smoke detectors, ionization, photoelectric and ionization/photoelectric, accomplish the same task with different detection mechanisms. Smoke alarms can be operated independently or they can be linked to larger fire detection systems.

- **Heat Detectors:**

These mechanisms are used in areas such as electrical switching rooms where automatic sprinklers are dangerous to life or property. Heat detectors are usually tied into a fire alarm system or control center.

- **Flame Detectors:**

These devices are utilized in high fire hazard areas in conjunction with other fire detection systems. Flame detectors use light-sensitive mechanisms to accomplish the task.

Officers should observe the fire detection and suppression systems carefully as they tour the client facility.

## **Fire Extinguishing Methods:**

- Take away the source of heat
- Take away its fuel (turn off gas or electricity)
- Take away its air (smother it with water or chemical agents)

## Helpful Hints:

- Getting the combustible materials with glowing embers or burning material out of the facility if can be done safely
- Smothering the fire with a rug, coat, earth or similar heavy item, preferably wet
- Putting out the fire with the appropriate extinguishing agent - Match the class of extinguisher to the type of fire

## Special Methods for Specific Types of Fires:

- **Electrical Fires:**

Try to shut off the electricity first. If this is possible, you can use water or a multi-purpose extinguisher. If the power source cannot be severed, **DON'T USE WATER** as electrical shock will occur

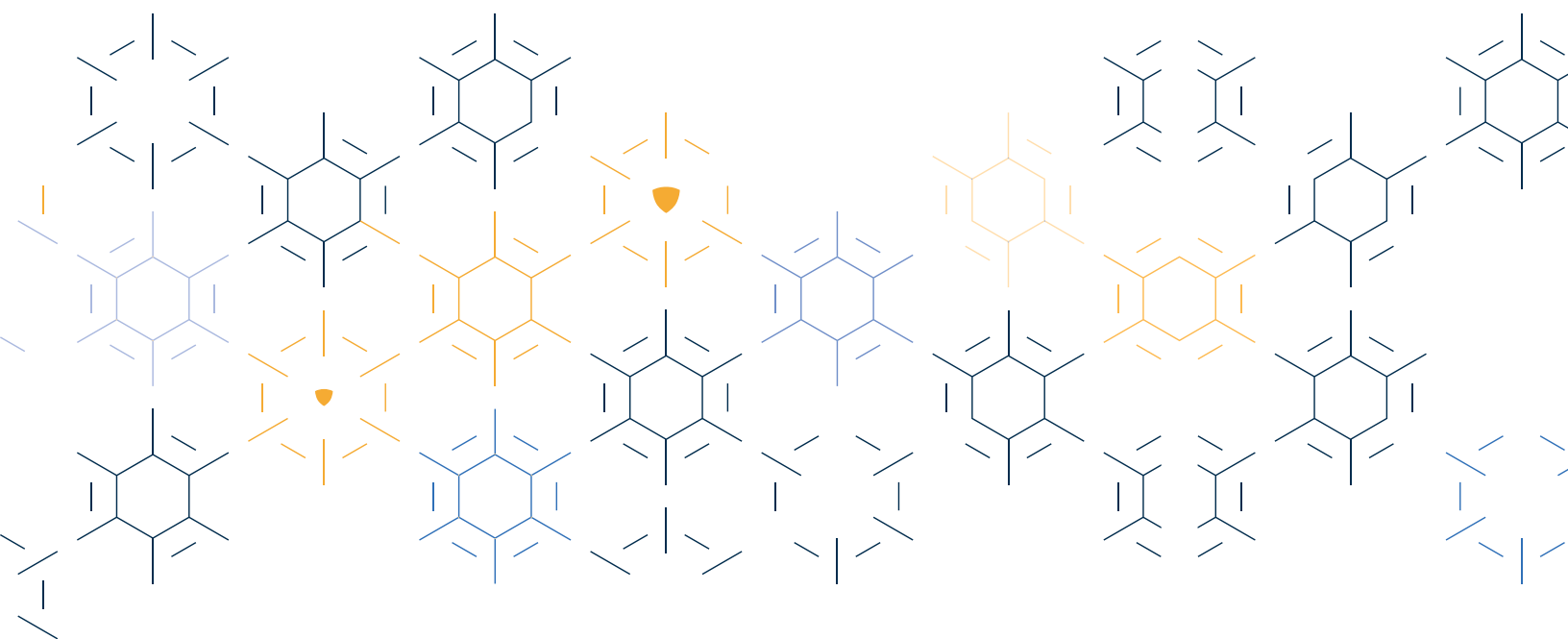
- **Oil and Grease Fires:**

Try to shut off the supply of whatever is burning. You should then smother the flames with earth, rugs or chemical agents. **NEVER USE WATER** on grease or oil fires as it will spread the fire

- **Victim on Fire:**

If a victim is on fire, do not use portable extinguishers or standpipe hose equipment to extinguish the fire. Water pressure, additives or the temperature of the extinguishing agent can cause further injury to the victim. It is more effective to bring the victim to the ground and wrap him/her in a blanket, towel or curtain to smother the flames. If these articles are not available, roll the victim over and over on the floor/ground until the fire is extinguished. Make sure that the victim uses his/her hands to cover the face during this effort.

**NOTE: Prior authorization by the client and proper instruction/training is required before the officer may operate, shut off or restart any client fire protection systems.**



## 13A FIRE SAFETY PROGRAM TRAINING ACKNOWLEDGMENT

### PARAGON

I acknowledge that I have received information and training on the FIRE SAFETY Program when required as part of assigned roles and responsibilities to participate in fire prevention policies and procedures at assigned sites as required per Federal OSHA Regulations 29 CFR Subpart E, H, L, N and Cal OSHA Title 8 Regulations CCR 6151, CCR 6170, CCR6183, CCR6184, CCR 6519, CCR 6773, CCR 7055, and CCR 8397.

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Employee Name (Print)

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Date

---

Employee Signature

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Instructor/Trainer Name

cc: Personnel File



## SECTION 14

# Emergency First Aid

# EMERGENCY FIRST AID

## Introduction

A sudden illness or physical injury can strike anyone at any time. Medical authorities state that victims die each year or suffer disabling effects for the lack of proper care immediately after the accident or the start of the illness.

The OSHA Medical Services and First Aid standard, 29CFR 1910.151, indicates that:

- a. The employer shall ensure the ready availability of medical personnel of advice and consultation on matters of plant health.***
- b. 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 a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.***
- c. 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 with the work area for immediate emergency use.***

The intent is that prompt first aid for injured employees and emergency treatment is available in the critical minutes between occurrence of an injury and the availability of care is provided by either an available trained first aid provider at the worksite, that the emergency services/facilities are available near the worksite (e.g. an infirmary, clinic, or hospital) where transporting can be done safely, or that emergency services (e.g. fire department paramedics or EMS providers) are able to promptly respond within a reasonable time frame to the worksite.

OSHA has interpreted “near proximity” as emergency care being available within 3-4 minutes from the workplace if there is a potential for serious topped breathing, cardiac arrest, uncontrollable bleeding or where serious accidents (e.g. falls, electrocution etc.) could occur, but recognizes that a somewhat longer response time of up to 15 minutes may be reasonable in places where the possibility of such serious work related injuries is more remote.

If relying on the use of emergency providers vs. provision of a first aid trained employee is chosen the services must be reasonably accessible, and employers must take appropriate steps prior to any accident (e.g. making arrangements with the service provider) to ascertain the emergency medical assistance will be promptly available when an injury occurs.

In a major disaster phone lines to emergency medical services may be overloaded or damaged. This Emergency First Aid section offers basic directions for initiating emergency medical service. (For further information, see SOSTEC, Volume III, Chapter 1, or contact your local YMCA/YWCA, Red Cross, or National Safety Council office).

When a person stops breathing death may occur within 4 to 6 minutes. When a person is bleeding badly, unless the bleeding is stopped, about 15 minutes of life may remain. In an emergency, seconds and minutes can make the difference between life and death. Decisive, quick and proper action can save a life.



In an accident and it is determined that the victim should be transported to the nearest medical facility; the medical facility should be notified that the victim is in transit.

## Minor First Aid

Throughout the course of everyday business operations, there are times when an employee may encounter a “minor injury” such as: a small cut/abrasion, dust in the eye, small bump or bruise. The majority of such incidents can simply be treated onsite with simple supplies that can be found in a first aid kit and do not require a visit to the doctor’s office. It is important that the first aid supplies are accessible by all Paragon employees working at each site. Sometimes the client provides such resources and sometimes the supplies must be furnished by Paragon.

First aid supplies are required to be readily available under paragraph § 1910.151(b) of. An example of the minimal contents of a generic first aid kit is described in American National Standard (ANSI) Z308.1-1998 “Minimum Requirements for Workplace First-aid Kits.” The contents of the kit listed in the ANSI standard should be adequate for small worksites. When larger operations or multiple operations are being conducted at the same location, you should determine the need for additional first aid kits at the worksite, additional types of first aid equipment and supplies and additional quantities and types of supplies and equipment in the first aid kits.

Using incident reports, the local office should assess any additional needs of the worksite to ensure that reasonably anticipated supplies are available. You should assess the specific needs of their worksite periodically and augment the first aid kit appropriately.

### Example:

If it is reasonably anticipated that employees will be exposed to blood or other potentially infectious materials while using first aid supplies, employers are required to provide appropriate personal protective equipment (PPE) and training in compliance with the provisions of the Occupational Exposure to Blood borne Pathogens standard, § 1910.1030(d)(3) (56 FR 64175). This standard lists appropriate PPE for this type of exposure, such as gloves, gowns, face shields, masks, and eye protection.

There are several sources that can provide first aid supplies for your workplace:

- Vendors (such as Zee Medical)
- Local drug store

Program Managers and site supervision are responsible for ensuring that the first aid needs have been assessed and that first aid supplies are made readily available to all employees. Supervisors should check the contents at least monthly.

All employees should be trained on the locations of all first aid kits made available to them and the locations should be included in the post orders. No matter how minor the injury may seem to be, it is important that all injuries are reported to an employee’s supervisor.

When an injury may appear to be more severe than something that can be handled as minor first aid, it is important that all employees know who to contact and where they may be able to find emergency medical treatment. **The contact information should be clearly posted at each location by program management or site supervision, identifying names, phone numbers and addresses (See Section 14a).** All injuries must be reported to the District Office as well.

## The Call for Help

- If an injured person is in distress but is breathing, telephone for help at once.
- If the victim is not breathing, help first and phone later, or get someone else to phone.

### What to Say to the Emergency Center:

- Give the phone number from which you are calling.
- Give the company's name and address and special description of how to get to the victim.
- If calling from a cell phone and not a land line, give the GPS coordinates in Latitude (N-S) and Longitude (E-W) for the location
- Describe the victim's condition as best you can - burn - bleeding - broken bones.
- Give your name.

**DO NOT HANG UP!** Let the emergency person end the conversation. They may have additional questions to ask or need to verify what information has been given.

Below are some examples of first aid scenarios and the type of first aid treatment that officers may need to provide:

## Choking

Anything stuck in the throat blocking the air passage can stop breathing and cause unconsciousness and death within 4 to 6 minutes.

Do not interfere with a choking victim who can speak, cough or breathe. However, if choking continues without lessening, seek medical help.

If the victim cannot speak, cough or breathe, immediately have someone call for emergency medical help while you take the following actions:

### For a conscious victim:

- Stand behind and to the side of the victim who can be standing or sitting.
- Support the victim with one hand on the chest.
- The victims head should be lowered.
- Stand behind the victim, who can be standing or sitting, wrap your arms around his or her middle just above the navel, clasp your hands together in a double fist and press in and up in quick thrusts.
- Repeat several times.

If still unsuccessful repeat the above until victim is no longer choking or becomes unconscious.

### For an Unconscious Victim:

- Place the victim on the floor or ground and give rescue breathing.
- If the victim does not start breathing and it appears that your air is not going in to the victim's lungs:

- Roll the victim onto his/her side, facing you, with the victim's chest against your knee and give 4 sharp blows between the shoulder blades. If the victim still does not start breathing;
- Roll the victim onto his or her back and give one or more manual thrust. To give the thrusts, place one of your hands on top of the other with the heel of the bottom hand in the middle of the abdomen, slightly above the navel and below the rib cage.
- Press into the victim's abdomen with a quick upward thrust. Do not press to either side. Repeat 4 times if needed.
- Clear the airway. Hold the victim's mouth open with one hand using your thumb to depress the tongue.
- Make a hook with the pointer finger of your other hand, and in a gentle sweeping motion reach into the victim's throat and feel for a swallowed foreign object which may be blocking the air passage. Repeat the above until successful.

## Breathing

Breathing is the most critical thing we must do to stay alive. A primary cause of death is the lack of air. Be careful approaching an unconscious person. He may be in contact with electrical current. If that is the case, turn off the electricity before you touch the victim. There are hundreds of other possible causes of unconsciousness, but the first thing you must check for is breathing.

- Try to awaken the person: shake the victim's shoulder vigorously. Shout, "Are you all right?"
- If there is no response, check for signs of breathing. Perform CPR (Cardio Pulmonary Resuscitation), but only if qualified. Assist anyone who can perform CPR by obtaining emergency assistance.

## Electrical Shock

Normal electrical current can be deadly - and it is all around us.

- Do not touch a person who has been in contact with electrical current until you are certain that the electricity has been turned off. Shut off the power at the plug, circuit breaker or fuse box.
- If the victim is in contact with a wire, where the power cannot be shut off, use a dry stick to move it away.
- Check for breathing - If the victim's breathing is weak or has stopped, give rescue breathing immediately.
- Call for emergency help and while you wait for help to arrive keep the victim warm.

## Heart Attack

Heart attack is the number one killer of adults over the age of 38. Many heart attack victims die needlessly because they do not get help in time. Warning signs include:

- Severe squeezing pains in the chest.
- Pain that radiates from the chest into the arm, neck or jaw.
- Sweating and weakness, nausea or vomiting.
- Pain that extends across the shoulders to the back.

- If a victim is experiencing any of these sensations take no chances. Call for emergency help at once. Two critical life threatening things happen to the victim of a heart attack:
- Breathing slows down or stops.
- The heart slows down or stops pumping blood.
- If the victim is not breathing, give rescue breathing immediately and have someone call for emergency help.

## Seizure

A seizure is an alarming sight. A person's limbs jerk violently, eyes may roll upward, and breathing may become heavy with dribbling or frothing at the mouth. Breathing may stop in some seizures. The victim may bite his or her tongue so severely that it blocks the airway. Do not attempt to force anything into the victim's mouth. You may injure the victim.

### During a seizure:

There is little you can do to stop the seizure. You must call for help. Let the seizure run its course.

- Help the victim to lie down and keep him/her from falling.
- Loosen any restrictive clothing.

### After the seizure:

- Check to see if the victim is breathing. If not, give rescue breathing at once.
- Check to see if the victim is wearing a medical Alert bracelet, it describes emergency medical requirements.
- Check to see if the victim has any burns around the mouth. This would indicate poison.

The victim of a seizure or convulsion may be conscious but confused and not talkative when the intense movement stops. Stay with the victim. Be certain that breathing continues. When the victim seems able to move, get medical attention.

## Poisoning

Most everywhere people are in contact with poisons. Material Safety Data Sheets should be maintained on all chemicals used. These will have instruction on what actions need to be taken. However, many poisonous products are not listed, such as paint, paint thinner, glues, gas and other petroleum products.

If there is reason to believe a victim has been accidentally poisoned immediate action should be taken.

- Take action: Call a poison information center nearest you.
- Transportation to a medical facility is necessary, be sure to take the suspected item and container with you.
- If the victim is unconscious, make sure patient is breathing.
- If the victim is not breathing, tilt the head back and perform mouth to mouth breathing but only if qualified to do so. Do not give victim anything by mouth. Do not attempt to stimulate person. Call emergency rescue squad immediately.

- If the victim is vomiting, roll him on to the left side so that the victim will not choke on what is brought up.

Be prepared. Determine and verify the Poison Control Center number and refer to the Emergency Action Phone List.

## Drug Overdose

A drug overdose is poisoning. Alcohol is as much a poison as stimulants, tranquilizers, narcotics, hallucinogens or inhalants. Don't take drunkenness lightly. Alcohol in combination with certain other drugs can be deadly.

- Call for emergency help at once.
- Check the victim's breathing and pulse. If breathing has stopped or is very weak, give Rescue breathing.

Caution: Victims being revived of alcohol poisoning can be violent. Be careful. They can harm themselves and others.

While waiting for help:

- Watch breathing.
- Cover the person with a blanket for warmth.
- Do not throw water on the victim's face.
- Do not give liquor or a stimulant.

## Burns

### Minor Burns:

- Burns caused by fire, covering only a small area of the body can be treated with cold running water for 20 to 30 minutes to relieve swelling and pain.
- Do not use grease of any kind. Grease traps heat and continues the burning process.

### Serious Burns:

- Call for help immediately.
- Wrap the victim with a serious burn (caused by fire) in a clean sheet or towel that has been moistened at a warm temperature.
- Do not attempt to clean the burns or remove clothing or other particles attached to the burnt area.
- Keep the victim lying down and reassured.

### Eye burns:

If employees work in locations where there is potential for exposure to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body shall be provided with the work area for immediate emergency use. All employees should be trained on the locations of all eye flushing and showering stations are available to them and the locations should be included in the post orders

- Flush the eyes with large amounts of water, while keeping eyes fully open.
- Cover the eyes with a damp clean towel and get emergency medical care as soon as possible.

### **Chemical Burns:**

- Get the victim under a cool shower if possible.
- Wash with large amounts of cool running water.
- Remove all chemical soaked clothing immediately while in the shower and avoid contact with the soaked clothing.
- Continue water flushing for at least 10 minutes.
- If emergency medical attention is not on site by this time, wrap the victim in a clean sheet, keep the victim calm and reassured.

### **Electrical Burns:**

- These burns are difficult to detect.
- A person who has received a severe electrical shock may be badly burned internally, though the surface skin shows little evidence.
- Get the victim prompt medical attention.
- Unattended electrical burns can lead to serious complications.

## **Bleeding**

The best way to control bleeding is with direct pressure over the site of the wound.

- Use a pad of sterile gauze if one is available.
- A sanitary napkin, a clean handkerchief, or even your bare hand, if necessary, will do.
- Apply firm steady direct pressure from 5 to 15 minutes. Most bleeding will stop within a few minutes.

If bleeding is from a foot, leg or arm, use gravity to help slow the flow of blood. Elevate the limb so that it is higher than the victim's heart.

### **Head Injuries:**

If there is bleeding from an ear, it usually means that there is a skull fracture.

Special care must be taken when trying to stop any scalp bleeding when there is a suspected skull fracture. Bleeding from the scalp can be very heavy even when the injury is not too serious.

- Don't press too hard. Be extremely careful when applying pressure over the wound so that bone chips from a possible fracture will not be pressed into the brain.
- Always suspect a neck injury when there is a serious head injury. Immobilize the head and neck.
- Call for emergency help. Let a professional medical person clean the wound, and stitch it if necessary.
- Do not give alcohol or other drugs. They may mask important symptoms.

## Internal Bleeding:

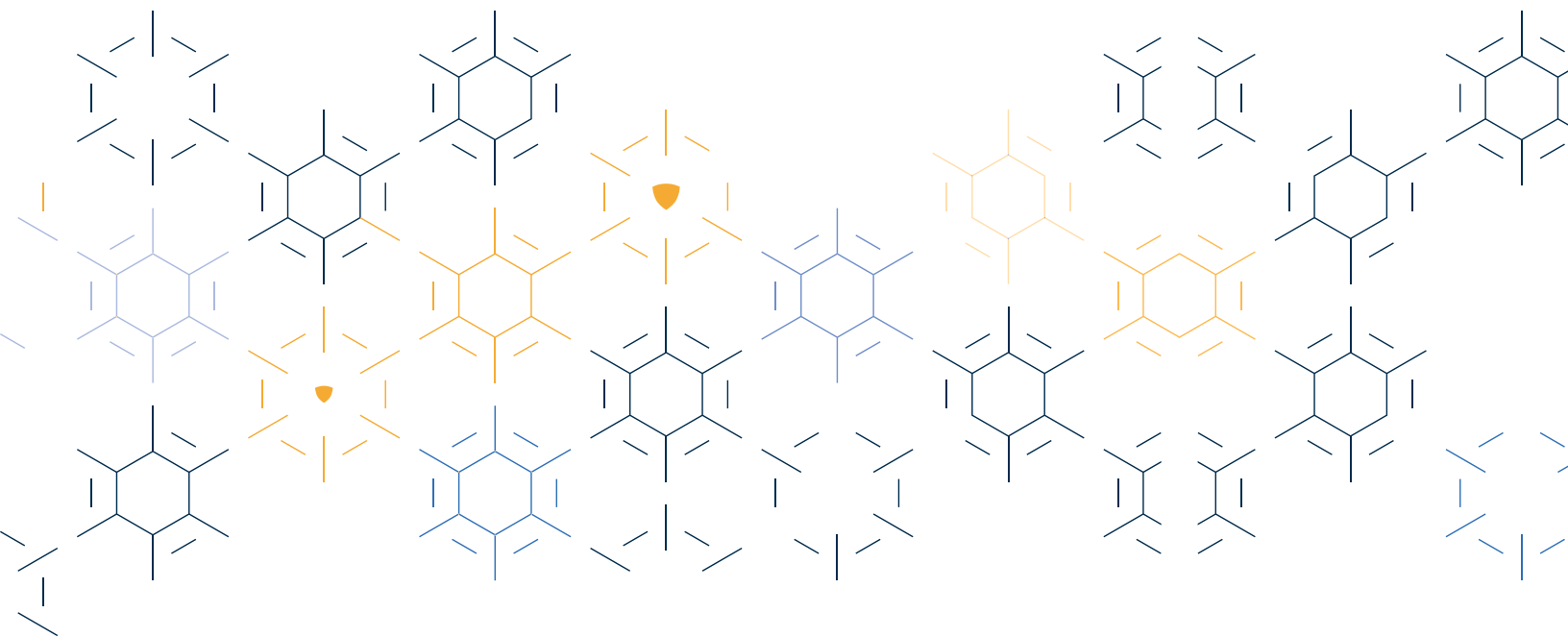
Warning signs: coughing or vomiting of blood or “coffee ground” materials. This symptom requires immediate medical attention.

- Have the victim lie flat and breathe deeply.
- Do not let the victim take any medication or fluid by mouth until seen by a doctor who permits it.
- Obtain emergency medical help immediately.

## Broken Bones

Broken bones usually do not kill. Do not move the victim unless the victim is in immediate danger of further injury. Broken bones usually are a result of a severe blow requiring assistance or other means. Check for breathing - if necessary give rescue breathing - bleeding, apply direct pressure over the site if necessary - shock, keep the victim clam and warm.

- Call for emergency help.
- Do not try to push broken bones into place if it is sticking out of the skin. Do apply a moist dressing to prevent drying.
- Do not try to straighten out a fracture. Let a doctor or trained person do that.
- Do not permit the victim to walk about.
- Splint unstable fractures to prevent painful motion





## 14A EMERGENCY CONTACT INFORMATION

Facility Name:		
Facility Address:		
Site GPS Coordinates:	Latitude (N-S)	Longitude (E-W)
Phone Number Calling From:		

### EMERGENCY PHONE NUMBERS

Fire Department:	
Paramedics/EMTs:	
Ambulance Service:	
Hospital:	
Police/Sheriff Department:	
Poison Control Services:	
On-Site Medical Services:	
Federal Protective Services:	

### EMERGENCY CONTACT NAMES AND PHONE NUMBERS

Highest Ranking On-site Client/Building Manager:		
Name:	Phone No.:	Alt. No.:
Alternate Client Contact:		
Name:	Phone No.:	Alt. No.:
Paragon Site Account Manager/Supervisor:		
Name:	Phone No.:	Alt. No.:
Paragon District Director:		
Name:	Phone No.:	Alt. No.:
Paragon Human Resources Manager :		
Name:	Phone No.:	Alt. No.:

### OTHER EMERGENCY CONTACT NUMBERS

Utility Company/Gas:	
Utility Company/Electric:	
Water Company:	
Alarm Company:	
Paragon Nurses Hotline:	(877) 524-6596



## SECTION 15

# Safety Management Committee

## Safety Management Committee

Safety management of each local office is the direct responsibility of the District Director, aided by a Safety Management Committee (Committee). This Committee is a “Steering Committee”, and should:

- Set goals for the area office based on a realistic evaluation of past losses;
- Measure performance against goals:
- Review all accidents - including, but not limited to workers’ compensation accidents, general liability accidents, automotive liability accidents, and property loss accidents.
- Institute corrective action for injuries, accidents, near misses, and reported hazards.
- Create, periodically review, and update a set of area office written safety regulations;
- Direct and evaluate employee safety training; including new employee training and orientation;
- Adopt and oversee special programs such as the Paragon Safe Driving Program and the Fire Safety Training Program;
- Discuss all new officer Worker Compensation claims, monitor treatment and follow-up of all open claims, and review Return-To-Work (RTW) possibilities for injured employees;
- Review near misses and hazard assessments on client safety and potential problems to ensure client cooperation in providing a safe working environment.
- Review training films, plan educational programs.
- Review reports on Client safety and potential problems with client cooperation in providing a safe working environment. Review all company inspections, evaluations, and suggestions. Ensure compliance with the Hazard Communication Act/Global Harmonization System and review of site Injury Illness Prevention Plan (IIPP) and Heat Illness Prevention Plan (HIPPP) at all Client sites.
- Plan incentive programs to reward employees and managers for excellent safety performance.
- Prepare an annual report on District Office safety for the Area Vice-President & Regional President.
- Conduct regularly scheduled Safety Management Committee meetings.

Every District location (unless districts get approval from the VPHR to combine) in the United States must conduct meetings.

The Committee should meet regularly - at least once each calendar month. Each District location shall allow enough time after the meeting for the Meeting Minutes to be accurately prepared and submitted according to the minutes’ distribution list

The Committee should be composed of the following employees from the following areas:

- District/Operations Manager(s)
- Operations/Account Manager(s)
- Designated Injury Coordinator
- HR Manager/Specialist
- Field Operations Supervisor(s)
- Office Manager ( if any)
- Security Officers

Optimum size of the Committee is five (5) to nine (9) persons. If an office is particularly large, selected Field Operations Supervisors should be appointed by the District Director for a period of one year.

**Note:** *In some states, it is mandatory that Safety Management Committees include non-salaried, nonexempt wage employees. If this regulation is mandatory in your state or even if it isn't, it is recommended that a Joint Employee Management Safety Action Council (JEMSAC) be created. In this case, at least two (2) to three (3) Security Officers should be appointed to the committee for terms of one year. It is recommended that selection of the employee be documented with a letter of appointment signed by the area manager, and delivered by the appointee's supervisor, and that a copy of the letter become a permanent part of the employee's file.*

It is suggested that the chairman of the committee be elected by the committee, not appointed, and that the District Director not be selected chairman. This is to encourage active participation of all management.

As the Safety Management Committee is the primary means for total top-management involvement in employee safety issues. As a Committee member, the District Director Participation shall include:

- Taking the opportunity to assess the safety attitudes of managers and supervisors and to effect improvement where needed.
- Evaluating the safety program training component for new-hires and make certain all receive basic safety training upon employment and site specific training before and upon being assigned to any Client location.

Prior to the monthly meeting the following procedures are to be followed:

- The Safety Management Committee Chairperson shall review the prior month's minutes before each meeting to assure that any unfinished business is addressed and accounted for in the current month's meeting and minutes
- The chairperson shall choose the topic for the current month's discussion, print, and review prior to the meeting date in order to formulate ideas for discussion beforehand. This will also allow time for the chairperson to make any calls to obtain any needed clarification before the meeting.
- Topics for the Safety Management Committee meetings and the meeting minutes form can be found on the Intranet under Risk Management, Safety & Training Section.

The monthly meeting will follow an agenda, and each committee member will be prepared to discuss all items on the agenda and be ready to participate with new ideas and thoughts. The agenda for the Safety Management Committee meeting should be as follows:

- **CALL TO ORDER:** The chairperson calls the meeting to order. Indicate date and time.
- **ROLL CALL:** The Secretary calls the roll and lists both present and absent members. Members who must be absent should notify the Secretary in advance and an alternate member should attend, if at all possible.
- **INTRODUCTION OF VISITORS OR NEW MEMBERS**
- **READ PREVIOUS MINUTES:** Previous minutes should be discussed, corrected, and/or approved.
- **UNFINISHED BUSINESS:** All matters held over should be discussed, and all recommendations not acted on since the last meeting should be listed.
- **NEW BUSINESS:** Review all subcommittee reports, injury reports, and safety inspection reports.

- Inspection reports would include self-inspections by Supervisors, outside safety consultant reports, and regulatory agency inspections. Safety suggestions submitted by employees should also be reviewed at this time.
- **REVIEW NEW AND OPEN INJURIES:** Review all subcommittee reports, injury reports, accident investigations and return to work status.
- **SAFETY EDUCATION:** Review new employee, group or departmental training features.
- **ANNOUNCEMENTS:** The date and time of the next meeting, training session, or other important dates should be announced.
- **ADJOURNMENT**

The maintenance of Safety Management Committee Meeting Minutes by District location is mandatory, as regulated by OSHA. To comply with both Paragon and governmental requirements and regulations, Safety Management Committee Meeting Minutes must be maintained and submitted by each District location.

- The worksheets are intended to be official documentation of the discussions held and actions planned at each meeting.
- Each District location must maintain their own Safety Management Committee file, including copies of all minutes and materials related to safety meetings.
- Records must be kept on-file for the preceding five (5) years, after which time they may be destroyed.
- Minutes must be legibly handwritten or typed on the meeting minutes form.
- If a section does not apply to a particular month, simply note in that section “Not Applicable” or “N/A.” (For example, if there were no injuries reported late for a particular month, write “N/A” in that section.). This indicates the section was not overlooked.

The minutes shall be reviewed for accuracy and completeness prior to distribution. In addition to maintaining a copy of the Safety Management Committee Meeting Minutes in each District location and distributed as follows:

- **Director, Safety & Risk Management:** A copy of the minutes must be sent to the Director’s office no later than the 10th of each month.
- **Committee Members:** Each Committee member shall be provided with a copy of the minutes to be reviewed prior to the next meeting.
- **District Location Employees:** The Committee shall provide all its employees with a brief recap of the safety topic covered. Also, based upon the meeting discussions, the Committee shall share information about how to prevent particular injuries experienced locally.

Minutes of the meetings and the agendas followed should be kept. These will provide the basis for annual reports to the Area Vice President or Regional President.



## SECTION 16

# Office Emergency Plan

# Office Emergency Plan

The majority of our employees work at sites other than our business offices, but this does not mean that safety for management and office workers should be ignored. The following addresses the need of an overall emergency and fire safety plan for the district locations.

## Introduction

The Federal Occupational Safety and Health Administration has permanent standards for fire protection, means of egress, and other fire related topics. Many states as well have similar and/or overlapping fire safety requirements. Regulations are designed to protect employees from injuries caused by fires or related to fire situations.

In a fire or other emergency the fire can be fought or the premises can be evacuated leaving firefighting to the public fire department. It is recommended that all office personnel be informed as to their duties in the event of a fire. If employees have been trained in the proper use and type of fire extinguishers to be used to stop the spread of a fire in the incipient/beginning stages, extinguishers may be used to fight the fire. But in any situation in which life is threatened or the fire begins to spread, efforts to stop the spread of the fire are to be abandoned and the building should be evacuated. There should always be firm procedures in place for responding in case of a fire.

## Responsibilities

It is the responsibility of the various offices to make sure that a proper emergency plan is written, distributed and reviewed with all employees and periodically practiced (that is, by means of fire drills or emergency evacuation drills) to insure that all office personnel are well versed in the emergency procedures.

Any emergency plan should describe, in writing, those procedures necessary during an emergency (e.g. fire, earthquake, flood, bomb threat, tornado, etc.). These minimum elements should be included in the emergency plan:

- Emergency escape procedures and emergency escape route assignments. These should include maps of the offices and buildings, showing alarm locations, emergency escape routes, and assembly areas. (The building landlord should supply these.)
- Procedures to be followed by employees regarding the use or non-use of fire extinguishers and/or other emergency equipment.
- Procedures to account for all employees after evacuation are completed.
- Rescue and medical duty for those employees who are to perform them.
- The preferred means of reporting fires and other emergencies.
- Names, titles and emergency telephone numbers of management, building officials, local fire department, ambulance services, EMTs/medics, police, hospital, etc.

A fire prevention plan should be included as part of the emergency procedures. This plan should describe the precautions necessary to prevent fires and have the following minimum elements:

- Potential fire hazards (including office supplies) and the type of fire protection equipment which



can control a fire arising out of those hazards.

- Names of office personnel given various fire protection assignments, names and telephone numbers of local fire departments, ambulances, EMTs/medics, police, etc., names of building management where the office is located, and names, titles and emergency telephone numbers of Area Managers to call in case a fire.
- Housekeeping procedures and equipment maintenance procedures which will lessen or eliminate fire hazards.
- All employees should be apprised of fire hazards to which they are exposed and the fire prevention plan must be discussed with each employee and be available for review at all times.

### **Training should not be minimized:**

If the office is large (over 5 people) a sufficient number of persons should be designated and trained to assist in evacuation.

All employees should be advised of their responsibilities when the plan is developed, whenever an employee's responsibilities change, and whenever the plan is changed.

The emergency plan and individual responsibility should be discussed with each employee. The written plan must be made available for review.

Each office has the responsibility to develop and implement a written procedures plan. Aid in developing such a plan can be provided by the building manager, the local fire department, the National Safety Council, and from the Chubb Insurance Company, the present carrier for Workers' Compensation Insurance. A good selection of materials for dealing with emergencies of all types is readily available from these places.

Various sections of the security officer's standards and training extension course will provide further materials in dealing with emergency situations.

Finally, information can be provided by the corporate office staff of the company. Some information is in this Manual, under "Fire Safety".

## **Response Procedure in Case of Fire**

- Go to the nearest phone and dial 911
- Note: If the company phone is inoperative, go to the nearest neighbor and dial 911.
- Slowly and clearly state, "Reporting a fire!"
- Continue slowly and clearly and describe the situation by indicating the following:
  - » name of building or client and the address of the fire
  - » what portion of the building fire is in
  - » what floor if in a multi-story building

Example: "I am reporting a fire at 3210 Daphne Ave, on the East side of Daphne Ave., about 200 yards north of El Segundo Blvd, the fire is located on the 2nd floor at the SE corner of the building"

- Identify the material burning
- Identify the location of the fire in the plant or office
- Specify the number of victims, if any
- Give your phone number
- Stay on the phone until told by 911 operator that they have all the information they need
- Send someone out to meet and direct emergency responders to the scene

The first person to find a fire should immediately sound the ALARM, then:

**If the fire is just starting** (in the incipient/beginning stages)

- Alert all other occupants and visitors about the fire
- Ask your nearest fellow worker to notify supervision/management
- Unless the fire is just starting, do not try to fight the fire. If the fire is just starting, take the nearest fire extinguisher, if properly trained on correct type and proper use and there is no risk of injury, and try to put out the fire. If not trained, evacuate the building
- Check to see that all people have safely evacuated the building and are accounted for in the assembly areas
- Do not return to the fire area without permission of the fire department or site supervision/management

**Annual Fire Drill Program**

- Every person in the facility is to participate
- Simulating actual fire conditions as closely as possible (activating alarm system)
- Observe total Evacuation Plan including accounting for all individuals at assembly areas
- Conduct fire extinguishing training by having employees physically discharging portable fire extinguishers and, if possible, fire hoses prepared separately for the drill
- Full documentation and evaluation of total drill with participant signatures shall be kept on file

**In each section of the building**

- Workers must know where the fire exits, alarms, and assembly areas are
- Keep all fire exit aisles and fire doors, including regular entry clear from any kind of debris at all times
- All workers that have received proper training should be able to handle fire hoses and portable fire extinguishers in their areas, and know where this equipment is located
- Maintain all firefighting equipment in good condition
- Keep a minimum of two feet (24") clearance from and to the firefighting equipment and alarms at all times
- All workers should know what to do in the event of an emergency in their areas
- Upon the completion of each drill, submit a fully documented report to the Chairman of the Safety Committee, to be available to all authorized officials



## SECTION 17

# **OSHA Regulation Requirements, Responses, Posters, Recordkeeping, and Reporting**

## Introduction

The Occupational Safety and Health Act (OSHA) went into effect in an effort to reduce the number workplace related employee injuries and illnesses, and to give guidance and regulatory requirements for the provision of a safe workplace. The Act contains provisions for citations, penalties or fines and/or imprisonment for failure to comply with its requirements.

As part of OSHA's criteria, companies are to keep records and report workplace injuries and illnesses. Where injuries or illnesses are found to be the result of unsafe workplace conditions, OSHA can write citations and assess penalties based on the severity of the conditions discovered and require that workplace conditions be corrected to ensure worker safety.

Program Managers, District Directors and sector Presidents are responsible for complying with the requirement to provide a safe workplace, and for the record keeping requirements and reporting provisions as contained in the Act. At this time, it is possible that our Company or our Clients, or both, would be held responsible for an unsafe condition existing at a client's facility where service is being provided, where a condition could endanger the life or health of a Paragon employee. It is incumbent upon all management personnel to ensure that Paragon offices are maintained in a safe and sanitary condition and that all Paragon employees are properly instructed in, and practice, safe work habits. Any unsafe or unsanitary conditions or safety hazards existing at Clients' locations, which could adversely affect the health or well-being of our employees, should be brought immediately to the attention of Client.

The following sections give guidance to what to do if citations, penalties, and inquiries are received from OSHA, poster requirements, what the OSHA recordkeeping and injury illness reporting requirements are, and what employers' responsibilities are under the Act.

## 17A OSHA Regulation Requirements & Responses

### OSHA Requirements

The Occupational Safety and Health Act requires that: "Each employer shall furnish to each of his employees, employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees". This is often referred to as the General Duty Clause and is used when issuing a citation where there is no specific OSHA Standard to any unsafe condition or hazard noted during an OSHA site inspection.

The following elements are necessary to prove a violation of the General Duty Clause or any specific OSHA Standard:

- a. The employer failed to keep the workplace free of a hazard to which employees of that employer were exposed
- b. The hazard was recognized
- c. The hazard was causing or was likely to cause death or serious physical harm
- d. There was a feasible and useful method to correct the hazard

When an OSHA compliance officer requests entry into a workplace, he or she may do so as the result of a complaint, a reported injury or illness in the workplace, a fatality, or merely that reasonable legislative or administrative standards for conducting an inspection exist at that specific location. The Employer/Client can either permit entry or may request/demand that the OSHA Compliance Officer to present a search warrant before entry will be permitted. It is important to note that OSHA's right to a warrant does not depend on demonstrating probable cause to believe that conditions on the premises violate the OSHA regulations. Any location that is visited by a compliance officer will immediately submit a complete report to Regional Office and Corporate Risk Management office.

When a violation is detected, the compliance officer is authorized to issue a written citation describing the specific nature of the alleged violation, the standard that was allegedly violated, and will designate a time for abatement to be completed.

## **Citations and Penalties**

Citations can be made for various reasons. Most frequent however, is the failure to maintain proper documentation of accidents, lack of investigations regarding the cause of the accident/incident, lack of documented training or training content, lack of safe operation procedures, and unsafe work conditions or equipment. Upon receipt, each citation must be prominently posted by the employer at or near the place where the alleged violation occurred. If the client will not permit the posting of a Paragon citation at the site, it is to be posted at the District Office. A copy of the citation is to be provided immediately to the District office and Paragon Risk Management as there normally will be designated time for response or appeal from either the date of issue or receipt. Therefore, it is important that all OSHA documents be documented with the date received, by whom, and addressed immediately upon receipt as there is a 15-working day deadline for a written response to the citations received if wanting to appeal all or part of the citation(s) before it becomes a final order and no appeal may be entered for review by any court or agency after the deadline. An informal conference may be requested within 10 working days of the receipt of a citation where the existence of the alleged violation, classification of the violation, abatement date or proposed penalty may be discussed to possibly come to a resolution to the issues prior to the deadline.

## **OSHA Inquiry Letters**

Open communication with employees, Paragon Management and the Client regarding complaints of unsafe conditions, and timely response to employee complaints to make sure the workplace hazards are addressed will ensure good working relationships. If not addressed in a timely manner, and if employees feel the workplace is not safe they may write a letter of complaint to OSHA. OSHA usually will write a letter of inquiry regarding the alleged unsafe workplace hazard or condition, and designate a timetable, usually 5-14 calendar days from date of receipt, for investigation into the allegations and a receipt of a written response to indicate if the alleged conditions exist and what has been done or is being done to eliminate the hazard if confirmed. Upon receipt the inquiry letter is to be dated and copies immediately submitted to the Regional Office and Paragon Risk Management for guidance on what needs to be done and assistance with the written response within the designated deadline. If not submitted within the designate date, or if OSHA does not think the alleged condition has been fully addressed, OSHA may show up unannounced to the site to conduct an investigation into the alleged unsafe working condition.

## 17B OSHA Poster Requirements

### OSHA Workplace Posters

Employers are required to display a poster prepared by OSHA's Department of Labor (DOL) that informs workers of the protections and obligations afforded them under Occupational Safety and Health Act, and that for assistance and information, including copies of the Act and of specific health standards employees should contact the employer or the nearest office of the DOL. The OSHA poster "Safety and Health Protection on the Job" must be prominently displayed in a conspicuous place in the workplace/establishment where notices to employees are customarily posted.

An establishment is defined as a single physical location where business is conducted or where services or industrial operations are performed. Where distinctly separate activities are performed at a single physical location, each activity shall be treated as a separate physical establishment, and a separate notice or notices shall be posted in each establishment. Where employees are engaged in activities which are physically dispersed the notice or notices shall be posted at the location which employees report each day. Where employees do not usually work at, or report to a single establishment, such notice or notices shall be posted at the location from which the employees operate to carry out their activities.

State OSHAs shall develop and have an approved poster informing employees of their protections and obligations the poster shall constitute compliance with the posting requirements of the Federal OSHA Act. The State posters shall address but not be limited to the following items:

- Responsibilities of the State, employers and employees
- The right of employees or their representatives to request workplace inspections
- The right of employees making such requests to remain anonymous
- The right of employees to participate in the inspections
- Provisions for prompt notice to employers and employees when alleged violations occur
- Protection for employees against discharge or discrimination for the exercise of their rights under Federal and State law
- Sanctions
- The means of obtaining further information on State law and standards and the address of the State agency
- The right to file complaints with OSHA about State program administration
- A list of the issues as define by Federal OSHA which are not covered by State plan
- The address of the OSHA Regional Office
- Such additional employee protection provisions and obligations under State law as may have been included in the approved State plan.

Any employer failing to comply with the provisions of these requirements shall be subject to citation and penalty in in accordance with the provisions of the Federal regulation.



# 17C OSHA Recordkeeping Requirements

## OSHA Injury Illness Logs

One of the principal provisions of the Act pertains to the recording and reporting of occupational injuries and illnesses. Paragon falls under OSHA's 29CFR 1904.2 partial exemption for our SIC Code 7381 and NAICS Code 561612 which indicate that the corporation is exempt/not required to keep consolidated records for the entire organization. However, all local District Offices are required to maintain OSHA 300 logs of employee occupational injuries and illnesses as one of the measurements of the safety programs that are in place.

Since all records must be prepared and maintained at the location at which an injured employee is employed, it will be the responsibility of each Regional President, Area Vice President/Area Director, District Director, Operations Supervisor, HR Managers and any other managerial staff members of all regional, area, field offices to become thoroughly familiar with the requirements of the Act and to set up procedures to ensure compliance with these requirements to maintain the records of recordable occupational injuries and illnesses. Such records consist of:

- A log and summary of occupational injuries and illnesses, OSHA Form 300/300A.  
*Note: A running total is to be penciled in at the bottom of each column on the 300 log and then filled in with ink at the end of the year.*
- An annual listing of occupational injuries and illnesses, with OSHA Form 300 to be used in presenting the summary of the listing.
- Periodic reports from the claims administrator should list all the claims each District Office has reported. This is why it is so important that the area location number is reported correctly.
- Detailed information on every claim listed on the summary.
- The supervisor's accident investigation report contains all of the information required by the OSHA requirements.
- A supplementary informational sheet on each claim. This is satisfied by the Supervisor's Accident Investigation report and completion of OSHA Form 301, a copy of which should be kept with the OSHA 300 form.

*Note: If the state where and injury or illness occurs has an OSHA approved State Plan, be sure to check for any additional record keeping requirements.*

District Offices are required to post an annual summary of occupational injuries and illnesses. The summary consists of a copy of the year's totals from the OSHA Form 300A. The OSHA Form 300 must be used in printing the summary. If no injuries or illnesses occurred in the year, zeros are entered in the total lines and the form posted. The summary for the previous year is to be completed and posted from February 1 to April 30 of every year. Whoever supervises the preparation of the log and summary must certify that the summary is true and completed.

The OSHA 300 Log, the Supervisor's Accident Investigation Report, OSHA Form 301 and the annual summary (OSHA Form 300A) are retained at each District Office for five (5) years following the end year to which they relate, and a copy of the 300 log and summary is to be sent to and kept at the Regional Office.



# 17D OSHA Reporting Requirements

## Required Reporting of Injuries and Illnesses

In the event any Paragon employee experiences any of the following work-related events then OSHA 29CFR1904.39 requires that all employers report the work-related event to Federal OSHA or State OSHA per the following criteria as of January 1, 2015 from the time of learning of when the incident occurred:

- All work-related deaths (report within 8 hrs. for all fatalities within 30 days of the incident)
- All work-related in-patient hospitalizations of one or more employees (report within 24 hrs. if hospitalization occurs within 24 hrs. of the incident)
- All work-related amputations (report within 24 hrs. if amputation occurs within 24 hrs. of the incident)
- All work-related losses of an eye which (report within 24 hrs. if any loss of an eye occurs within 24 hrs. of the incident)

### Definitions:

*Hospitalization: being formally admitted into the hospital or clinic for at least one overnight stay for a work-related injury or illness.*

*In-patient: a patient who has been formally admitted into the hospital (hospitalized) and stays in a hospital while receiving medical care or treatment for a work-related injury or illness.*

*Serious injury or illness that is work-related: injury or illness occurring in a place of employment or in connection with employment which requires inpatient-hospitalization for a period in excess of 24 hours for other than medical observation or in which an employee suffers a loss of any member of the body or suffers any serious degree of permanent disfigurement.*

If an employee dies on site due to what are apparent non-work-related natural causes, during scheduled working hours, no call is required to be made to the governmental authorities.

*In the case of an injury or fatality of an employee working at a client facility or Paragon office, this notification should be made to the Program Manager and Human Resources Manager which will notify Paragon Risk Management.*

As soon as soon as Paragon becomes aware of any of the above incidents, or any fatality due to apparent natural causes, the site security supervisor, business manager, program manager or department manager is to immediately (anytime day or night, including weekends and holidays) notify the Paragon Human Resources Manager or designated alternate. The HR Manager shall then notify the appropriate VP of HR who shall then notify the sector President and Paragon Risk Management.

The Program Manager, HR Manager or designated alternate will immediately gather the following information:

- Establishment name, location and address where incident occurred
- Supervisor's name and phone number
- Time work-related incident occurred
- Type of reportable work-related event (i.e. fatality, in-patient hospitalization, amputation, or loss of eye)
- Number of employees who suffered a work-related fatality, in-patient hospitalization, amputation, or loss of an eye

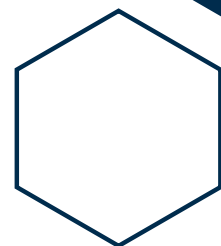
- Name(s) of the employee(s) who suffered a work-related fatality, in-patient hospitalization, amputation, or loss of an eye, including title(s) and social security number(s), birth date(s)/age(s), and normal working hours of the employee(s)
- Names of next of kin and their home address(s) and phone number(s)
- Name of contact person and his/her phone number
- A brief description of the work-related incident (where it occurred and what occurred)
- Where employee(s) was (were) taken, medical facility name(s) and address(s)

As soon as all information is gathered the Director, Safety & Risk Management, **will make the notification to the proper governmental authorities within the 8-hour notification requirement for any fatality, or within 24 hours of any workrelated in-patient hospitalization, amputation, or loss of an eye.** Immediately after which an informational call should be made to the Sector President.

Note: The noted above timetables for reporting are required for all states covered by Federal OSHA. All of the states covered by State OSHAs have adopted the exact the same reporting timetables as Federal OSHA's fatality, hospitalization, amputation or eye loss notification regulation 29 CFR 1904.39 except for the following states which have established different reporting time requirements as noted: Alaska, California, Hawaii, Kentucky, Maryland, Oregon, Utah, Virginia, and Washington.

Alaska and Hawaii indicate the need to report injuries and illnesses if it occurs in the workplace, all the other states have designated verbiage like reporting fatalities, hospitalizations, amputations or eye loss occurring in the workplace that are work related or job/work related need to be reported. Only California requires all employee fatalities and hospitalizations that occur in a place of employment or in connection with any employment need to be reported. CA is the only state regulation that requires all state, county, or local fire or police agencies to notify OSHA immediately if called to an accident covered by the regulation. In addition, where the above noted State OSHAs vary from the Federal OSHA is in the time requirements for reporting as indicated below:

- Alaska: All fatalities and inpatient hospitalizations, amputations or eye loss need to be reported within 8 hours
- California: All fatalities and serious injuries or illnesses requiring hospitalization need to be reported within 8 hours or not longer than 24 hours after the incident
- Hawaii: All fatalities are to be reported within 8 hours, all hospitalizations, amputations or eye loss within 24 hours
- Kentucky: All fatalities and hospitalizations within 8 hours, amputations and eye loss within 72 hours
- Maryland: All fatalities within 8 hours, all hospitalizations, amputations with bone or cartilage loss or eye loss within 24 hours
- Oregon: All Fatalities and hospitalizations of three or more employees within 8 hours, amputations, loss of an eye and hospitalization of fewer than three workers within 24 hours
- Utah: All fatalities and any disabling, serious or significant injury within 8 hours
- Virginia: All fatalities, inpatient hospitalizations, amputations or loss of an eye within 8 hours
- Washington: All fatalities and inpatient hospitalizations within 8 hours, amputations or eye loss within 24 hours



## 17E OSHA Additional Requirements

### Additional OSHA Requirements

Because a great majority of our clients are industrial plants, employees may be exposed to dangers of hazardous or toxic chemicals or materials. The Federal regulations pertaining to our responsibilities and those of our clients are often referred to as the “Right To Know” laws. These laws are definite and must be followed by most industries.

In addition to Federal regulations, most states require an emergency plans be in place in all establishments. The plan must be communicated to employees and contain clear directions as to what should be done in case of various emergencies (earthquake, fire, flood, bomb threat, etc.). Such emergency plans should be communicated to officers that are assigned at each facility. Field supervisors should make sure that at all clients comply with regulations regarding evacuation routes, clear marking of exits and emergency evacuation procedures.

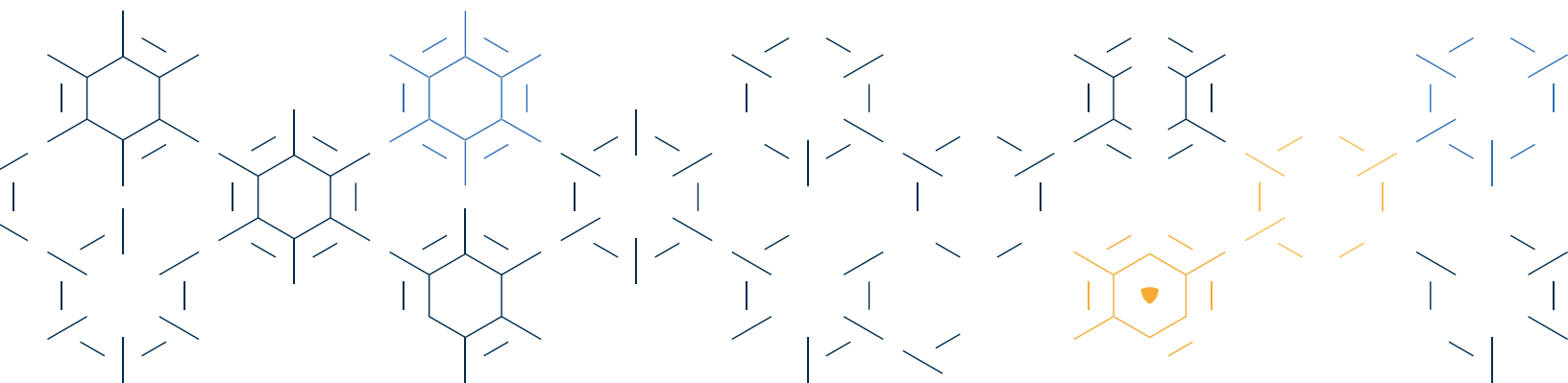
In some states, Federal OSHA regulations are supplemented by State regulations. To be approved, State OSHA plans must be at least as stringent as the Federal OSHA regulations. In some cases, the State regulations copy the Federal OSHA regulations but sometimes the State’s OSHA regulations are more stringent than the Federal Department. A call to the Risk Management Department or to the local State and Federal OSHA offices may be necessary to make sure the office is in compliance with pertinent safety regulations.

This information is not intended to be a complete summary of all OSHA regulations and standards, but rather to advise Managers of the existence of this Act. The Managers have the responsibility to become familiar with it and take appropriate action to comply with the requirements.

A list of the State Statistical Agencies, and US Department of Labor Regional offices, and OSHA Field locations, can be obtained on line at [www.osha.gov/dcsp/osp/](http://www.osha.gov/dcsp/osp/). These offices can be contacted to obtain copies of posters and other OSHA forms. Record keeping requirements under the OSHA Act of 1970 and the booklet “What Every Employer Needs to Know About OSHA Recordkeeping”.

If additional information is received at the corporate office, it will be distributed to all locations.

In summary, the following of governmental regulations is the responsibility of managerial personnel.





## SECTION 18

# Basic Electrical Safety

# Basic Electrical Safety

## Introduction

While the majority of work at Paragon does not involve the installation, operation or maintenance of electrical equipment (wires, transformers, etc.) it is important to understand what comprises electricity, knowledge of its hazards, and precautions to take. This section covers electricity in basic form, additional information can be obtained through various resources such as: the client, and/or outside qualified electrical contractors.

## Theory of Electricity - What is Electricity?

Though you cannot see electricity, you are aware of it every day. You see it used in countless ways. You cannot taste or smell electricity, but you can feel it.

Basically, there are two kinds of electricity - static (stationary) and dynamic (moving).

Dynamic electricity is characterized by the flow of electrons through a conductor. To understand this phenomenon, you must know something about Chemical Elements and Atoms.

**Elements** are the most basic of materials. Every known substance - solid, liquid, or gas - is composed of elements.

An **Atom** is the smallest particle of an element that retains all the properties of that element. Each element has its own kind of atom, i.e., all hydrogen atoms are alike, and they are all different from the atoms of other elements. However, all atoms have certain things in common. They all have an inner part, the **nucleus**, composed of tiny particles called **protons** and **neutrons**. An atom also has an outer part. It consists of other tiny particles, called **electrons**, which orbit around the nucleus. Neutrons have no electrical charge, but protons are positively charged. Electrons have a negative charge. The atoms of each element have a definite number of electrons, and they have the same number of protons. An aluminum atom, for example, has thirteen of each. The opposite charges - negative electrons and positive protons - attract each other and tend to hold electrons in orbit. As long as this arrangement is not changed, an atom is electrically balanced.

However, the electrons of some atoms are easily moved out of their orbits. This ability of electrons to move or flow is the basis of current electricity.

When electrons leave their orbits, they are referred to as **free electrons**. If the movement of free electrons is channeled in a given direction, a flow of electrons occurs. As previously stated, the flow of electrons through a conductor characterizes dynamic electricity.

## Electrical Materials

A material that contains many free electrons and is capable of carrying an electric current is called a **conductor**. Metals and (generally) water are conductors. Gold, silver, aluminum and copper are all good conductors.

Materials that contain relatively few free electrons are called **insulators**. Non-metallic materials such as wood, rubber, glass and mica are insulators.

Materials that are **fair conductors** include the human body, earth, and concrete.

## Generating Electricity

There are several ways to produce electricity. Friction, pressure, heat, light, chemical action, and magnetism are among the more practical methods used to make electrons move along a conductor.

## Voltage, Current and Resistance

**Voltage:** A force or pressure must be present before water will flow through a pipeline. Similarly, electrons flow through a conductor because a force called electromotive force (EMF) is exerted.

**Current:** For electrons to move in a particular direction, it is necessary for a potential difference to exist between two points of the EMF source. The continuous movement of electrons past a given point is known as current. It is measured in amperes.

**Resistance:** The movement of electrons along a conductor meets with some opposition. This opposition is known as resistance. Resistance can be useful in electrical work. Resistance makes it possible to generate heat, control current flow, and supply the correct voltage to a device.

In general, resistance in a conductor depends on four factors:

- the material from which it is made
- the length
- the cross-sectional area
- the temperature of the material

**Complete Circuit:** A complete circuit is necessary for the controlled flow or movement of electrons along a conductor. A complete circuit is made up of:

- a source of electricity (e.g., battery)
- a conductor
- a consuming device (load)

The orientation of the positive (+) and negative (-) terminals of the battery remains constant. Since this voltage polarity does not change, the electrons flow in one direction. The negatively charged electrons flow away from the (-) terminal of the voltage source and toward the (+) terminal of the voltage source. By convention, the direction of current flow is the direction in which positive electricity would move to cause the same effects as are produced by the actual motion of electricity. Therefore, the direction of current, as it is usually considered, is in the opposite direction to the motion of the electrons.

**Open Circuit:** An open circuit is one, which does not have a complete path for electrons to follow. Therefore, there is no current flow. Such an incomplete path is usually brought about by a loose connection or the opening of a switch.



**Short Circuit:** A short circuit is one, which has a path of low resistance to electron flow. It is usually created when a low resistance wire is placed across a consuming device. A greater number of electrons will flow through the path of least resistance rather than through the consuming device. A short usually generates an excess current flow, which results in overheating, possibly causing a fire or other damage.

**Comparison of Alternating Current and Direct Current:** Direct current flows continuously in one direction through a circuit because the polarity of the voltage source never changes. Batteries are a source of DC current. Alternating current changes rapidly in both direction and value. In an AC circuit, current flows from the positive terminal to the negative terminal, just as in a DC circuit. But the polarity of the AC terminals reverses at regular intervals, causing the direction of current flow to also reverse. AC current is what is found in houses in the US.

## Transformers

Transformers perform two functions in the transmission of AC. Transformers step up and step down the voltage, and they isolate the generating station from the load. This is how power companies can maintain low current levels in the transmission lines, and hold power losses to a minimum.

## Hazards of Electricity

The primary hazards associated with electricity and its use is:

- **Shock:** Electric shock occurs when the human body becomes part of a path through which electrons can flow. The resulting effect on the body can be either direct or indirect.
  - » **Direct:** Injury or death can occur whenever electric current flows through the human body. Currents of less than 30 mA can result in death.
  - » **Indirect:** Although the electric current through the human body may be well below the values required to cause noticeable injury, human reaction can result in falls from ladders or scaffolds, or movement into operating machinery. Such reaction can result in serious injury or death.
- **Burns:** Burns can result when a person touches electrical wiring or equipment that is improperly used or maintained. Typically, such burn injuries occur on the hands.
- **Arc-Blast:** Arc-blasts occur from high-amperage currents arcing through air. This abnormal current flow (arc-blast) is initiated by contact between two energized points. This contact can be caused by persons who have an accident while working on energized components, or by equipment failure due to fatigue or abuse. Temperatures as high as 35,000 degrees F have been recorded in arc-blast research. The three primary hazards associated with an arc-blast are:
  - » **Thermal Radiation:** In most cases, the radiated thermal energy is only part of the total energy available from the arc. Numerous factors, including skin color, area of exposed skin, and the type of clothing have an effect on the degree of injury. Proper clothing, work distances and overcurrent protection can improve the chances of curable burns.
  - » **Pressure Wave:** A high-energy arcing fault can produce a considerable pressure wave. Research has shown that a person 2 feet away from a 25 kA arc would experience a force of approximately 480 pounds on the front of their body. In addition, such a pressure wave can cause serious ear damage and memory loss due to mild concussions. In some instances, the pressure wave may propel the victim away from the arc-blast, reducing the



exposure to the thermal energy. However, such rapid movement could also cause serious physical injury.

» **Projectiles:** The pressure wave can propel relatively large objects over a considerable distance. In some cases, the pressure wave has sufficient force to snap the heads of 3/8 inch steel bolts and knock over ordinary construction walls.

- **Explosions:** Explosions occur when electricity provides a source of ignition for an explosive mixture in the atmosphere. Ignition can be due to overheated conductors or equipment, or normal arcing (sparking) at switch contacts. OSHA standards, the National Electrical Code and related safety standards have precise requirements for electrical systems and equipment when applied in such areas.
- **Fires:** Electricity is one of the most common causes of fire both in the home and workplace. Defective or misused electrical equipment is a major cause, with high resistance connections being one of the primary sources of ignition. High resistance connections occur where wires are improperly spliced or connected to other components such as receptacle outlets and switches. This was the primary cause of fires associated with the use of aluminum wire in buildings during the 1960s and 1970s.

## Effects of Electricity on the Human Body

The effects of electric shock on the human body depend on several factors. The major factors are:

- Current and Voltage
- Resistance
- Path through body
- Duration of shock

The muscular structure of the body is also a factor in that people having less musculature and more fat typically show similar effects at lesser current values.

### Current and Voltage:

With increasing alternating current, the sensations of tingling give way to contractions of the muscles. The muscular contractions and accompanying sensations of heat increase as the current is increased. Sensations of pain develop, and voluntary control of the muscles that lie in the current's pathway becomes increasingly difficult. As current approaches 15 mA, the victim cannot let go of the conductive surface being grasped. At this point, the individual is said to "freeze" to the circuit. This is frequently referred to as the "let-go" threshold.

As current approaches 100 mA, ventricular fibrillation of the heart occurs. Ventricular fibrillation is defined as "very rapid uncoordinated contractions of the ventricles of the heart resulting in loss of synchronization between heartbeat and pulse beat." Once ventricular fibrillation occurs, it will continue and death will ensue within a few minutes. Use of a special device called a defibrillator is required to save the victim.

Heavy current flow can result in severe burns and heart paralysis. If shock is of short duration, the heart stops during current passage and usually re-starts normally on current interruption, improving the victim's chances for survival.

## **Resistance:**

Studies have shown that the electrical resistance of the human body varies with the amount of moisture on the skin, the pressure applied to the contact point, and the contact area.

The outer layer of skin, the epidermis, has very high resistance when dry. Wet conditions, a cut or other break in the skin will drastically reduce resistance.

Shock severity increases with an increase in pressure of contact, and also the larger the contact area, the lower the resistance.

Whatever protection is offered by skin resistance, decreases rapidly with the increase in voltage. Higher voltages have the capability of “breaking down” the outer layers of the skin, thereby reducing the resistance.

## **Path through Body:**

The path the current takes through the body affects the degree of injury. A small current that passes from one extremity through the heart to the other extremity is capable of causing severe injury or electrocution. There have been many cases where an arm or leg was almost burned off when the extremity came in contact with electrical current and the current only flowed through a portion of the limb before it went out into the other conductor without going through the trunk of the body. Had the current gone through the trunk of the body, the person would almost surely have been electrocuted.

A large number of serious electrical accidents in industry involve current flow from hands to feet. Since such a path involves both the heart and the lungs, results can be fatal.

## **Duration of Shock:**

The duration of the shock has a great bearing on the final outcome. If the shock is of short duration, it may only be a painful experience for the person.

If the level of current flow reaches the approximate ventricular fibrillation threshold of 100 mA a shock duration of a few seconds could be fatal. This is not much current when you consider that a small light duty portable electric drill draws about 30 times as much.

At relatively high currents, death is inevitable if the shock is of appreciable duration; however, if the shock is of short duration, and if the heart has not been damaged, interruption of the current may be followed by a spontaneous resumption of its normal rhythmic contractions.

## **Summary of Effects**

The lethal effects of electric current can be summed up as follows:

Current flow greater than the “let-go” threshold of an individual may cause a person to collapse; become unconscious; and can result in death. The current flow would most often have to continue for longer than five seconds. Although it may not be possible to determine the exact cause of death with certainty, asphyxiation or heart failure are the prime suspects.

Current flow through the chest, neck, head or major nerve centers controlling respiration may result in a failure of the respiratory system. This is usually caused by a disruption of the nerve impulses between the respiratory control center and the respiratory muscles. Such a condition is dangerous since it is possible for the respiratory failure to continue even after the current flow has stopped.

The most dangerous condition can occur when fairly small amounts of current flow through the heart area. Such current flow can cause ventricular fibrillation. This asynchronous movement of the heart causes the hearts' usual rhythmic pumping action to cease. Death results within minutes.

When relatively large currents flow through the heart area, heart action may be stopped entirely. If the shock duration is short and no physical damage to the heart has occurred, the heart may begin rhythmic pumping automatically when the current ceases.

Extensive tissue damage, including internal organ damage due to high temperatures, occurs when very large currents flow through major portions of the body.

There are recorded cases of delayed death after a person has been revived following an electrical shock. This may occur within minutes, hours or even days after the event has occurred. Several assumptions for such delayed effects are:

- internal or unseen hemorrhaging
- emotional or psychological effects of the shock
- aggravation of a pre-existing condition

In many accidents, there is a combination of the above effects, or additional effects may develop after the initial accident, thus making an accurate diagnosis quite difficult.

## Electrical Protective Devices

As a power source, electricity can create conditions almost certain to result in bodily harm, property damage, or both. It is important for workers to understand the hazards involved when they are working around electrical power tools, maintaining electrical equipment, or installing equipment for electrical operation.

The electrical protective devices discussed here include fuses, circuit breakers, and ground-fault circuit interrupters (GFCIs). These devices are critically important to electrical safety. Overcurrent devices should be installed where required. They should be of the size and type to interrupt current flow when it exceeds the capacity of the conductor. Proper selection takes into account not only the capacity of the conductor, but also the rating of the power supply and potential short circuits.

## Types of Overcurrent

There are two types of overcurrent:

- **Overload:** When you ask a 10 hp motor to do the work of a 12 hp motor, an overload condition exists. The overcurrent may be 150 percent of normal current.
- **Fault:** When insulation fails in a circuit, fault current can result that may be from 5 times to 50 times that of normal current.

When a circuit is overloaded, the plasticizers in the insulation are vaporized over a long period of time, and the insulation becomes brittle. The brittle insulation has slightly better electrical insulating properties. However, movement of the conductors due to magnetic or other forces can crack the insulation, and a fault can result. Conductors should be protected from overload and the eventual damage that results.

Faults occur in two ways. Most of the time a fault will occur between a conductor and an enclosure. This is called a ground fault. Infrequently, a fault will occur between two conductors. This is called a short circuit.

Notice that there must be a wire between the grounded conductor and the enclosure to allow the fault current to return to its source. This wire is called the main bonding jumper. If there is no wire, then the electrical system is isolated and requires extra safety features.

The basic idea of an overcurrent protective device is to make a weak link in the circuit. In the case of a fuse, the fuse is destroyed before another part of the system is destroyed. In the case of a circuit breaker, a set of contacts opens the circuit. Unlike a fuse, a circuit breaker can be re-used by re-closing the contacts. Fuses and circuit breakers are designed to protect equipment and facilities, and in so doing, they also provide considerable protection against shock in most situations. However, the only electrical protective device whose sole purpose is to protect people is the ground-fault circuit-interrupter. These various protective devices are further discussed below.

## **Fuses**

A fuse is an electrical device that opens a circuit when the current flowing through it exceeds the rating of the fuse. The “heart” of a fuse is a special metal strip (or wire) designed to melt and blow out when its rated amperage is exceeded.

If the current flowing in the circuit exceeds the rating of the fuse, the metal strip will melt and open the circuit so that no current can flow. A fuse cannot be re-used and must be replaced after eliminating the cause of the overcurrent.

Fuses are designed to protect equipment and conductors from excessive current. It is important to always replace fuses with the proper type and current rating. Too low a rating will result in unnecessary blowouts, while too high a rating may allow dangerously high currents to pass. The symbol for a fuse is shown in the accompanying figure.

## **Circuit Breaker**

Circuit breakers provide protection for equipment and conductors from excessive current without the inconvenience of changing fuses. Circuit breakers trip or open the circuit when the current flow is excessive.

There are two primary types of circuit breakers based on the current sensing mechanism. In the magnetic circuit breaker, the current is sensed by a coil that forms an electromagnet. When the current is excessive, the electromagnet actuates a small armature that pulls the trip mechanism - thus opening the circuit breaker. In the thermal circuit breaker, the current heats a bi-metallic strip, which when heated sufficiently bends enough to allow the trip mechanism to operate.

## Ground-Fault Circuit-Interrupter

A Ground-Fault-Circuit-Interrupter is not an overcurrent device. A GFCI is used to open a circuit if the current flowing to the load does not return by the prescribed route. In a simple 120 volt circuit we usually think of the current flowing through the black (ungrounded) wire to the load and returning to the source through the white (grounded) wire. If it does not return through the grounded wire, then it must have gone somewhere else, usually to ground. The GFCI is designed to limit electric shock to a current and time duration value below that which can produce serious injury.

In most cases, insulation and grounding are used to prevent injury from electrical wiring systems or equipment. However, there are instances when these recognized methods do not provide the degree of protection required. To help appreciate this, let's consider a few examples of where ground fault circuit interrupters would provide additional protection.

Many portable hand tools, such as electric drills, are now manufactured with non-metallic cases. If approved, we refer to such tools as double insulated. Although this design method assists in reducing the risk from grounding deficiencies, a shock hazard can still exist. In many cases, persons should not use such electrical equipment where there is considerable moisture or wetness. Although the person is insulated from the electrical wiring and components, there is still the possibility that water can enter the tool housing. Ordinary water is a conductor of electricity. Therefore, if the water contacts energized parts a path will be provided from inside the housing to the outside, bypassing the double insulation. When a person holding a hand tool under these conditions touches another conductive surface in their work environment, an electric shock will result.

Double-insulated equipment or equipment with non-metallic housings, that does not require grounding under the National Electrical Code, is frequently used around sinks or in situations where the equipment could be dropped into water. Frequently, the initial human response is to grab for the equipment. If a person's hand is placed in the water and another portion of their body is in contact with a conductive surface, a serious or deadly electric shock can occur.

## Grounding

Grounding must be taken into account wherever electrical current flows. It can never be stressed too strongly that proper grounding and bonding must be correctly applied if the system, the equipment, and the people that come in contact with them are to be protected.

Effective grounding means that the path to ground:

- is permanent and continuous
- has ample current-carrying capacity to conduct safely any currents liable to be imposed on it
- has impedance sufficiently low to limit the potential above ground and to facilitate the operation of the overcurrent devices in the circuit

Effective bonding means that the electrical continuity of the grounding circuit is assured by proper connections between service raceways, service cable armor, all service equipment enclosures containing service entrance conductors, and any conduit or armor that forms part of the grounding conductor to the service raceway.

The requirement for effective grounding is one of the most frequently cited violations of OSHA's electrical standards. Effective grounding has no function unless and until there is electrical leakage from a current carrying conductor to its enclosure. When such a ground fault occurs, the equipment grounding conductor goes into action to provide the following:

- It prevents voltages between the electrical enclosure and other enclosures or surroundings
- It provides a path for large amounts of fault or overload current to flow back to the service entrance, thus blowing the fuse or tripping the circuit breaker

If the equipment-grounding conductors are properly installed, this current will be perhaps 10 times or greater than normal current, so the circuit breaker will trip out immediately.

### **But what happens if the grounding does not do the job?**

If the ground-fault path is not properly installed, it may have such high impedance that it does not allow a sufficiently large amount of current to flow. Or, if the grounding conductor continuity has been lost (as when the "U"-shaped grounding prong has been broken off the plug), no fault current will flow. In these cases, the circuit breaker will not trip out, the case of the tool will be energized, and persons touching the tool may be shocked.

So the only way to ensure that the equipment grounding conductor does its job is to be certain that the grounding wire, the grounding prong, the grounding receptacle, and the conduit system are intact and have electrical continuity from each electrical tool back to the service entrance.

As discussed, effective grounding along with overcurrent devices (fuses and circuit breakers) are used to protect equipment and facilities, and in so doing, these devices may also provide considerable protection against shock in most situations. However, the only protective device whose sole purpose is to protect people is the ground-fault circuit-interrupter.

## **Glossary**

**Alternating Current (AC):** The type of electric current which reverses at regularly recurring intervals of time and which has alternately positive and negative values.

**Ampere:** The unit of measurement for the rate of flow of electricity.

**Atom:** The smallest particle into which an element can be divided chemically.

**Capacitance:** The ability to accumulate and give up charge. When the voltage across an electric circuit changes the circuit opposes this change due to capacitance. Capacitance affects DC circuits only when they are turned on and off. In AC circuits, however, the voltage is continuously changing, so that the effect of capacitance is continuous.

**Closed Circuit:** A complete path allowing current to flow.

**Conductor:** A material that gives up free electrons and offers only slight opposition to current flow. Metals are good conductors. Copper and aluminum are very good conductors.

**Current:** The rate of flow of electricity in a circuit, measured in amperes. The symbol for current is the letter I.

**Direct Current (DC):** The type of electric current in which the electrons move continuously in one direction through the conductor.

**Direction of Current Flow:** Electrons flow from a negatively charged point to a positively charged point. When one point in an electrical circuit is marked (-) and the other is marked (+), by convention, the current in the circuit flows from the (+) to the (-).

**Electromagnetism:** The magnetic effect created when an electric current flows in a conductor. This magnetic effect surrounds the conductor only while current is flowing.

**Electromotive Force (EMF):** The electrical force caused by a difference in potential between two points. EMF is measured in volts.

**Electron:** A negatively charged particle with a very small mass. It orbits around the nucleus of an atom.

**Free Electrons:** Electrons in the outer orbits of an atom that can easily be forced out of their orbits.  
**High Voltage:** A term that normally implies a voltage higher than 600 volts.

**Impedance:** The total opposition offered to the flow of an alternating current. It may consist of any combination of resistance, inductive reactance, and capacitive reactance. Impedance is measured in ohms.

**Inductance:** The property of an electric circuit by virtue of which a varying current induces an electromotive force in that circuit or a neighboring circuit. When the current in an electric circuit changes the circuit may oppose the change due to inductance.

**Induction:** The act or process of producing voltage by the relative motion of a conductor across a magnetic field.

**Insulator:** A material that does not give up free electrons easily and offers opposition to current flow. Some of the best insulators are polystyrene, mica, glass, and wood.

**Neutron:** The particle in the nucleus which has no electrical charge.

**Open Circuit:** A break in the circuit which stops current flow. In a series circuit, it means the complete circuit is dead.

**Ohm:** The basic unit of resistance measure. One ohm is equal to the resistance that allows 1 ampere of current to flow when an EMF of 1 volt is applied. The symbol for ohm is the Greek letter omega ( $\Omega$ )





## SECTION 19

# Control of Hazardous Energy (Lockout/ Tagout)

## Introduction

While the majority of the functions Paragon employees are responsible for do not entail the use of energized equipment, there may be times where Officers could have exposure to equipment that may be required to be controlled (e.g., foot patrols on construction sites, remodels in the office, etc.). Therefore, it is important for management and supervision to recognize the potential need and their responsibilities for lock out/tag out programs at their facilities. As equipment varies from location to location, a plan must be developed where the rule applies to Paragon employees and specific steps should be taken to prevent injuries. The Post Orders need to be updated to include preventative procedures.

## Lockout/Tagout (LOTO)

The OSHA Control of Hazardous Energy Standard, often referred to as the Lockout/Tagout Standard, 29 CFR 1910.147, identifies the practices and procedures necessary to shut down and lockout or tagout machines and equipment. It requires that employees receive training in their role in the lockout/tagout program, and mandates that periodic inspections be conducted to maintain or enhance the energy control program and to verify that the procedures are being followed and lockout devices and/or tags are being used properly.

This rule requires that, in general, before service or maintenance is performed on machinery or equipment, the machinery or equipment must be turned off and disconnected from the energy source, and the energy-isolating device must be either locked or tagged out.

## Scope and Application

The lockout/tagout standard applies to general industry employment and covers the servicing and maintenance of machines and equipment in which the unexpected start-up or the release of stored energy could cause injury to employees. (If employees are performing service or maintenance tasks that do not expose them to the unexpected release of hazardous energy, the standard does not apply.)

The standard establishes minimum performance requirements for the control of hazardous energy.

The standard does not apply in the following situations:

- While servicing or maintaining cord and plug connected electrical equipment. (The hazards must be controlled by unplugging the equipment from the energy source; the plug must be under the exclusive control of the employee performing the service and/or maintenance)
- During hot tap operations that involve transmission and distribution systems for gas, steam, water, or petroleum products when they are performed on pressurized pipelines; when continuity of service is essential, and shutdown of the system is impractical; and employees are provided with an alternative type of protection that is equally effective



## Servicing and/or Maintenance Operations

If a servicing activity - such as lubricating, cleaning, or un-jamming the equipment - takes place during production, the employee performing the servicing may be subjected to hazards that are not encountered as part of the operation itself. Workers engaged in these operations are covered by lockout/tagout when any of the following conditions occurs:

- The employee must either remove or bypass machine guards or other safety devices, resulting in exposure to hazards at the point of operation
- The employee is required to place any part of his or her body in contact with the point of operation of the operational machine or piece of equipment
- The employee is required to place any part of his or her body into a danger zone associated with a machine operating cycle

In the above situations, the equipment must be de-energized and locks or tags must be applied to the energy-isolation devices.

In addition, when normal servicing tasks - such as setting equipment up, and/or making significant adjustments to machines - do not occur during normal operations, employees performing such tasks are required to lock out or tag out if they can be injured by unexpected energization of the equipment.

## Minor Servicing Tasks

Employees performing minor tool changes and adjustments and/or other minor service activities during normal operations that are routine, repetitive, and integral to the use of the equipment are not covered by the lock out/tag out standard, provided the work is performed using alternative measures that give effective protection.

## Energy Control Program

The lock out/tag out rule requires that an established energy control program be designed that includes:

- Documented energy control procedures
- An employee training program
- Documented annual & periodic inspections to ensure procedures/requirements are being followed

The rule requires employers to establish a program to ensure that machines and equipment are isolated and inoperative before any employee performs service or maintenance where the unexpected energization, start up, or release of stored energy could occur and cause injury.

The purpose of the energy control program is to ensure that, whenever the possibility of unexpected machine or equipment start-up exists or when the unexpected release of stored energy could occur and cause injury, the equipment is isolated from its energy source(s) and rendered inoperative prior to servicing or maintenance.

The written procedures must identify the information that authorized employees must know in order to control hazardous energy during service or maintenance. If this information is the same for various

machines or equipment or if other means of logical grouping exists, then a single energy control procedure may be sufficient. If there are other conditions - such as multiple energy sources, different connecting means, or a particular sequence that must be followed to shut down the machine or equipment - then you must develop separate energy control procedures to protect employees.

The energy control procedure must outline the scope, purpose, authorization, rules and techniques that will be used to control hazardous energy sources as well as the means that will be used to enforce compliance. At a minimum, it includes, but is not limited to, the following elements:

- A statement on how the procedure will be used
- LOTO devices shall only be affixed by authorized employees
- The procedural steps needed to shut down, isolate, block, and secure each machine, or piece of equipment which will hold the isolating devices in a safe or off position
- The proper procedure for safely applying lockout or tagout devices to equipment to be isolated
- The proper procedure to follow to safely release the stored or residual energy
- The specific requirements for testing machines or equipment to determine and verify the effectiveness of locks, tags, and other isolating energy control measures are in place before work proceeds
- The proper procedures for safe removal, and transfer of lockout/tagout devices and who has the responsibility for them
- Where multiple individuals or groups are working under the protection of a group LOTO device, one authorized individual is to ascertain the exposure status of the machine or equipment for the affected work forces, and to coordinate the work forces to ensure continuity of protection
- In addition, before lockout or tagout devices are removed and energy is restored to the machines or equipment, certain steps must be taken to re-energize equipment after service is completed, including:
  - » assuring that machines or equipment components are operationally intact
  - » notifying affected employees that lockout or tagout devices are removed from each energy isolating device by the employee who applied the device

Note: If multiple energy sources are involved, and a different means of connecting to the sources or if specific sequences must be followed to shut down the machine or equipment are needed, the employer must develop separate energy control procedures to protect the employees.

## Energy-Isolating Devices

The primary tool for providing protection under the rule is the energy-isolating device, which is the mechanism that prevents the transmission or release of energy and to which all locks or tags are attached. This device guards against accidental machine or equipment start-up or the unexpected re-energization of equipment during servicing or maintenance. There are two types of energy-isolating devices: those capable of being locked and those that are not. OSHA acknowledges that not all equipment can be locked out and allows the use of tags but the standard clearly specifies that “whenever major replacement, repair, renovation or modification of the machine or equipment is performed, and whenever new machines or new equipment is installed, the employer must ensure that energy isolating devices are lockable.” The standard differentiates between the existence of these two conditions and the employer and employee responsibilities in each case.

When the energy-isolating device cannot be locked out, the equipment must be tagged-out.

When using tagout, employers must comply with all tagout-related provisions of the rule and, in addition to the normal training required for all employees, must train employees in the following limitations of tags:

- Tags are essentially warning devices affixed to energy-isolating devices and do not provide the physical restraint of a lock
- When a tag is attached to an isolating means, it is not to be removed except by the person who applied it, and it is never to be bypassed, ignored, or otherwise defeated
- Tags must be legible and understandable by all employees
- Tags and their means of attachment must be made of materials that will withstand the environmental conditions encountered in the workplace
- Where tags are used instead of locks they are to be affixed in the same point of where a lock would be used if possible to clearly indicate the operation of movement of energy isolating devices are in a safe or off position. If this is not possible, tags are to be located as close as safely possible to the device so that it is immediately obvious to prevent activation by anyone
- Tags may evoke a false sense of security. They are only one part of an overall energy control program
- Tags must be securely attached to the energy-isolating devices so that they cannot be detached accidentally during use

## Employee Training

Initial training and retraining must be provided as necessary and must be certified that such training has been given to all employees covered by the rule. The certification must contain each employee's name and dates of training.

There are three types of employees - authorized, affected and other. The amount and kind of performance based training that each employee receives is based upon:

- The relationship of that employee's job to the machine or equipment being locked or tagged out, and
- The degree of knowledge relevant to hazardous energy that the employee must possess

The training program for authorized employees (those who are charged with the responsibility for implementing the energy control procedures and performing the service and maintenance) must cover, at minimum, the following areas:

- Recognition of applicable hazardous energy sources
- Details about the type and magnitude of the hazardous energy sources present in the workplace
- The methods and means necessary to isolate and control those energy sources (i.e., the elements of the energy control procedure(s)) during all phases of the process, from preparing to shutdown to removal of controls and return to service

Affected employees (usually the machine operators or users) and all other employees only need to be able to:

- Recognize when the control procedure is being implemented/used
- Understand the purpose, function, and restrictions of the procedure
- Know the importance of not attempting to start up or use the equipment that has been locked or tagged out
- When releasing stored energy all equipment must be at the “zero energy state” before servicing or maintenance work can begin (to get this “zero energy state” all valves are to be drained, air is to be bled from the system, stored hydraulic pressure is to be eliminated, and the method that is detailed by the company procedures must be used for each piece of equipment)

When tagout measures alone are used, training must emphasize that tags:

- Provide no physical restraint or protection
- Must not be removed, except by the person who applied the tag(s)
- Must never be by-passed, ignored, or otherwise defeated

Training which is performance-oriented, should deal with the equipment, type(s) of energy, and hazard(s) specific to the workplace being covered. The employer must verify/document that all employees understand the purpose, function and restrictions of the energy control program, and that authorized personnel have the knowledge and skills necessary for the safe application, use, and removal of energy controls.

Retraining must be provided, as required, whenever there is a change in job assignments, a change in machines, equipment or processes that present a new hazard, or a change in energy control procedures.

Additional retraining must be conducted whenever a periodic inspection reveals, or whenever there is a reason to believe, that there are deviations from or inadequacies in the employee’s knowledge or use of the energy control procedure.

## **LOTO Device and/or Tag Requirements**

LOTO devices must:

- Clearly indicate the identity of the employee using them
- Be of sufficient quality and durability to ensure effectiveness:
  - » Tags and lockout devices must be durable, substantial, identifiable, legible and understandable to all employees
  - » Devices and their means of attachment must be sufficient to meet the requirements of the workplace environment, not become illegible for the maximum duration of expected exposure
  - » Be substantial enough to prevent removal except by excessive force or special tools
  - » A tag’s means of attachment must be non-reusable
- Be standardized according to color, shape, print format and sized for easy recognition and must warn of hazardous conditions if the machines or equipment is energized
- Include a legend, e.g., DO NOT START, DO NOT OPEN, DO NOT CLOSE, or DO NOT OPERATE



## Outside Personnel (contractors, etc.)

The onsite employer and the outside employer must inform each other of their respective lockout or tagout procedures. Each employer must ensure that personnel understand and comply with all restrictions and/or prohibitions of the other employer's energy control program especially whenever servicing and/or maintenance is performed by a group rather than one person.

## Shift or Personnel Changes

Specific procedures must ensure the continuity of lockout or tagout protection during shift or personnel changes. At no time will a lockout/tagout tag or device that has been installed during a previous shift be removed by personnel on the next shift unless the employee that installed the tag or device has been contacted by supervision to verify all work has been completed and that a rigorous inspection of the locked out/tagged out equipment has been fully completed and it has been verified that it is safe to re-energize before the lockout/tagout tag or device is removed.

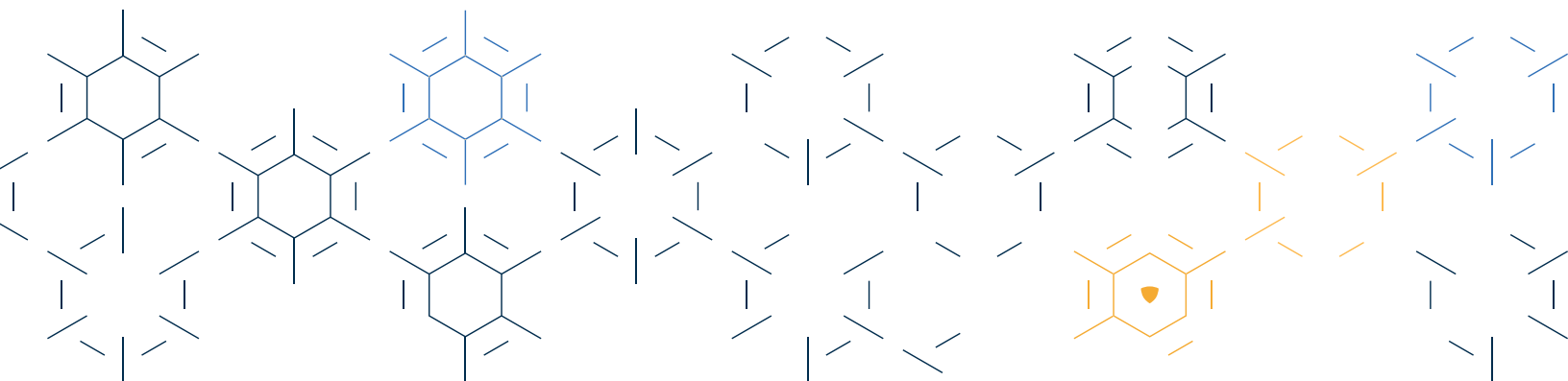
## Summary

LOTO applies to most sources of mechanical, hydraulic, pneumatic, chemical, thermal or other energy, but does not cover electrical hazards. Electrical hazards are regulated separately by OSHA.

The LOTO Standard does not apply if employees are performing service or maintenance tasks that do not expose them to unexpected start-up of machines or equipment, energization or release of stored energy.

The LOTO Standard does apply whenever:

- An employee must either remove or bypass machine guards or other safety devices, resulting in hazards at the point of operation
- An employee is required to place any part of their body in contact with the point of operations or the operational machine or piece of equipment
- An employee is required to place any part of their body into a danger zone associated with a machine operating cycle





# 19A CONTROL OF HAZARDOUS ENERGY TRAINING

## ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the Control of Hazardous Energy (Lock Out/Tagout) Standard as required per Federal OSHA Regulations 29 CFR 1910.147 and Cal OSHA Title 8 Regulations CCR 3390 and CCR 7183 if assigned roles and responsibilities will include procedures that have exposure to energized equipment.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

cc: Personnel File



SECTION 20

# Confined Spaces

# Confined Spaces

## Introduction

Many workplaces contain spaces that are considered to be “confined” because their configurations hinder the activities of any employees who must enter into, work in, and exit from them. In many instances, employees who work in confined spaces also face increased risk of exposure to serious physical injury from hazards such as entrapment, engulfment, and hazardous atmospheric conditions that may be immediately dangerous to life or health (IDLH). The OSHA Permit Required Confined Space Standard, 29CFR1910.146, contains requirements for practices and procedures to protect employees from the hazards of entry into permit required confined spaces.

Confinement itself may pose entrapment hazards, and work in confined spaces may keep employees closer to hazards, such as an asphyxiating atmosphere, than they would be otherwise. For example, confinement, limited access, and restricted or lack of airflow can result in hazardous conditions that would not arise in an open workplace.

The term “permit-required confined space” (i.e., permit space) refers to those spaces that meet the definition of a “confined space” and pose health or safety hazards, thereby requiring a specific program that spells out the precautions and procedures to be in place before a permit for entry can be issued.

## Policy

As a general policy, Paragon employees are not allowed to perform work in either confined spaces or “permit-required confined spaces”. Entry into these spaces requires specialized training, programs and management of these programs. It is however important for employees to understand and recognize what a “confined space” or “permit-required confined space” is and what should be done to avoid the hazard.

## Recognizing Confined Spaces

Three things constitute a confined space:

- It has limited or restricted means of entry or exit
- It is not large enough for an employee to enter and perform assigned work
- It is not designed for continuous occupancy by the employee

These spaces may include, but are not limited to, underground vaults, tanks, storage bins, pits and diked areas, vessels, and silos.

A permit-required confined space is one that meets the definition of a confined space and has one or more of these characteristics:

- It contains or has the potential to contain a hazardous atmosphere
- It contains a material that has the potential for engulfing an entrant
- It has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section
- It contains any other recognized serious safety or health hazards

## Responsibilities

The Client/facility owner is responsible for determining where confined spaces exist within the facility and then is to determine which confined spaces are permit required based on the hazards that are present per the standard. The Client has the responsibility for posting signs on all permit required confined space entries to warn exposed persons of the confined space hazard. The following language or similar language would satisfy the requirements for such a sign:

### **DANGER--PERMIT REQUIRED-CONFINED SPACE—DO NOT ENTER or AUTHORIZED ENTRANTS ONLY**

The Client/facility owner is also to develop and implement measures necessary to prevent unauthorized entry.

In general, when a Client/facility is determined to have confined spaces the Program Managers and Account Managers, as part of the workplace hazard assessment, are to obtain from the Client/facility owner a list of the locations of all site permit required confined spaces and must inform exposed employees of the existence, location, and danger posed by the spaces. This can be accomplished by indicating the hazards in the site Post Orders, and showing the employees where all permit required confined spaces are located as part of employee orientation upon being assigned to provide service at the facility.

## Training

It is the responsibility of the Program Managers and field supervision to provide documented instruction to Officers on:

- recognizing a confined space or permit-required confined space
- the hazards of entering a confined space
- the avoidance of a confined space and confined space entry
- what the site permit required confined space entry program consists of

## Conclusion

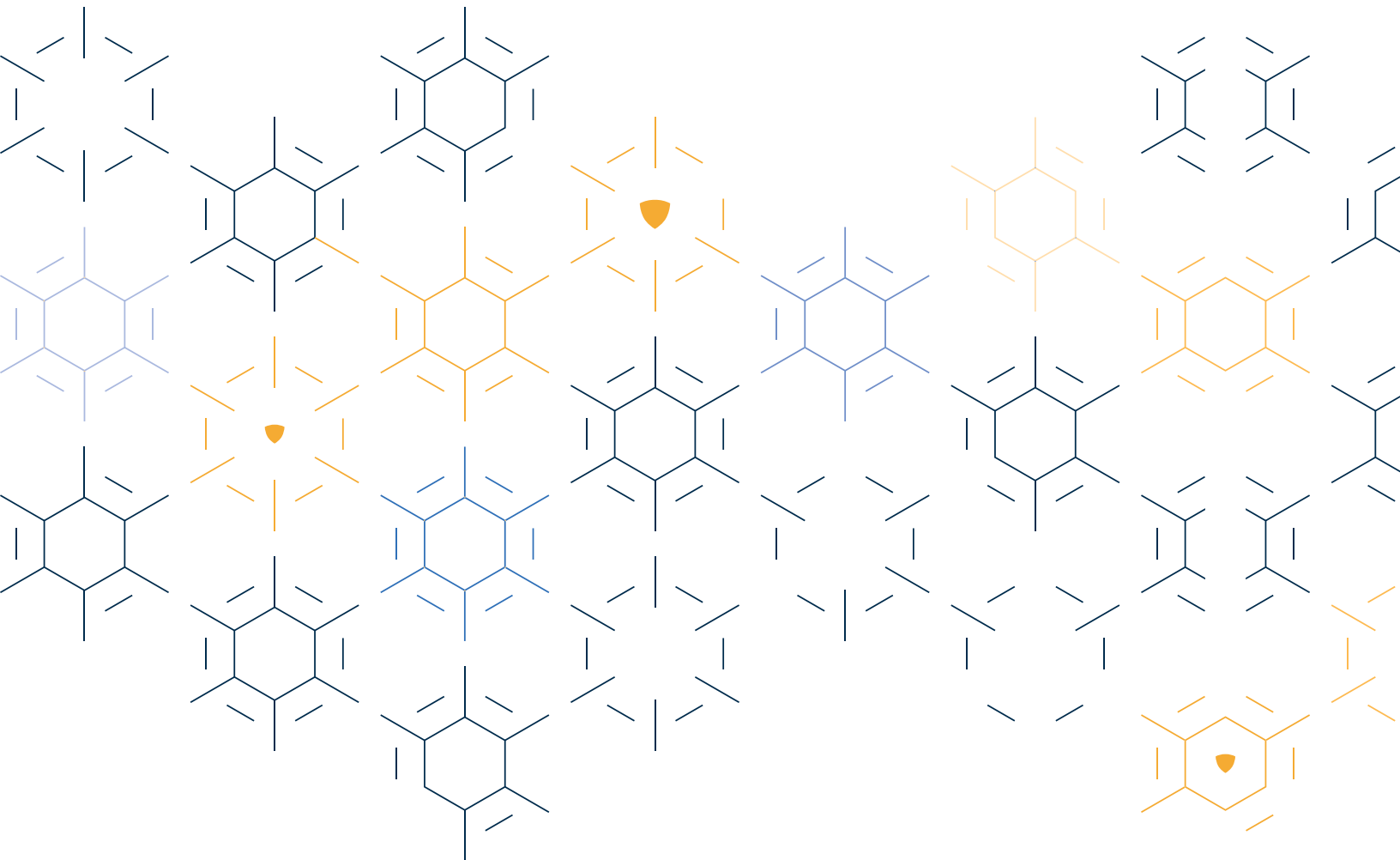
If Paragon Officers will be assigned to facilities that have confined spaces and permit required confined spaces, a list of the confined spaces and copy of the confined space entry program is to be obtained from the Client/facility owner and Officers are to receive documented training on the precautions they are to take regarding confined spaces. Paragon Officers are never to enter permit required confined spaces.

In very limited circumstances, where Paragon Officers are contractually required to perform services as part of the permit required confined space program at a Client facility (e.g. air sampling or monitoring of confined spaces, being an attendant, or performing non-entry rescue, etc.) a specific written program needs to be in place that specifically spells out Officer roles and responsibilities. The written program and documented performance based training is to be completed prior to assumption of any confined space duties. In addition, scheduled annual performance based refresher training is to be conducted to verify Officers fully understand and know how to perform their duties.

Resources to develop a site specific program if Paragon Officers are contractually required to perform confined space responsibilities include:

- Corporate Office
- Outside Consultants
- Client Personnel, etc.

Paragon Officers are not to be assigned or take on the responsibility of the Entry Supervisor for the purposes of approving and signing off of confined space entry permits. This responsibility is the client supervision or contractor supervision of the employees that will be entering or working in the permit required confined space.



# 20A CONFINED SPACE TRAINING ACKNOWLEDGEMENT

## PARAGON

I acknowledge that if being assigned to a site with permit required confined spaces that I have received information and training on the assigned duties to be performed as part of the Confined Space Standard and the permit required confined space program as required per Federal OSHA Regulations CFR 1910.146 and Cal OSHA Title 8 Regulations CCR 5156 -5158.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

cc: Personnel File



## SECTION 21

# Ergonomics



# Ergonomics

## Introduction

Ergonomics is defined as the science of fitting the workplace conditions and job demands/tasks to be performed, to human capabilities and limitations of the working population. It is considered to be the fit among person, tools, and task. Effective and successful “fits” promote high productivity, avoidance of illness and injury risks, and increased satisfaction among the workforce.

Ergonomic injuries consist of Musculoskeletal Disorders which include, Cumulative Trauma Disorder (CTD) which is a generic or descriptive title for a group of musculoskeletal injuries or disorders which are generally accepted to be work related.

- Carpal Tunnel Syndrome (CTS) which is an injury to the meta carpals or their supporting structures in the hand
- Repetitive Motion Injuries (RMI) which is the result of certain continued movements
- Repetitive Strain Injuries (RSI) which are the result of straining parts of the musculoskeletal structure in a repeated strain and heal cycle

Musculoskeletal disorders are the leading cause of disability of people in their working years, afflicting over 19 million workers. One-half of the nation's workforce is affected at some time during their working lives. Statistics show a steady increase in musculoskeletal disorders.

## Regulations

OSHA listed ergonomics as one of its most important initiatives for the 1990's. But OSHA's proposed ergonomics standard is still under evaluation. While it doesn't officially exist, it has made more changes in the work place than any standard in history as this proposed standard, is being enforced with citations issued under the OSHA “General Duty Clause”. Major fines have been issued for ergonomics violations.

While neither a general industry nor a construction ergonomics standard exists, there are definite policies and procedures that OSHA compliance officers expect to find in place in every workplace. The employer is required to evaluate all jobs for potential musculoskeletal injuries. This evaluation includes Screening Surveys, Job Hazard Analyses, and Periodic Surveys. Employers must then correct all ergonomic hazards identified. The employer must develop a written Ergonomics Protection Program (EPP).

Resources for developing an EPP can be obtained from the company's insurance carrier.

Employee training required by the OSHA standard must be provided for all employees who are at risk and include:

- signs and symptoms
- prevention
- use of special equipment
- engineering controls
- work practice controls
- administrative controls

## Ergonomic Factors

Preventing ergonomics injuries means that workers perform job tasks within the natural range of joints and body structures. For example the joints of the arm, elbow, and wrist have natural positions at which they are strongest and least stressed. The more the joints rotate from this optimum position the more there is a susceptibility to injury. As another example the neck and spine are “designed” to work with minimal compression and expansion of discs. Lifting or twisting that causes compression or expansion of the discs is likely to cause potential for ergonomic injuries. Contributing factors to ergonomic injuries include fatigue and congenital defects of the spine.

## Management of Ergonomics - Injuries Selection and Placement

Avoiding ergonomics injuries through employee selection and placement is the first step of managing ergonomics. When possible, factors that should be considered during the selection and placement process include:

- Poor posture - how one sits or stands
- Stressful living and working activities - staying in one position for too long or not learning to relax
- Faulty body mechanics - how one lifts, pushes, pulls or moves objects
- Repetitive lifting of awkward items, equipment, or (in health care facilities; patients)
- Repetitive motions (e.g. typing, hammering, screwing, assembly motions)
- Poor design of job or work station
- Excessive reaching or twisting
- Bending while lifting
- Static bent postures
- Heavy lifting
- Lifting with forceful movement



Employee selection and placement has been greatly impacted by the Americans with Disabilities Act (ADA). Since the ADA was passed, the legal right to consider the above factors in the employee selection and placement process has been greatly reduced. Adjustments to the workplace, work assignment, work schedule, work equipment etc., are all considered personal accommodation as required by the ADA.

Personal accommodation involves taking any steps necessary to make it possible for the disabled person to perform their job unless it proves to be “an undue hardship” to the employer.

Personal accommodation is required for persons with Cumulative Trauma Disorders (CTD's) since they are a “Protected Class” under the ADA. The ADA covers any disability that substantially impairs a major life activity (even temporarily). Performing manual work tasks is considered a “major life activity”.

## Prevention

While avoiding ergonomic injuries, when possible, through employee selection and placement is the first step of managing ergonomics, the second step is to prevent ergonomic injuries among current workers and control those that do occur. Prevention and control strategy is illustrated by the three legs of the Ergonomics Triangle:

- Force
- Frequency
- Posture

## The Ergonomics Triangle - removal/elimination

- Remove any leg of the triangle and prevent ergonomic injury
- Remove the force problems by eliminating heavy loads through automation
- Remove the frequency problems by eliminating non-value added motions
- Remove posture problems by understanding what joints can and cannot do and working within their range

## Prevention through Engineering Controls

Engineering controls are the preferred method of eliminating ergonomic risks. Engineering controls involve altering the task. When dealing with manual handling tasks this may be accomplished by eliminating the hazardous motion and/or changing the position of the arms, wrists or body, such as:

- Adjusting the height of a shelf, work station, seating device, or standing platform
- Work methods and stations should be designed to minimize the distance between the person and the object being handled
- Material handling tasks should be designed to minimize the weight, range of motion, and frequency of the activity
- Where feasible, reduction in the size or weight of the object lifted is desirable
- High strength push/pull requirements are undesirable, however pushing causes less stress to the body than pulling
- Bending the upper body and spine to reach into a bin or container is highly undesirable. The bins should be tilted or equipped with collapsible sides to provide easy access to the contents
- Repetitive or sustained twisting, stretching, or leaning to one side are undesirable. Corrections could include repositioning bins and moving closer to the employee to minimize repetitive movement
- Work bench or work station configurations can force people to bend over and tilt the head. Corrections should emphasize adjustments necessary for employee to remain in a relaxed upright stance or fully supported seated posture. Heavy objects should be stored at waist level. If weight cannot be minimized, mechanical assist lift devices should be considered/ provided
- Replacing high vibration equipment with ergonomically designed equipment with reduced vibration

## **Prevention through Administrative Controls and Work Practices**

Administrative controls and work practices should not be viewed as the primary methods of controlling ergonomic hazards. If engineering controls are not effective, then administrative controls and work practices may provide prevention of specific ergonomic injuries. Proper assessment techniques can be used to identify high-risk jobs and quantify the required job demands. Evaluation of tasks, jobs or work conditions that cause worker complaints of undue strain, localized fatigue, discomfort or pain that does not go away after overnight rest that may result from/involve workplace activities or equipment (e.g. repetitive and forceful exertions, frequent, heavy overhead lifts, awkward work positions or use of vibrating equipment) should be conducted to determine if changes are needed in workplace or equipment to remove the stressors to employees.

Worker training and education programs often offer the best opportunity for prevention through administrative controls and work practices. Such training and education programs range from fundamental instruction on the proper use of tools and materials, to instructions on emergency procedures, and use of protective devices. Ergonomics prevention training should be job specific and include exercise programs, stretching, etc.

Other administrative controls and work practices may include rotation of employees, a short break every hour, or the addition of employees. Standing for extended periods places excessive stress on the back and legs. Solutions include footrests or rails, resilient floor mats, height-adjustable chairs or stools, and opportunities for the employee to change position. Sitting is preferable to standing, but the chairs or stools must be properly chosen. Proper adjustable, height, lumbar support, and arm rests should be provided. Static seated postures with bending or reaching may have to be evaluated.

## **Prevention through Personal Protective Equipment**

In many areas of injury prevention, once engineering controls prove ineffective the next step is personal protective equipment (PPE). PPE for ergonomics injuries is largely untested and scientifically unproven. While many excellent devices are available there is little scientific evidence to prove their effectiveness. Since this type of PPE is largely unregulated it is difficult to be sure any PPE offers proper protection for the employee. Only verifiable proof of the effectiveness of PPE provides any reasonable level of protection for the employer from legal responsibility should the employee be injured.



## SECTION 22

# Fall Prevention (Walking and Working Surfaces)

# Fall Prevention (Walking and Working Surfaces)

## Introduction

Slips, trips, and falls (STF) constitute the majority of general industry accidents and cause 15% of all accidental deaths. STFs are second only to motor vehicles as a cause of fatalities. The OSHA standards 1910 Subpart D, 29CFR1910.21-30, for Walking and Working Surfaces apply to all permanent places of employment, except where domestic, mining, or agricultural work only is performed.

This section is intended to instruct Program Managers, Account Managers, Supervisors, and all employees to recognize a potentially hazardous condition that could result in a fall. In all instances, if an area does not meet these requirements, employees should be precluded/stopped from entering a hazardous condition.

Physical inspections and information from the client will help identify any areas that do not comply with the standard. Those areas identified must be clearly identified in the Post Orders, and training must take place to ensure the employees do not enter the area.

## General Requirements

### Housekeeping:

Some of the most frequently cited violations involve housekeeping:

- All places of employment, passageways, storerooms, and service rooms shall be kept clean and orderly and in a sanitary condition
- The floor of every workroom shall be maintained in a clean and, so far as possible, a dry condition. Where wet processes are used, drainage shall be maintained and false floors, platforms, mats or other dry standing places should be provided
- Every floor, working place and passageway shall be kept free from protruding nails, splinters, holes, or loose boards

### Aisles and Passageways:

- Aisles and passageways shall be kept clear and in good repair with no obstruction across or in aisles that could create a hazard
- Permanent aisles and passageways shall be appropriately marked
- Where mechanical handling equipment is used, sufficient safe clearances shall be allowed for aisles, at loading docks, through doorways and whenever turns or passage must be made. Aisles and passageways shall be kept clear and in good repairs, with no obstruction across or in aisles that could create a hazard. Improper aisle widths coupled with poor housekeeping and vehicle traffic can cause injury to employees, damage the equipment and material, and can limit egress in emergencies

### Covers and Guardrails:

Covers and/or guardrails shall be provided to protect personnel from the hazards of open pits, tanks, vats, ditches, etc.

## Floor Loading Protection:

Load rating limits shall be marked on plates of approved design and securely affixed and conspicuously posted by the owner of the building. It shall be unlawful to place, or cause, or permit to be placed, on any floor or roof of a building or other structure, a load greater than that for which such floor or roof is approved.

## Guarding Floor and Wall Openings and Holes:

Floor openings and holes, wall openings and holes, and the open sides of platforms may create hazards. People may fall through the openings or over the sides to the level below. Objects, such as tools or parts, may fall through the holes and strike people or damage machinery on lower levels.

OSHA standards for guarding openings and holes use the following definitions:

- **Floor hole:** An opening measuring less than 12 inches but more than 1 inch in its least dimension, in any floor, platform, pavement or yard, through which materials but not persons may fall (e.g. a belt hole, pipe opening or slot opening).
- **Floor opening:** An opening measuring 12 inches or more in its least dimension, in any floor, platform, pavement, or yard, through which persons may fall (e.g. a hatchway, stair or ladder opening, pit or large manhole). Floor openings occupied by elevators, dumb waiters, conveyors, machinery, or containers are excluded by OSHA Subpart D.
- **Platform:** A working space for persons elevated above the surrounding floor or ground (e.g. a balcony or platform for the operation of machinery or equipment)
- **Wall hole:** An opening less than 30 inches but more than 1 inch high of unrestricted width in any wall or partition (e.g. a ventilation hole or drainage scupper).
- **Wall opening:** An opening at least 30 inches high and 18 inches wide, in any wall or partition, through which persons may fall (e.g. a yard-arm doorway or chute opening).

## Protection for Floor Openings:

Standard railings shall be provided on all exposed sides of a stairway opening, except at the stairway entrance. For infrequently used stairways, where traffic across the opening prevents the use of a fixed standard railing, the guard shall consist of a hinged floor opening cover of standard strength and construction along with removable standard railings on all exposed sides, except at the stairway entrance.

A “standard railing” consists of top rail, mid rail, and posts, and shall have a vertical height of 42 inches nominal from the upper surface of top rail to floor, platform, runway, or ramp level. The top rail shall be smooth-surfaced throughout the length of the railing. The intermediate rail shall be approximately halfway between the top rail and the floor, platform, runway, or ramp.

A “standard toe board” is 4 inches nominal in vertical height from the top edge to the floor. It shall be securely fastened in place with not more than ¼-inch clearance above floor level.

Floor openings may be covered rather than guarded with rails. When the floor opening cover is removed, a temporary guardrail shall be in place, or an attendant shall be stationed at the opening to warn personnel.



Every floor hole into which persons can accidentally walk shall be guarded by either:

- A standard railing with toe board on all exposed sides
- Floor holes cover of standard strength and construction

While the cover is not in place, the floor hole shall be constantly attended by someone or shall be protected by a removable standard railing.

### **Protection of Open-Sided Floors, Platforms, and Runways:**

One of the most frequently cited violations in the requirement is that every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing (or the equivalent) on all open sides, except where there is an entrance to a ramp, stairway, or fixed ladder. The railing shall be provided with a toe board wherever, beneath the open sides:

- Persons can pass
- There is moving machinery
- There is equipment with which falling materials could create a hazard

Every runway shall be guarded by a standard railing on all sides 4 feet or more above floor or ground level. Wherever tools, machine parts, or materials are likely to be used on the runway, a toe board shall also be provided on each exposed side.

Regardless of height, open-sided floors, walkways, platforms, or runways above or adjacent to dangerous equipment, pickling or galvanizing tanks, degreasing units, and similar hazards shall be guarded with a standard railing and toe board.

## **Stairway Railings and Guards**

Every flight of stairs with four or more risers shall be equipped with standard stair railings or standard handrails as specified below. Stair width is measured clear of all obstructions except handrails.

On stairways less than 44 inches wide having both sides enclosed, at least one handrail shall be affixed, preferably on the right side descending.

On stairways less than 44 inches wide with one open side, at least one stair rail shall be affixed on the open side.

On stairways less than 44 inches wide having both sides open, one stair rail shall be provided on each side.

On stairways more than 44 inches wide, but less than 88 inches, one handrail shall be provided on each enclosed side and one stair rail on each open side.

On stairways 88 inches or more in width, one handrail shall be provided on each enclosed side, one stair rail on each open side, and one intermediate stair rail placed approximately in the middle of the stairs width.

A “standard stair railing” (stair rail) shall be of construction similar to a standard railing, but the vertical height shall be not more than 34 inches nor less than 30 inches from the upper surface of the top rail to the surface of the tread in line with the face of the riser at the forward edge of the tread.

A “standard handrail” consists of a lengthwise member mounted directly on a wall or partition by means of brackets attached to the lower side of the handrail in order to keep a smooth, unobstructed surface along the top and both sides of the handrail. The handrail will furnish an adequate handhold for anyone grasping it to avoid falling. The brackets shall give a clearance between the handrail and wall or any projection of at least 3 inches and be spaced no more than 8 feet apart. The handrails shall be mounted so that the complete structure is capable of withstanding a load of at least 200 lbs. applied in any direction at any point of the rail.

Winding stairs shall have a handrail that is offset to prevent walking on all portions of the treads where the width is less than 6 inches.

For wood railings, the posts shall be of at least 2” x 4” stock spaced no more than 6 ft. apart with the top and intermediate rails being at least 2” x 4” stock. If the top rail is made of two right angle pieces of 1” x 4” stock, posts may be spaced on 8 ft. centers with a 2” x 4” intermediate rail.

When inspecting the condition of the handrails, stair rails, or stairways in the workplace the following items are to be considered:

#### **Handrails and Stair rails:**

- Lack of rails
- Placement of rails
- Smoothness of surface of rails
- Strength of rails
- Clearance between rail and wall or other object

#### **Treads and Nosings:**

- Strength
- Slip resistance
- Dimensions
- Evenness of surface
- Visibility of leading edge (nosing)
- Improper/inadequate design, construction or location of staircases with uniform rise/tread height
- Wet, slippery, or damaged walking or grasping surfaces
- Improper illumination...there is no horizontal OSHA standard for illumination levels. The Illuminating Engineering Society publications should be consulted for recommendations
- Poor housekeeping

The length of a staircase is important. Long flights of steps without landings should be avoided whenever possible.

Vertical clearance above any stair tread to an overhead obstruction shall be at least 7 feet measured from the leading edge of the tread.

## Portable Ladders

The chief hazard when using a ladder is falling. A poorly designed, maintained, or improperly used ladder may collapse under the load placed upon it and cause the employee to fall.

A ladder is an appliance consisting of two side rails joined at regular intervals by crosspieces on which a person may step to ascend or descend.

The various types of portable ladders include:

- Three types of construction:
  - » Type I for heavy duty e.g. utilities, contractors, and industrial use
  - » Type II for medium duty e.g. painters, offices, and light industrial use
  - » Type III for light duty e.g. light household use
- Stepladder - A self-supporting portable ladder, non-adjustable in length, having flat steps and hinged back
- Single Ladder - A non-self-supporting portable ladder, nonadjustable in length, consisting of but one section. Its size is designed by overall length of the side rail.
- Extension Ladder - A non-self-supporting portable ladder adjustable in length.

OSHA's requirements for portable ladders include:

- Portable stepladders longer than 20 feet shall not be used
- Spacing of rungs or steps shall be on 12 inch centers
- Stepladders shall be equipped with a metal spreader or locking device of sufficient size and strength to securely hold the front and back sections in open position
- Single ladders longer than 30 feet shall not be used
- Extension ladders longer than 60 feet shall not be used and shall be in 2 sections with one fit within the side rails of the other and arranged so upper section can be raised and lowered
- Ladders shall be maintained in good condition at all times, the joints between steps and side rails shall be tight, all hardware and fittings securely attached, and the movable parts shall operate freely without binding or undue play
- Safety feet and other auxiliary equipment shall be kept in good condition to insure proper performance
- Rungs should be kept free of grease or oil, if exposed to grease or oil it shall be cleaned with solvent or steam
- Ladders shall be inspected frequently and those which have developed defects shall be withdrawn from service for repair or destruction and tagged or marked as "Dangerous, Do Not Use"
- Proper use of ladders is essential in preventing accidents. Even a good ladder can be a serious safety hazard when used by workers in a dangerous way

OSHA standards require the following safety precautions for ladder use. Not only are these OSHA's standards, but also company policy:

- Ladders shall be placed to prevent slipping with a secure footing, or they shall be lashed, or held in position. And portable ladders shall be placed where the side rails have a secure footing
- Ladders used to gain access to a roof or other area shall extend at least 3 feet above the point of support, at eave, gutter, or roof line
- The foot of a ladder shall, where possible, be used at such a pitch that the horizontal distance from the top support to the foot of the ladder is one-quarter of the working length of the ladder (the length along the ladder between the foot and the support)
- The worker shall always face the ladder when climbing up or down
- Short ladders shall not be spliced together to make long ladders
- Ladders shall never be used in the horizontal position as scaffolds or work platforms
- The top of a regular stepladder shall not be used as a step
- Bracing on the back of step ladders is designed solely for increasing stability and are not to be used for climbing
- Use both hands when climbing and descending ladders
- Metal ladders shall never be used near electrical equipment or placed in front of doors that open toward the ladder unless the door is blocked open, locked or guarded
- Ladders with broken or missing steps, rungs, or cleats, broken side rails, or other faulty equipment shall not be used, and improvised repairs shall not be made

## **Fixed Ladders**

Are to be designed to a live load of 200 lbs. with rungs at a minimum of  $\frac{3}{4}$ " for metal ladders and  $\frac{1}{8}$ " for wood ladders at a 12" maximum spacing and at least 16" wide. Ladders are to be treated or painted to prevent corrosion, rusting, or decay.

A fixed ladder is a ladder permanently attached to a structure, building, or equipment and has a back or the ladder minimum clearance of 7" except when unavoidable obstructions are encountered.

All fixed ladders with a length of more than 20 feet to a maximum unbroken length of 30 feet shall be equipped with cages or a ladder safety device.

A "cage" is a guard that is fastened to the side rails of the fixed ladder or to the structure to encircle the climbing space of the ladder for the safety of the person who must climb the ladder.

Cages shall extend a minimum of 42 inches above the top of a landing, unless other acceptable protection is provided.

Cages shall extend down the ladder to a point not less than 7 feet nor more than 8 feet above the base of the ladder.

A ladder safety device is any device, other than a cage or well, designed to eliminate or reduce the possibility of accidental falls and may incorporate such features as life belts, friction brakes, and sliding attachments.

Another feature of fixed ladders is the landing platform which provides a means of interrupting a free fall and serves as a resting place during long climbs.

When fixed ladders are used to ascend to heights exceeding 20 feet (except on chimneys), landing platforms shall be provided for each 30 feet of height or fraction thereof, when cages are used, except that, where no cage, well, or ladder safety device is provided, landing platforms shall be provided for each 20 feet of height or fraction thereof.

Ladder safety devices may be used on tower, water tank, and chimney ladders over 20 feet in unbroken length in lieu of cage protection. No landing platform is required in these cases.

The preferred pitch of fixed ladders shall be considered to come in the range of 75 degrees and 90 degrees with the horizontal. Fixed ladders shall be considered to be substandard if they are installed within the pitch range of 60 and 75 degrees with the horizontal. Substandard fixed ladders are permitted only where it is found necessary to meet conditions of installation. This substandard pitch range shall be considered as a critical range to be avoided, if possible.

Ladders having a pitch in excess of 90 degrees with the horizontal are prohibited.

As with all ladders, fixed ladders shall be maintained in a safe condition and inspected regularly.

## **Safety Requirements for Scaffolding**

While services for clients generally do not place an employee to work on scaffolding, it is important that the employee is aware of what scaffolding is. As a general policy, Paragon employees do not perform work on/around scaffolding. Where services to be provided require Officers to do so, it should be outlined specifically in our scope of work, and a site specific program must be developed by the responsible Program Manager or Account Manager and incorporated into the Post Orders.

There are a number of different types of scaffolds available. No attempt will be made here to deal with every unit individually.

It is important, however, to note some of the general requirements which apply to all scaffolds, namely:

The footing or anchorage for scaffolds shall be sound, rigid and capable of carrying the maximum intended load without settling or displacement. Unstable objects, such as barrels, boxes, loose brick, or concrete blocks shall not be used to support scaffolds or planks.

All scaffolding is to be erected by competent and experienced personnel.

All parts of the scaffold e.g. bolts, nuts, fittings, clamps, and fastenings shall be maintained in sound and good working condition and shall be inspected before each installation and periodically thereafter.

Scaffolds and their components shall be capable of supporting at least four times the maximum intended load.

Scaffolds shall be maintained in a safe condition and shall not be altered or moved horizontally while they are in use or occupied.

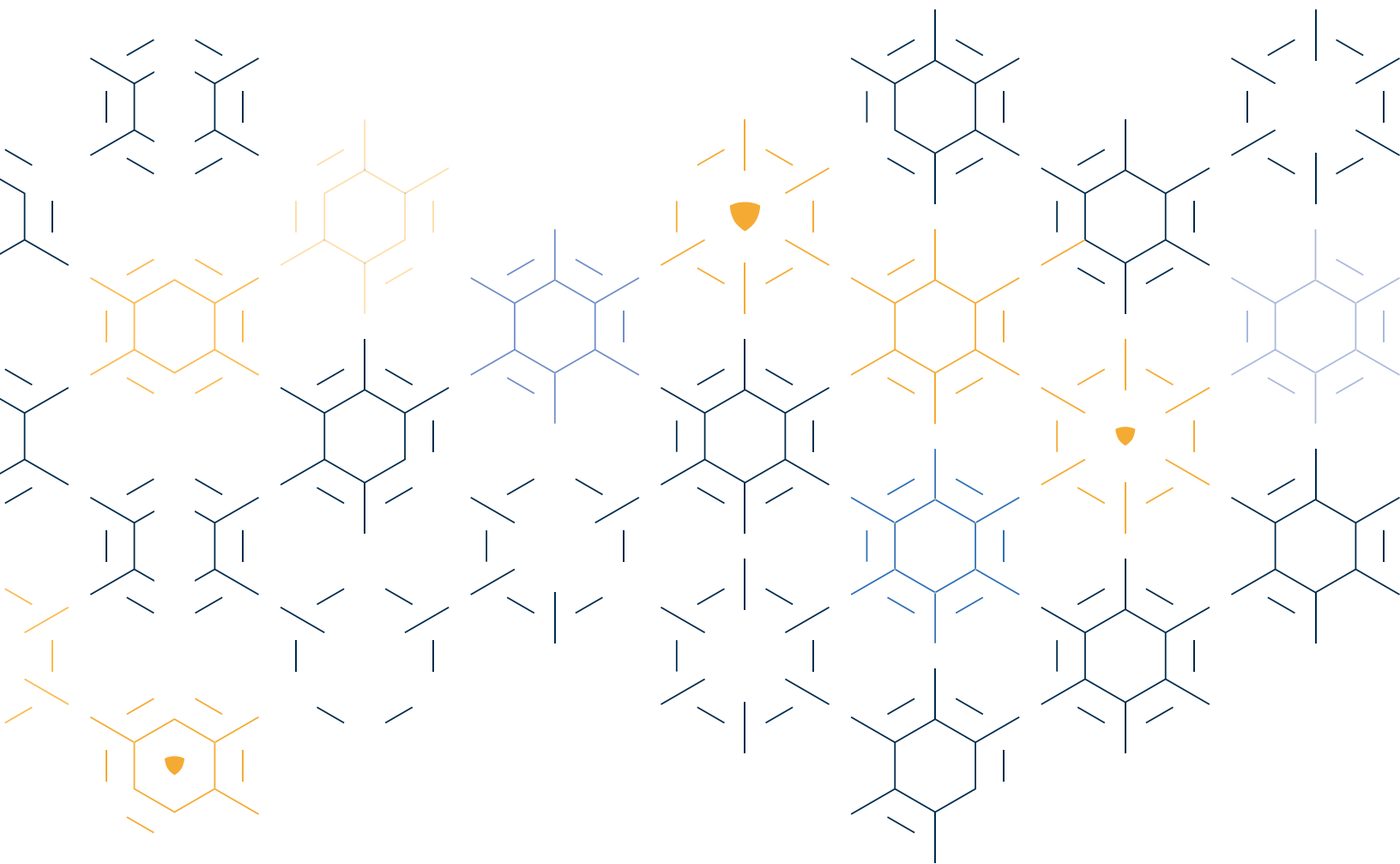
Damaged or weakened scaffolds shall be immediately repaired and shall not be used until repairs have been completed.

A safe means must be provided to gain access to the working platform level through the use of a ladder, ramp, etc.

Overhead protection must be provided for personnel on a scaffold exposed to overhead hazards. Guardrails, mid-rails, and toe boards must be installed on all open sides and ends of platforms more than 10 feet above the ground or floor. Wire mesh must be installed between the toe board and the guardrail along the entire opening, where persons are required to work or pass under the scaffolds.

Each person working from a scaffold shall be protected by a safety lifebelt attached to a lifeline that is securely attached to substantial members of the structure (not scaffold) or to securely rigged lines, which will safely suspend the workman in case of a fall.

Employees shall **not** work on scaffolds during storms or high winds or when covered with ice or snow.





## SECTION 23

# Hearing Conservation

(Occupational Noise Exposure - 29CFR1910.95)



# Hearing Conservation (Occupational Noise Exposure – 29CFR1910.95)

## Introduction

While the majority of our employees will not be exposed to noise elements that require a Hearing Conservation program due to the amount of time they may spend in high noise areas while performing their assigned duties, it is important for all employees and management to understand what constitutes such a program, and when a program is warranted. Each Program Manager and Account Manager is responsible for determining the need for such a program. The client should be contacted to determine any potential hazard in their facility, and a copy of their program should be obtained.

## Background

It is estimated by OSHA that there are millions of workers in American production industries who experience 8-hour noise exposures in excess of 90 dBA (decibels on the A scale), and many more experience exposure levels in excess of 85 dBA. The Hearing Conservation Amendment (HCA) applies to all employees except for those in oil and gas well drilling and service industries, which are specifically exempted. Additionally, the Amendment does not apply to those engaged in construction and agriculture, although a Construction Industry Noise Standard exists.

## The Occupational Noise Standard

Prior to promulgation of the HCA, the existing Noise Standard established a permissible noise exposure level of 90 dBA for 8 hours and required the employer to reduce exposure to that level by use of feasible engineering and administrative controls. In all cases in which sound levels exceeded the permissible exposure, regardless of the use of hearing-protective devices, “a continuing, effective hearing conservation program” was required.

All employees whose noise exposures equal or exceed an 8-hour time-weighted-average (TWA) of 85 dBA, referred to as the action level, must be included in a hearing conservation program comprised of five basic components:

- Exposure monitoring
- Audiometric testing
- Hearing protection
- Employee training
- Recordkeeping

*Note: that although the 8-hour TWA permissible exposure remains 90 dBA, a hearing conservation program becomes mandatory at an 8-hour TWA exposure of 85 dBA.*

## Monitoring

The HCA requires employers to monitor noise exposure levels in a manner that will accurately identify employees who are subjected to an 8-hour TWA exposure of 85 dBA or more. The exposure measurement must include all noise within an 80 - 130 dBA range. The requirement is performance oriented and allows employers to choose the monitoring method that best suits each situation.

Employees are entitled to observe monitoring procedures and, in addition, they must be notified of the results of exposure monitoring. However, the method used to notify employees is left to the discretion of the employer.

Employers must re-monitor workers' exposures whenever changes in exposures are sufficient to require new hearing protectors or whenever employees not previously included in the program because they were not exposed to an 8-hour TWA of 85 dBA are included in the program.

Instruments used for monitoring employee exposures must be calibrated to ensure that the measurements are accurate. Since calibration procedures are unique to specific instruments, employers should follow the manufacturer's instructions to determine when and how extensively to calibrate.

## **Audiometric Testing Program**

Audiometric testing not only monitors employee hearing acuity over time but also provides an opportunity for employers to educate employees about their hearing and the need to protect it. The audiometric testing program includes obtaining baseline audiograms and annual audiograms and initiating training and follow-up procedures.

The audiometric testing program should indicate whether hearing loss is being prevented by the employer's hearing conservation program. Audiometric testing must be made available to all employees who have an average exposure which are equal to or exceed an 8-hour time-weighted average of 85 dBA. The program shall be provided at no cost to employees.

Audiometric tests shall be performed by a professionally licensed or certified audiologist, otolaryngologist, or physician or by a technician who is certified by the Council of Accreditation of Occupational Hearing Conservation. A technician who performs audiometric tests must be responsible to an audiologist, otolaryngologist, or physician.

Professional responsibilities include:

- overseeing the program and the work of the technicians
- reviewing problem audiograms
- and determining whether referral is necessary

Either a professional or a trained technician may conduct audiometric testing.

In addition to administering audiometric tests, the tester (or the supervising professional) is also responsible for ensuring that the tests are conducted in an appropriate test environment, for seeing that the audiometer works properly, for reviewing audiograms for standard threshold shifts (as defined in the HCA), and for identifying audiograms that require further evaluation by a professional.

## **Baseline and Annual Audiograms**

There are two types of audiograms required in the hearing conservation program: baseline and annual audiograms. Baseline audiograms must be provided within 6 months of an employee's first exposure at or above a TWA of 85 dBA. The baseline audiogram is the reference audiogram against which future annual audiograms are compared. Annual audiograms are required after obtaining the baseline audiogram.

Where mobile test vans are used to meet the audiometric testing obligation, the employer shall obtain a valid baseline audiogram within 1 year of an employee's exposure at or above the action level. Where baseline audiograms are obtained more than 6 months to the employee's first exposure at or above the action level, employees shall wear hearing protectors for any period exceeding 6 months after the first exposure until the baseline audiogram is obtained.

Testing to establish a baseline audiogram shall be preceded by at least 14 hours without exposure to workplace noise, however hearing protectors may be used as a substitute for the requirement. The employer shall notify employees of the need to avoid high levels of non-occupational noise during the 14-hour period immediately preceding the audiometric examination.

## **Evaluation of Audiograms**

Annual audiograms must be routinely compared to baseline audiograms to determine whether the audiogram is accurate and whether the employee has lost hearing ability; i.e., to determine whether a Standard Threshold Shift (STS) has occurred. An STS is a change in hearing threshold relative to the baseline audiogram of an average of 10 dBA or more at 2000, 3000, AND 4000 Hertz (Hz) in either ear. In determining whether a STS has occurred, allowance may be made for the contribution of aging (presbycusis) to the change in hearing level by correcting the annual audiogram per the procedure designated in the standard.

If an STS is identified, the employee must be fitted or refitted with adequate hearing protectors, instructed in how to use them, and required to wear them. In addition, employees must be notified in writing within 21 days from the time the determination is made that their audiometric test results indicate an STS.

Some employees with an STS may need to be referred for further testing if the professional determines that their test results are questionable or if they have an ear problem of a medical nature caused or aggravated by wearing hearing protectors. If the suspected medical problem is not thought to be related to wearing protectors, employees must merely be informed that they should see a physician.

## **Audiometric Test Requirements**

Audiometric tests shall be pure tones, air conduction, hearing threshold examinations, with test frequencies including as a minimum 500, 1000, 2000, 3000, 4000, and 6000 Hz. Tests at each frequency shall be taken separately for each ear. Audiometric examinations shall be administered in a room meeting the requirements of the standard.

The audiometer shall be checked before each daily use for functional operation to make sure the output is free from distorted or unwanted sounds. And an audiometer calibration shall be checked acoustically at least annually in accordance to the standard.

## **Hearing Protectors**

Hearing protectors must be made available to all workers exposed to and 8-hour TWA of 85 dBA or greater at no cost to the employees. This requirement will ensure that employees have access to protectors before they experience a loss in hearing. The use of hearing protectors is also mandatory for employees who have experienced STSs, since these workers are particularly susceptible to noise.

With the help of a person who is trained in fitting hearing protectors, employees shall be given the opportunity to select their hearing protectors from a suitable variety provided by the employer. The protector selected should be comfortable to wear and offer sufficient attenuation to prevent hearing loss.

Hearing protectors must attenuate employee exposure at least to an 8-hour TWA of 90 dBA, and for employees that experienced an STS the hearing protectors must attenuate employee exposure to an 8-hour TWA of 85 dBA or below.

Employees must be shown how to use/properly install and care for their protectors, and they must be supervised on the job to ensure that they continue to wear them correctly. Hearing protectors shall be replaced as necessary.

Whenever employee noise exposures increase to the extent that the hearing protectors that are provided may no longer provide adequate attenuations, more effective hearing protectors shall be provided.

## **Training**

Where Officers are exposed to noise at or above the 8-hour TWA of 85 dBA a training program shall be instituted to ensure employee participation in the program. The training program shall be repeated annually for each employee included in the hearing conservation program. And, information provided shall be updated to be consistent with changes in protective equipment and work processes.

Employee training is important because when workers understand the hearing conservation program's requirements and why it is necessary to protect their hearing, they will be better motivated to actively participate in the program and therefore be more willing to cooperate by wearing their protectors and undergoing audiometric tests.

Employees exposed to TWAs of 85 dBA and more must undergo at least annual training in the following:

- Effects of noise
- Purpose, advantages, disadvantages, and attenuation characteristics of various types of hearing protectors
- Selection, fitting, use, and care of protectors
- Purposes and procedures of audiometric testing

The training requirements are such that employees must be reminded on a yearly basis that noise is hazardous to hearing, and that they can prevent damage by wearing hearing protectors, when appropriate, and by participating in audiometric testing.

## **Recordkeeping**

Noise exposure measurement records must be retained for 2 years. Records of audiometric test results must be maintained for the duration of the affected employee's employment. Audiometric test records must include:

- the name and job classification of the employee
- the date the audiogram test was performed
- the examiner's name

- the date of acoustic or exhaustive calibration of the audiometer
- measurements of the background sound pressure levels in audiometric test room
- the employee's most recent noise exposure measurement

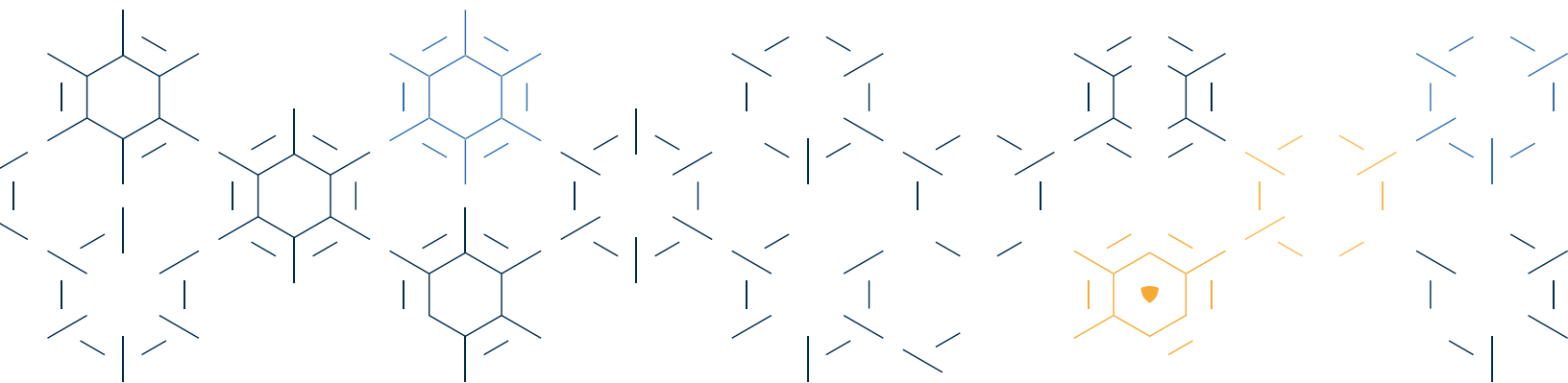
All records required by this section shall be provided upon request to employees, former employees, representatives designated by the individual employee and OSHA.

## Responsibilities

Where a client facility has high noise levels the Program Manager is to meet with the client to determine if noise level area testing has been conducted to indicate what the levels are throughout the facility, and if all areas that exceed 90 dBA are properly posted. If it is determined that the Officers assigned to the facility could exceed the 8-hour TWA of 85 dBA, the Program Manager's responsibility in this type of program includes having noise dosimeter measurements taken to verify if Officer exposure does or does not require that a hearing conservation program needs to be implemented. Initiating noise control measures, undertaking the audiometric testing of employees, providing hearing protective equipment where it is required, enforcing the use of such protective equipment with sound policies and by example, informing employees of the benefits to be derived from a hearing conservation program, and providing annual training. If employee exposures do not exceed the 8-hour TWA of 85 dBA because amount of time spent while making rounds in high noise areas, as a minimum, employees are to be instructed to always wear hearing protection in all areas that exceed the 90 dBA level.

Additionally, OSHA requires employers to make available to affected employees or their representatives copies of the OSHA noise standard and also post a copy in the workplace.

It is the employee's responsibility to make proper use of the protective equipment provided by management. It is also the employee's responsibility to observe any rules or regulations in the use of equipment designed to minimize noise exposure.





## SECTION 24

# Portable and Power Tool Safety



# Portable and Power Tool Safety

## Introduction

Tools are such a common part of our lives that it is difficult to remember that they may pose hazards. All tools are manufactured with safety in mind but, tragically, a serious accident often occurs before steps are taken to search out and avoid or eliminate tool-related hazards.

Per OSHA, each employer shall be responsible for the safe condition of tools and equipment used by employees, including tools and equipment which may be furnished by employees.

In the process of removing or avoiding the hazards, workers must learn to recognize the hazards associated with the different types of tools and the safety precautions necessary to prevent those hazards.

## Hand Tools

Hand tools are non-powered. They include anything from axes to wrenches. The greatest hazards posed by hand tools result from misuse and improper maintenance. Some examples:

- Using a screwdriver as a chisel may cause the tip of the screwdriver to break and fly, hitting the user or other employees
- If a wooden handle on a tool such as a hammer or an axe is loose, splintered, or cracked, the head of the tool may fly off and strike the user or another worker
- A wrench must not be used if its jaws are sprung, because it might slip
- Impact tools such as chisels, wedges, or drift pins are unsafe if they have mushroomed heads. The heads might shatter on impact, sending sharp fragments flying

The company is responsible for the safe condition of tools and equipment used by employees but the employees have the responsibility for properly using and maintaining tools.

Supervisors and Management should caution employees that saw blades, knives, or other tools be directed away from aisle areas and other employees working in close proximity. Knives and scissors must be sharp. Dull tools can be more hazardous than sharp ones.

Appropriate personal protective equipment, e.g., safety goggles or glasses, gloves, etc., should be worn due to hazards that may be encountered while using portable power tools and hand tools.

As a safety precaution, floors should be kept as clean and dry as possible to prevent accidental slips, trips, or falls when handling/using dangerous hand tools.

While working around flammable substances, sparks produced by iron and steel hand tools can be an ignition source. Where this hazard exists, the use of spark-resistant tools made from brass, plastic, aluminum, or wood will eliminate the hazard.



## Power Tool Precautions

Employees should be trained in the use of all tools - not just power tools. They should understand the potential hazards as well as the safety precautions to prevent those hazards from occurring.

Power tools can be hazardous when improperly used. These types of tools are either electric, pneumatic, liquid fuel, hydraulic, or powder-actuated powered.

The following general precautions should be observed by power tool users:

- Never carry a tool by the cord or hose
- Never yank the cord or the hose to disconnect it from the receptacle
- Keep cords and hoses away from heat, oil, and sharp edges
- Disconnect tools when not in use, before servicing, and when changing accessories such as blades, bits and cutters
- All observers should be kept at a safe distance away from the work area
- Secure work with clamps or a vise, freeing both hands to operate the tool
- Avoid accidental starting. The worker should not hold a finger on the switch button while carrying a plugged-in tool
- Tools should be maintained with care. They should be kept sharp and clean for the best performance. Follow instructions in the user's manual for lubricating and changing accessories
- Be sure to keep good footing and maintain good balance. Do not lean over or on top of the work being performed if tool will cause separation of materials or break through the material as pressure caused while leaning across material or pushing against the power tool could result in sudden release and body could lurch forward and potentially fall
- The proper apparel should be worn. Loose clothing, ties, or jewelry can become caught in moving parts
- All portable electric tools that are damaged shall be removed from use and tagged "Do Not Use"
- Use the appropriate tool for the task/job being performed

## Guards

Hazardous moving parts of a power tool need to be safeguarded. For example, 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.

Guards, as necessary, should be provided to protect the operator and others from the following:

- point of operation
- in-running nip points
- rotating parts
- flying chips and sparks

Safety guards must never be removed when a tool is being used.

For example, portable circular saws must be equipped with guards. An upper guard must cover the entire blade of the saw. A retractable lower guard must cover the teeth of the saw, except when it makes contact with the work material. The lower guard must automatically return to the covering position when the tool is withdrawn from the work.

## **Safety Switches**

The following hand-held powered tools must be equipped with a momentary contact “on-off” control switch: drills, tappers, fastener drivers, horizontal, vertical and angle grinders with wheels larger than 2 inches in diameter, disc and belt sanders, reciprocating saws, saber saws, and other similar tools. These tools also may be equipped with a lock-on control for continuous operation provided that turnoff of the tool can be accomplished by a single motion of the same finger or fingers that turns it on.

The following hand-held powered tools may be equipped with only a positive “on-off” control switch:

- platen sanders
- disc sanders with discs 2 inches or less in diameter
- grinders with wheels 2 inches or less in diameter
- routers
- planers
- laminate trimmers
- nibblers
- shears
- scroll saws
- jigsaws with blade shanks ¼-inch wide or less

Other hand-held powered tools such as circular saws having a blade diameter greater than 2 inches, chain saws, and percussion tools without positive accessory holding means must be equipped with a constant pressure switch that will shut off the power when the pressure is released.

## **Electric Tools**

Employees using electric tools must be aware of several dangers; the most serious is the possibility of electrocution.

Among the chief hazards of electric-powered tools are burns and slight shocks which can lead to injuries or even heart failure. Under certain conditions, even a small amount of current can result in fibrillation of the heart and eventual death. A shock also can cause the user to fall off a ladder or other elevated work surface.

To protect the user from shock, tools must either have a three-wire cord with ground or be grounded, be double insulated, or be powered by a low-voltage isolation transformer. Three-wire cords contain two current-carrying conductors and a grounding conductor. One end of the grounding conductor connects to the tool’s metal housing. The other end is grounded through a prong on the plug. Anytime an adapter is used to accommodate a two-hole receptacle, the adapter wire must be attached to a known ground. The third prong should never be removed from the plug.

The use of double insulated electric power tools is more convenient. The user and the tools are protected in two ways: by normal insulation on the wires inside, and by a housing that cannot conduct electricity to the operator in the event of a malfunction.

These general practices should be followed when using electric tools:

- Electric tools should be operated within their design limitations
- Gloves and safety footwear are recommended during use of electric tools
- When not in use, tools should be stored in a dry place
- Electric tools should not be used in damp or wet locations
- Work areas should be well lighted

## **Powered Abrasive Wheel Tools**

Powered abrasive grinding, cutting, polishing, and wire buffing wheels create special safety problems because they may throw off flying fragments during use.

Before an abrasive wheel is mounted, it should be inspected closely and sound or ring-tested to be sure that it is free from cracks or defects. To test, wheels should be tapped gently with a light non-metallic instrument. If they sound cracked or dead, they could fly apart in operation and so must not be used. The sound an undamaged wheel will give is a clear metallic tone or “ring.”

To prevent the abrasive wheel from cracking, the user should be sure the wheel fits freely on the spindle and that the spindle nut has been tightened enough to hold the wheel in place, without distorting the flange. Be sure to always follow the manufacturer’s recommendations when replacing the wheel. Care must be taken to assure that the spindle wheel will not exceed the abrasive wheel specifications.

Due to the possibility of a wheel disintegrating (exploding) during start-up, the employee should never stand directly in front of the wheel as it accelerates to full operating speed.

Portable grinding tools need to be equipped with safety guards to protect workers not only from the moving wheel surface, but also from flying fragments in case of breakage. In addition, when using a powered grinder:

- Always use eye protection
- Turn off the power when not in use
- Never clamp a hand-held grinder in a vise

## **Pneumatic Tools**

Pneumatic tools are powered by compressed air and include chippers, drills, hammers, and sanders. There are several dangers encountered in the use of pneumatic tools. The main one is the danger of getting hit by one of the tool’s attachments or by some kind of fastener the worker is using with the tool.

Eye protection is required and face protection is recommended for employees working with pneumatic tools.

Noise is another hazard. Working with noisy tools such as jackhammers requires proper, effective use of hearing protection. Depending on the noise levels generated, ear plugs, ear muffs or both may need to be worn to reduce the levels of noise exposure to acceptable levels.

When using pneumatic tools, employees must check to see that they are fastened securely to the hose to prevent them from becoming disconnected. A short wire or positive locking device attaching the air hose to the tool will serve as an added safeguard to prevent the hose and tool from separating unexpectedly.

A safety clip or retainer must be installed to prevent attachments, such as chisels on a chipping hammer, from being unintentionally shot from the barrel.

Screens must be set up to protect nearby workers from being struck by flying fragments around chippers, riveting guns, staplers, or air drills.

Compressed air guns should never be pointed toward anyone. Users should never “dead-end” it against themselves or anyone else.

And safety devices are never to be defeated or disconnected.

## **Powder-Actuated Tools**

Powder-actuated tools are actuated by explosives or any similar means that propel a stud, pin, fastener or other object for the purpose of affixing it by penetration to any other object. They operate like a loaded gun and should be treated with the same respect and precautions, and should be operated only by specially trained employees.

### **Safety precautions to remember include the following:**

- These tools should not be used in an explosive or flammable atmosphere
- Before using the tool, the worker should inspect it to determine that it is clean, that all moving parts operate freely, and that the barrel is free from obstructions
- Neither loaded nor unloaded tools should ever be pointed at anyone
- The tool should not be loaded unless it is to be used immediately. A loaded tool should never be left unattended where it would be available to unauthorized persons
- Hands should be kept clear of the barrel end. To prevent the tool from firing accidentally, two separate motions are required for firing:
  - » one to bring the tool into position
  - » another to pull the trigger
- The tools must not be able to operate until they are pressed against the work surface with a force of at least 5 pounds greater than the total weight of the tool

If a powder-actuated tool misfires, the operator should hold the tool in operating position for at least 30 seconds, and then try firing it again. If the tool still won't fire, the operator should hold the tool in operating position for another 30 seconds then proceed to carefully remove the explosive load in strict accordance with the manufacturer's instructions. The bad cartridge should be put in water.

Suitable eye and face protection are essential when using a powder-actuated tool.

The muzzle end of the tool must have a protective shield or guard centered perpendicularly on the barrel to confine any flying fragments or particles that might otherwise create a hazard when the tool is fired. The tool must be designed so that it will not fire unless it has this kind of safety device.

All powder-actuated tools must be designed for varying powder charges so that the user can select a powder level necessary to do the work without excessive force.

If the tool develops a defect during use it should be tagged and taken out of service immediately until it is properly inspected and repaired in accordance with the manufacturer's specifications.

## **Fasteners**

When using powder-actuated tools to apply fasteners, there are some precautions to be considered:

- Fasteners must not be fired into material that would let them pass completely through and creating a flying missile hazard on the other side
- The fastener must not be driven into materials like brick or concrete any closer than 3 inches to an edge or corner
- In steel, the fastener must not come any closer than one-half inch from a corner or edge. Fasteners must not be driven into very hard or brittle materials which might chip or splatter, or make the fastener ricochet
- An alignment guide must be used when shooting a fastener into an existing hole
- A fastener must not be driven into a palled area caused by an unsatisfactory fastening
- Tools shall not be used in an explosive or flammable atmosphere
- All tools shall be used with the correct shield, guard, or attachment recommended by the manufacturer
- Tools shall be inspected at regular intervals

## **Hydraulic Power Tools**

The fluid used in hydraulic power tools must be an approved fire-resistant fluid and must retain its operating characteristics at the most extreme temperatures to which it will be exposed.

The manufacturer's recommended safe operating pressure for hoses, valves, pipes, filters, and other fittings must not be exceeded.

## **Jacks**

All jacks (lever & ratchet jacks, screw jacks, and hydraulic jacks) must have a device that stops them from jacking up too high.

The manufacturer's load limit must be permanently marked in a prominent place on the jack and should not be exceeded.

A jack should never be used to support a lifted load. Once the load has been lifted, it must immediately be blocked up.

Use wooden blocking under the base if necessary to make the jack level and secure. If the lift surface is metal, place a 1-inch-thick hardwood block or equivalent between it and the metal jack head to reduce the danger of slippage.

To set up a jack, make certain of the following:

- the base rests on a firm level surface
- the jack is correctly centered
- the jack head bears against a level surface
- the lift force is applied evenly

Proper maintenance of jacks is essential for safety. All jacks must be inspected before each use and lubricated regularly. If a jack is subjected to an abnormal load or shock, it should be thoroughly examined by qualified persons to make sure it has not been damaged.

Hydraulic jacks that may be exposed to freezing temperatures must be filled with adequate antifreeze liquid.

## **General Safety Precautions**

Employees/operators who use hand and power tools and who are exposed to the hazards of falling, flying, abrasive and splashing objects, or exposed to harmful dusts, fumes, mists, vapors, or gases must be provided with the particular personal protective equipment necessary to protect them from the hazard.

All hazards involved in the use of power tools can be prevented by following five basic safety rules:

- Keep all tools in good condition with regular maintenance
- Use the right tool for the job
- Examine each tool for damage before use. If damaged take out of service and do not use
- Operate/use tools according to the manufacturer's instructions
- Provide and use the proper personal protective equipment

Employees and Management have a responsibility to work together to establish safe working procedures. Employees are to be trained on the proper use of equipment provided, the proper procedures to follow during use, proper protective equipment that is to be worn, and inspection practices to be followed and proper notification procedures to follow if equipment is deemed unsafe.

If a hazardous situation is encountered, it should be brought to the attention of supervision immediately.



## SECTION 25

# Process Safety Management



# Process Safety Management

## Introduction

This section is used to assist Paragon employees with understanding potential exposures when and where highly hazardous chemicals are present (a list is available through OSHA). While security officers' duties do not involve the handling, process or maintenance of these chemicals, officer exposure may be the result from the accidental release of those chemicals. Process Safety Management (PSM) applies to client locations where Paragon services are provided such as: oil refineries, chemical producers, and certain heavy industrial manufacturers (fabricated metal products). Other affected industries include natural gas liquids, farm product warehousing, electric, gas, and sanitary services, and wholesale trade. It also applies to pyrotechnics and explosives manufacturers.

Unexpected releases of toxic, reactive, or flammable liquids and gases in processes involving highly hazardous chemicals have been reported for many years. Incidents continue to occur in various industries that use highly hazardous chemicals which may be toxic, reactive, flammable, or explosive, or may exhibit a combination of these properties. Regardless of the industry that uses these highly hazardous chemicals, there is a potential for an accidental release any time they are not properly controlled. This, in turn, creates the possibility of disaster.

Historical major disasters include the 1984 Bhopal, India, incident resulting in more than 2,000 deaths; the October 1989 Phillips Petroleum Company, Pasadena, TX, incident resulting in 23 deaths and 132 injuries; the July 1990 BASF, Cincinnati, OH, incident resulting in 2 deaths; and the May 1991 IMC, Sterlington, LA, incident resulting in 8 deaths and 128 injuries.

## Regulations

The OSHA standard, 29CFR1910.119 - "Process Safety Management of Highly Hazardous Chemicals" - contains requirements for the management of hazards associated with processes using highly hazardous chemicals to help assure safe and healthful workplaces.

OSHA's standard emphasizes the management of hazards associated with highly hazardous chemicals and established a comprehensive management program that integrated technologies, procedures, and management practices. The PSM Standard is included in all federal and state OSHA programs.

In addition, the Clean Air Act Amendments (CAAA) required that per the PSM standard any site that has a process which involves a chemical at or above the specified threshold quantities of the chemicals to include a list of highly hazardous chemicals which includes toxic, flammable, highly reactive, and explosive substances. A copy of this list should also be obtained from the client as part of the Site Hazard Communications program.

The CAAA also specified minimum elements that the OSHA standard must require employers to do, as follows:

- Develop and maintain written safety information identifying workplace chemical and process hazards, equipment used in the processes, and technology used in the processes;
- Perform a workplace hazard assessment, including, as appropriate, identification of potential sources of accidental releases, identification of any previous release within the facility that had

a potential for catastrophic consequences in the workplace, estimation of workplace effects of a range of releases, and estimation of the health and safety effects of such a range on employees;

- Consult with employees and their representatives on the development and conduct of hazard assessments and the development of chemical accident prevention plans and provide access to these and other records required under the standard;
- Establish a system to respond to the workplace hazard assessment findings, which shall address prevention, mitigation, and emergency responses;
- Review periodically the workplace hazard assessment and response system;
- Develop and implement written operating procedures for the chemical processes, including procedures for each operating phase, operating limitations, and safety and health considerations;
- Provide written safety and operating information for employees and employee training in operating procedures, by emphasizing hazards and safe practices that must be developed and made available;
- Ensure contractors and contract employees are provided with appropriate information and training;
- Train and educate employees and contractors in emergency response procedures in a manner as comprehensive and effective as that required by the regulation.
- Establish a quality assurance program to ensure that initial process-related equipment, maintenance materials, and spare parts are fabricated and installed consistent with design specifications;
- Establish maintenance systems for critical process-related equipment, including written procedures, employee training, appropriate inspections, and testing of such equipment to ensure ongoing mechanical integrity;
- Conduct pre-startup safety reviews of all newly installed or modified equipment;
- Establish and implement written procedures managing change to process chemicals, technology, equipment, and procedures; and changes to facilities that affect a covered process
- Investigate every incident that results in or could have reasonably resulted in a major accident or catastrophic release of a highly hazardous chemical in the workplace within 48 hours, with any findings to be reviewed by affected operating personnel whose job tasks are relevant to the incident findings, and modifications and corrective actions made, if appropriate.

The key provision of PSM is process hazard analysis - a careful review of what could go wrong and what safeguards must be implemented to prevent releases of hazardous PSM and clarifies the responsibilities of employers and contractors involved in work that affects or takes place near covered processes to ensure that the safety of both plant and contractor employees is considered.

To understand PSM and its requirements, employers and employees need to understand how OSHA uses the term “process” in PSM. Process means any activity involving a highly hazardous chemical including any use, storage, manufacturing, handling, or on-site move of such chemicals or combination of these activities at the site. For purposes of this definition, any group of vessels that are interconnected and separate vessels located such that a highly hazardous chemical could be involved in a potential release shall be considered a single process.

## Process Safety Information

The compilation of written process safety information is to enable the employer and employees involved in operating the process to identify and understand the hazards posed by those processes involving highly hazardous chemicals. This process safety information shall include information pertaining to the hazards of the highly hazardous chemicals used or produced by the process, information pertaining to the technology of the process and information pertaining to the equipment in the process.

Information on the hazards of the highly hazardous chemicals in the process shall consist of at least the following:

- Toxicity,
- Permissible exposure limits,
- Physical data,
- Reactivity data,
- Corrosivity data,
- Thermal and chemical stability data, and
- Hazardous effects of inadvertent mixing of different materials.

## Operating Procedures

The employer/client shall develop and implement written operating procedures, consistent with the process safety information, that provide clear instructions for safely conducting activities involved in each covered process. OSHA believes that tasks and procedures related to the covered process must be appropriate, clear, consistent, and most importantly, well communicated to employees. The procedures shall address at least the following elements:

- Steps for each operating phase:
  - » Initial startup;
  - » Normal operations;
  - » Temporary operations;
- Emergency shutdown, including the conditions under which emergency shutdown is required, and the assignment of shutdown responsibility to qualified operators to ensure that emergency shutdown is executed in a safe and timely manner;
- Emergency operations;
  - » Normal shutdown; and
  - » Startup following a turnaround, or after an emergency shutdown.
- Operating limits:
  - » Consequences of deviation, and
  - » Steps required correcting or avoiding deviation.
  - » Safety and health considerations:
    - Properties of, and hazards presented by, the chemicals used in the process;
    - Precautions necessary to prevent exposure, including engineering controls, administrative controls, and personal protective equipment;

- Control measures to be taken if physical contact or airborne exposure occurs;
  - Quality control for raw materials and control of hazardous chemical inventory levels; and
  - Any special or unique hazards.
- » Safety systems (e.g., interlocks, detection or suppression systems) and their functions.

To ensure that a ready and up-to-date reference is available, and to form a foundation for needed employee training, operating procedures must be readily accessible to employees who work in or maintain a process. The operating procedures must be reviewed as often as necessary to ensure that they reflect current operating practices, including changes in process chemicals, technology, and equipment, and changes to facilities. The employer shall certify that these operating procedures are current and accurate on an annual basis.

The employer must develop and implement safe work practices to provide for the control of hazards during work operations such as:

- lockout/tagout per 29CFR1910.147;
- hot work permitting process per 29CFR1910.252(a);
- confined space entry per 29CFR1910.146;
- opening process equipment or piping; and
- control over entrance into a facility by maintenance, contractor, laboratory, or other support personnel.

These safe work practices must apply both to employees and to contractor employees.

## **Training**

### **Initial Training**

OSHA believes that the implementation of an effective training program is one of the most important steps that an employer can take to enhance employee safety. Accordingly, PSM requires that each employee presently involved in operating a process or a newly assigned process must be trained in an overview of the process and in its operating procedures. The hazardous communications portion of the training shall include all known workplace hazards and instructions in the avoidance and abatement of the hazards with emphasis on the specific safety and health hazards of the process, emergency operations including shutdown, and other safe work practices that apply to the employee's job tasks.

Safety Data Sheets (SDS) are to be used to convey process safety information and will be reviewed for every toxic or hazardous substance in the workplace the employees might potentially be exposed to.

### **Refresher Training**

Refresher training must be provided at least every 3 years, or more often if necessary, to each employee involved in operating a process to ensure that the employee understands and adheres to the current operating procedures of the process.

## Training Documentation

The employer must determine whether each employee operating a process has received and understood the training required by PSM. A record must be kept containing the identity of the employee, the date of training, the identity of the trainer, and how the employer verified that the employee understood the training.

## Contractors

Many categories of contract labor (as companies such as Paragon) may be present at a jobsite or adjacent to a covered process; such employees may actually operate within the facility. PSM includes special provisions for contractors and their employees to emphasize the importance of everyone taking care that they do nothing to endanger those working nearby who may work for another employer.

This Standard does not apply to contractors providing incidental services which do not influence process safety e.g. janitorial work, food and drink services, laundry, delivery or other supply services.

## Client Responsibilities

The client must obtain and evaluate information regarding the contract employer's safety performance and programs. The client also must:

- inform the company of the known potential fire, explosion, or toxic release hazards related to the contractor's work and the process;
- explain to contract employers the applicable provisions of the Emergency Action Plan;
- develop and implement safe work practices to control the presence, entrance, and exit of contract employers and contract employees in covered process areas;
- evaluate periodically the performance of contract employers in fulfilling their obligations; and
- maintain a contract employee injury and illness log related to the contractor's work in the process areas.

## Company Responsibilities

The company must:

- Train employees in the work practices necessary to perform their job safely;
- Instruct employees in the known potential fire, explosion, or toxic release hazards related to their job and the process, and in the applicable provisions of the Emergency Action Plan;
- Document that each employee has received and understood the training required by the standard by preparing a record that contains the identity of the contract employee, the date of training, and the means used to verify that the employee understood the training;
- Ensure that each employee follows the safety rules of the facility including the required safe work practices required in the operating procedures section of the standard; and
- Prior to starting work at a client facility, Paragon management shall perform a job hazard analysis (JHA) of the worksite. Upon completion of the JHA Paragon shall make the client

aware of any hazards identified and any unique hazards that may be present that may affect work being performed by its employees at the site or that may present a hazard while work is being performed.

## Incident Investigation

A crucial part of the process safety management program is a thorough investigation as promptly as possible within 48 hours of incidents to identify the chain of events, results, and causes so that corrective measures can be developed and implemented. Accordingly, PSM requires the investigation of each incident that resulted in a major accident, or could reasonably have resulted in, a catastrophic release of a highly hazardous chemical in the workplace. It is the client's responsibility to perform the incident investigation and share the results with the company. Paragon will participate and assist in all incident investigations that involve its employees. The report shall be prepared at the conclusion of the investigation and include the investigation dates, description of the incident, findings/contributing factors, resolution, and corrective actions. Investigation reports are to be retained/maintained for 5 years.

## Trade Secrets

The Client shall make all necessary information available for compiling the process safety analysis and the development of the operating procedures, emergency planning and response without regard to possible trade secret status of such information.

Employees are to be instructed in the confidentiality of trade secret information, and the disciplinary actions/consequences of violation of confidentiality.

## Management of Change

The client shall establish and implement written procedures to manage changes (except for "replacements in kind") to process chemicals, technology, equipment, and procedures, and changes to facilities that affect a covered process.

The procedures shall assure that the following considerations are addressed prior to any change:

- Technical basis for the proposed change
- Impact of change on safety and health
- Modifications to operation procedures
- Necessary time period for the change, and
- Authorization requirements for the proposed change

Changes in process safety information or operating procedures or practices shall be updated accordingly. And employees whose job tasks will be affected by change in the operating process shall be informed and trained in the change prior to start-up of the process or affected part of the process.



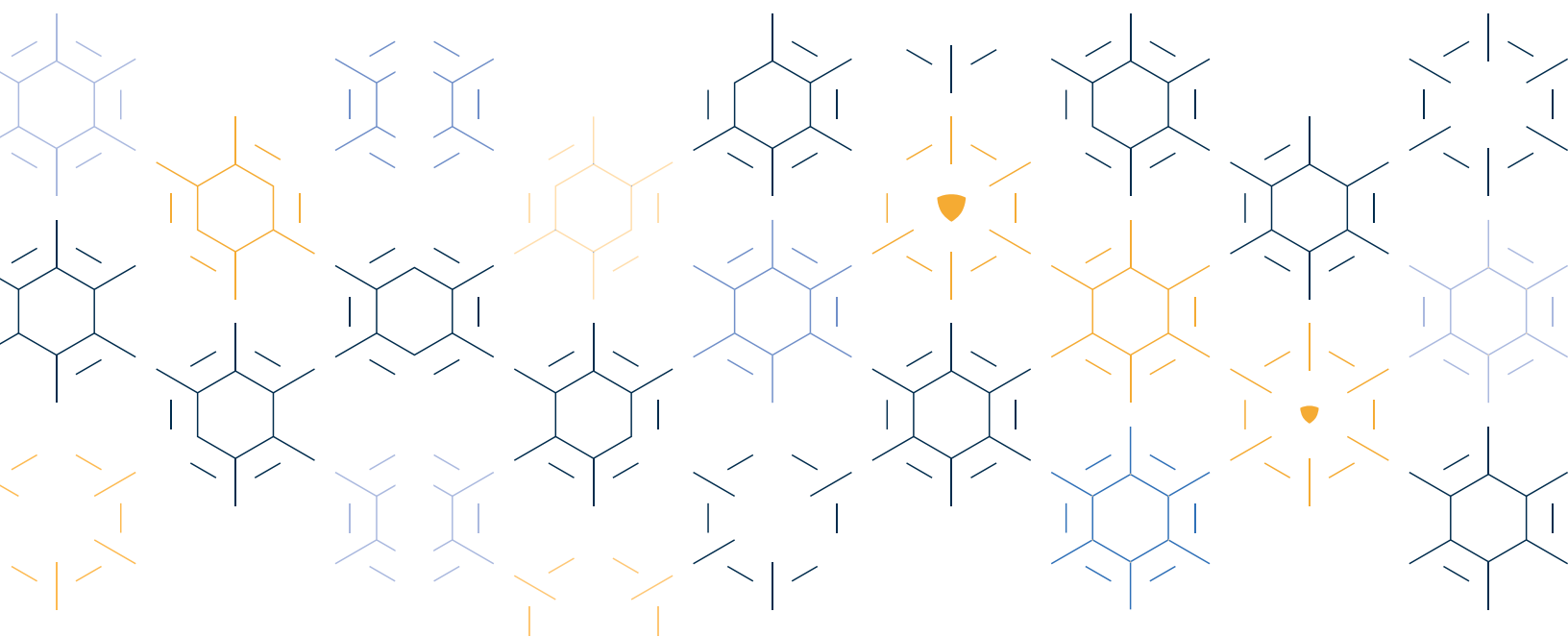
## Emergency Planning and Response

The employer/client shall establish and implement an Emergency Action Plan for the entire plant per 29CFR1910.38(a). The Emergency Action Plan shall include procedures for handling small releases. Employers covered under the PSM standard may also be subject to the Hazardous Waste Operations and Emergency Response (HAZWOPER) standard 29CFR1910.120(a), (p), & (q).

## Compliance Audits

To be certain process safety management is effective, employers must certify that they have evaluated compliance with the provisions of PSM at least every 3 years to verify that the procedures and practices developed under the standard are adequate and are being followed.

The compliance audit must be conducted by at least one person knowledgeable in the process and a report of the findings of the audit must be developed and documented noting deficiencies that have been corrected. The two most recent compliance audit reports must be kept on file.





25A

PROCESS SAFETY MANAGEMENT TRAINING

ACKNOWLEDGEMENT

PARAGON

I acknowledge that I have received information and training on the Process Safety Management Program related to the process overview, specific safety and health hazards, procedures and safe practices applicable to assigned roles and responsibilities while working at a site with acutely hazardous materials as required per Federal OSHA Regulations CFR 1910.119, and Cal OSHA Title 8 Regulation CCR 1589.

Employee Name (Print)

Date

Employee Signature

Instructor/Trainer Name

cc: Personnel File



## SECTION 26

# Respiratory Protection Program

# Respiratory Protection Program

## Introduction

In any workplace where respirators are necessary to protect the health of workers or whenever respirators are required by an employer, the employer shall establish and implement a written respiratory protection program with worksite procedures. While the majority of the work at Paragon does not require use of a respiratory protection device it is important to recognize there are different types of respirators designated for specific environmental conditions and what those conditions are. Federal OSHA standard 29CFR1910.134, Respiratory Protection, sets the requirements for the use of respiratory devices in the workplace. Many state plans also have similar regulations or have adopted the federal regulation, especially as related to fire fighters.

Paragon has adopted and maintains a Respiratory Protection Program for the selection, inspection, safe use, maintenance, and training for the use of respiratory protection equipment.

Immediate action is required should an employee request a safety check on a respirator or request repair or replacement. Failure to do so may result in an injury to the employee and serious liability for the company.

## Responsibilities

It is the responsibility of the Program Manager and Field Supervisors to meet with the Client to determine if respiratory protection will need to be worn by Paragon officers while performing their assigned duties, during a release, or during emergency response to certain areas within the client's facility. If respirators are required, the Client is to identify who the site's Program Administrator is and supply Paragon with a copy of the site's written Respiratory Protection Program (An example of a written Respiratory Protection Program Template is provided in Section 26(a) of the Paragon Safety Manual). If determined respiratory protection will be needed for officers, the Program Manager and Field Supervisors are to have respirators available to employees where an exposure exists, to ascertain that type of respiratory equipment is being used, and to counsel employees on the proper inspection, donning and doffing procedures, proper use, and consequences regarding failure to use equipment. It shall be the responsibility of all personnel whose job duties shall or may require the use of air purifying or self-contained breathing apparatus to know and comply with this policy. The Client shall be the Program Administrator and shall have the authority and responsibility for the overall management and administration of this program, which consists of the following:

- Preparing, evaluating and modifying the written Respiratory Protection Program as needed.
- Identifying, locating and maintaining ongoing surveillance and evaluation of airborne exposures
- Evaluation and selection of respirators
- Conducting medical screening for potential respirator users, specifically firefighters
- Conducting respirator fit testing and assignment
- Establishing procedures for proper use of respirators, and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding and maintaining respirators
- Conducting ongoing training

- Maintaining complete and accurate records of all testing and evaluations
- Annual fit testing of all respirators and recurrent training on proper usage

In coordination with the Site Program Administrator, the Program Manager and Field Supervisors will verify the officers will be medically evaluated to determine if officers are fit to wear respiratory protection; that the officers are properly fit tested for all the types of respiratory protection that will be worn; that officer received documented training on proper inspection, donning and doffing, and inspection & maintenance of respirators and SCBA units, the proper use of respirators and what atmospheres that they can be safely used in; and that officers receive annual medical reevaluation and training on the respiratory protection.

The employer shall provide respirators, training, and medical evaluations at no cost to the employees.

## **Monitoring**

The Respiratory Protection Program requires periodic review, as well as suggestions and comments from employees regarding exposure conditions, respirators, personal health changes and training.

It is the responsibility of the site supervisor or Program Manager to perform an exposure assessment to identify any harmful airborne contaminants, their extent and magnitude and how to control them. The supervisor shall ensure that employee exposure does not exceed the permissible concentration specified in OSHA Subpart 1 of 29 CFR 1910.134.

## **Equipment**

In instances where engineering and administrative means cannot achieve the desired control of airborne contaminants, or in the event of an emergency situation, respirators must be worn. Different types of respirators are available for a variety of applications. The Site Supervisor or Program Manager shall ensure that the proper NIOSH/MSHA approved respirators (air purifying, powered air purifying, supplied air, airline respirators, or self-contained breathing apparatus) are selected and used for the type of work performed and appropriate for the chemical state (gases and vapors) and physical form of contaminant or Immediately Dangerous to Life or Health (IDLH) hazardous atmospheres that may be encountered in the workplace.

## **Evaluation of Respirator Wearer Health Status**

Even with appropriate equipment and adequate training, an employee's health status must be considered before allowing use of a respirator. Respirator use may place a physiological burden on employees which varies with the type of respirator worn, the job and workplace conditions in which the respirator is used, and the medical status of the employee. Therefore a medical evaluation must be conducted to determine the employee's physical ability to use a respirator. A physician or licensed health care provider (PLHCP) shall be identified to perform the medical evaluations using a medical questionnaire or an initial medical examination that obtains the same information as the medical questionnaire. Appendix "C"- Respirator Medical Evaluation Questionnaire (Mandatory) of the OSHA Respiratory Standard is to be used as part of the evaluation. This evaluation is to be conducted prior to initial fit testing and annually prior to the employee annual fit testing process. If an employee indicates a positive response to questions 1-8, a follow-up medical examination is needed. Employees will not be

permitted to wear respirators until a PLHCP indicates that the employee is medically able to do so. Any employee refusing a medical evaluation cannot work in an area requiring respirator use.

Additional employee medical evaluation or medical re-evaluation is to be conducted when:

- An employee reports medical signs of symptoms that are related to the employee's ability to use a respirator, or indicates a change in medical condition on the required annual medical evaluation questionnaire
- The PLHCP, Supervisor, or Respirator Program Administrator observes the employee is having a medical problem during fit testing or workplace respirator use
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation
- Changes occur in the workplace conditions (e.g. physical work effort, type of respirator used, protective clothing, or temperature) that may result in a substantial increase in the physiological burden placed on an employee

The content of such additional medical evaluations will be determined by the PLHCP.

Documentation shall be obtained and on file from the PLHCP that the employee's evaluation has determined that the employee is physically able to wear respiratory protection before initial and/or annual fit testing procedures are conducted.

Fire suppression, hazardous material responses or work with lead, asbestos, dust and certain cancer causing agents make this evaluation mandatory.

## Fit Testing

Before an employee can wear any respirator with a negative or positive pressure tight-fitting face piece, the employee must be fit tested with the same make, model, style, and size of respirator that will be used. The initial test shall be conducted using either a qualitative fit test (QLFT) or quantitative fit test (QNFT), and designated procedures for conducting the fit test as specified by Appendix "A" of the OSHA Respiratory Standard OSHA CFR 1910.134, and the employee must pass the tests prior to being permitted to use respiratory protection. Fit testing shall also be conducted whenever a different respirator face piece is used and at least annually thereafter. Additional fit testing is to be conducted whenever visual observations of changes to the employee's physical condition could affect the respirator fit, e.g. facial scarring, dental changes, cosmetic surgery, or an obvious change in body weight.

Written records documenting the fit testing must be kept on file. These records should include but not be limited to:

- Date tested
- Type of fit testing conducted (QLFT or QNFT)
- Name of the employee tested
- Specific make and model of the face pieces tested
- Pass/fail results of the tests

## Training

It is the responsibility of the Site Supervisor to ensure that employees are thoroughly trained in the need, use, limitations, inspection, fit checks and maintenance of any necessary respiratory equipment.

Initial training should be done as part of basic training.

Annual training should encompass but not be limited to:

- Safely donning and doffing respiratory protection equipment
- Uses and limitations of respiratory protection equipment
- Consequences of an improper fit or the impact of poor maintenance
- How to perform seal tests
- How to recognize medical signs and symptoms that can impact use of equipment
- How to inspect the respirator before use
- Procedures for maintenance and storage
- Approved decontamination and disposal procedures for respiratory protection equipment
- In the event any of the following situations occur retraining should take place immediately:
- Changes in the hazards found in the workplace or the type of respirator in use by the jurisdiction render the 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
- Any other situation arises in which retraining appears necessary to ensure safe respirator use

During the annual fit test and training, detailed instructions for the care and use of the respirators provided by the manufacturer will be reviewed by all officers.

## Documentation

It is the responsibility of the Site Supervisor to verify by documentation that each component for the Respiratory Protection Plan has been met. This documentation should include:

- Exposure Determination
- Respirator selection
- Medical evaluation results
- Fit Testing Results

All documentation is to be kept on file.



## Negative and Positive Pressure Respirators

Respirators shall not be worn when an employee has any conditions that prevent a good face seal. This shall include but not be limited to:

- Beard or facial hair at any point where the face piece is designed to seal with the face  
*Note: A 24 hour growth is considered to be a beard by OSHA. Therefore officers are to remain clean shaven in areas of the mask seal surface.*
- Eye glasses with a strap or temple bars that pass through the face piece to face seal area
- Any head covering, including helmets and hazardous chemical protection hoods, that passes between the sealing surface of the respiratory protection face piece and the face

## Self-Contained Breathing Apparatus and Supplied Air Respirator

- It is the policy of Paragon that all personnel expected to respond and function in areas of atmospheric contamination or IDLH conditions shall be equipped with NIOSH approved Self-Contained Breathing Apparatus (SCBA) or Supplied Air Respirator (SAR) and trained in the proper use and maintenance of the unit and unit components.
- No self-contained breathing apparatus that has been found in any way defective shall be used on an incident or in any dangerous or potentially dangerous atmosphere. If no replacement is available during an incident, the employee shall assume duties in an area that has been determined to not have any potential for exposure to dangerous atmospheres.
- Only compressed breathing air cylinders tested and maintained in accordance to NIOSH standards are to be used. All compressed air cylinders that provide breathing air to SCBAs or to SARs shall meet the requirements for Grade D breathing air described in ANSI G-7.1 to include Oxygen content of 19.5-23.5%, hydrocarbon content of 5mg/m<sup>3</sup> or less, CO content of 10 ppm or less, CO<sub>2</sub> content of less than 1000 ppm, and lack of noticeable odor.

## Firefighter Specific

All personnel assigned fire suppression roles and responsibilities shall be evaluated annually to determine their fitness to wear self-contained breathing apparatus or other forms of respiratory protection. Before a firefighter is fit tested for a respirator a medical evaluation shall be completed and documentation should be placed in the employee's file. Medical evaluations shall be conducted in accordance with NFPA 1582, Standard Comprehensive Occupational Medical Program for Fire Departments.

## Employee Use of Respirators When Not Required

Where a respirator is not required, employees may be permitted to use their own respirators provided the use of a respirator will not in itself create a hazard. If determined that voluntary respirator use is permissible, officers shall be provided with a copy of the Respiratory Protection Standard Appendix "D" – Information for Employees Using Respirators When Not Required Under The Standard (Mandatory).



# 26A Respiratory Protection Program Template

## Preface:

The basic purpose of a respirator is to protect the user from inhalation of hazardous atmospheres. When it is determined that a hazardous atmosphere exists, the first line of defense is to eliminate the hazard using engineering controls (i.e., ventilation). However, if engineering controls are infeasible because of technical or financial constraints, then respirators must be used to protect workers. Additionally, respirators must be used when airborne contaminant sources cannot be controlled to a level below their occupational exposure limits (e.g., certain maintenance and repair operations, emergencies, or during periods when ventilation system controls are being installed). Where hazardous atmospheres have been identified at a Client's site, Paragon employees are to follow the site's respiratory protection program. If no site respiratory protection program is in place, this template is to be used to establish a respiratory program for Paragon officers.

There are many variables that affect the degree of protection provided by respirators and the misuse of respirators can be hazardous to employee safety and health. Selection of the wrong equipment, one of the most frequent errors made in respiratory protection, can result in the employee being exposed to increased concentrations of the harmful contaminant. Respirators that are not maintained and inspected can be less effective at reducing exposure to harmful contaminants and can place a greater physical burden on the respiratory system. Respirators that are not clean can cause skin irritation or dermatitis. This program establishes standard operating procedures to ensure that respirators are selected, used, and maintained properly, and the potential hazards associated with misuse are eliminated.

## Purpose:

The potential for employee exposure to respiratory hazards as identified by the (client name) exists during the performance of specific job duties. The purpose of this program is to ensure that all Paragon employees are protected from exposure to respiratory hazards while working at the (facility name). Controls such as ventilation and substitution of less toxic materials are the first line of defense. However, these controls are not always feasible for some operations, or they will not always completely control identified hazards. In these situations, respirators and other protective equipment must be used. Respirators are also utilized for protection during foreseeable emergencies.

## Scope and Application:

### Mandatory use of Respirators

This program applies to all Paragon employees who are required to wear respirators during normal work operations and during certain non-routine or emergency operations. The requirement to wear a respirator is determined based on the employee's potential exposure to respiratory hazards.

Paragon employees participating in the respiratory protection program do so at no cost to them. The expense associated with medical evaluations, training, and respiratory protection equipment will be borne by Paragon.

## **Voluntary use of Respirators**

Paragon employees who voluntarily choose to use a respirator when it is not required are subject to the cleaning, maintenance and storage elements of this program. These requirements can be met by following the respirator manufacturer's instructions for the selected respirator(s). Voluntary respirator users must also submit a respirator program request form and a medical questionnaire for approval. In addition, the information specified in the OSHA Respiratory Protection Standard Appendix A: "Important Information about Voluntary Use of Respirators" will be provided to all voluntary users of respirators.

Paragon employees who voluntarily use filtering face-piece respirators (i.e., dust masks) are excluded from all requirements of this program except that they must be provided with the information outlined within Appendix A.

## **Procedure:**

### **Responsibilities**

#### *Respirator Program Administrator*

The Respirator Program Administrator is responsible for overseeing the respiratory protection program and ensuring that all requirements are fully implemented. The designated (client's name) Program Administrator is (Administrator Name).

#### *Other Responsible Individuals*

The Program Administrator has the authority to assign responsibility and accountability to employees or supervisors for each phase of the site's respiratory protection program.

### **Respiratory Hazard Evaluation**

A respiratory hazard evaluation for each operation, process, or work area should have been conducted, including employee exposure monitoring. The (client's name) supervision must report changes in work processes that may result in increased exposure to individuals working at the site. Such conditions may include the use of new chemicals; a change in the way chemicals are processed, handled, or manipulated; or a change in environmental controls such as local or general ventilation systems. The following sample hazard evaluation table summarizes the potential for employee exposure (be sure to include foreseeable emergencies if applicable):

Top of Form

Task / Job	Work Area/Location	Potential Respiratory Hazards	Employee Overexposure to Hazardous Chemicals? *	
			Yes	No
			Yes	No

\* Insert “Yes” in this column if employee exposure monitoring has been conducted, and the results of monitoring indicate that employee exposure exceeded applicable standards or guidelines.

Paragon employees who believe that respiratory protection is needed during a particular activity should contact their Supervisor. This information will be conveyed to the Site’s Program Administrator, who will ensure that the potential hazard is assessed, and the results of the assessment are communicated to the affected Paragon and site employees. If it is determined that respiratory protection is necessary, the hazard evaluation table is to be updated accordingly.

## **Respirator Selection**

### *Basis for Respirator Selection*

Respirators have been selected on the basis of the hazards to which the employees are exposed. Guidance for respirator selection was obtained by reviewing the OSHA Technical Manual, Section VIII, Chapter 2.V. “Respirator Selection”. All respirators must be certified by the National Institute for Occupational Safety and Health (NIOSH) and shall be used in accordance with the terms of that certification. All filters, cartridges, and canisters must be labeled with the appropriate NIOSH certification number. The label must not be removed or defaced while it is in use.

### *Workplace and User Factors*

Potential workplace and user factors that could influence the selection of respirator types must also be considered. Workplace and user factors include, but are not limited to, the equipment or tools that will be used; excessive temperature or relative humidity; or any motion or travel required which can interfere with the type of respirator to be selected. The following table summarizes the (site’s name) selected respirator types, the jobs or tasks that require the use of the respirator, the locations in which the respirators will be used; and specific workplace and user factors:

Type of Respirator	Jobs/Tasks Requiring Respirator Usage	Work Area/Location	Workplace and User Factors

A listing of currently approved list of Particulate respirators certified under 42 CFR Part 84 can be reviewed in the references.

## **Respirator Use**

### *Face-piece Seal Protection*

The use of respirators under conditions that would compromise the face-piece-to-face seal will not be permitted. Examples of these conditions include facial hair that interferes with the face-piece seal or valve function (e.g. a 24-hour growth is considered a beard/facial hair), absence of normally worn dentures, facial deformities (e.g., scars, deep skin creases, prominent cheekbones), or the use of

jewelry or headgear that projects under the face-piece seal. Fit testing cannot be conducted if any of these conditions exists. Additionally, corrective glasses or goggles, or other personal protective equipment, must be worn in such a way that they do not interfere with the seal of the face-piece to the face. If a Paragon employee is required to wear respiratory protection and must wear corrective glasses to be able to see, special glasses that have been approved while wearing respiratory protection will be provided.

### **Workplace Observations**

The guidance and oversight of the proper use of respirators is the responsibility of the direct supervisor, who will ensure that employees wear respirators when required, and that respirators are used correctly.

### **Change Schedule for Cartridges**

#### *Cartridges*

The manufacture's schedule and criteria for cartridge replacement should be followed. The following table outlines the change schedule for cartridges used in the various departments or work areas. The change schedules listed should be derived from actual use or established using the cartridge manufacturer's recommendations:

<b>Cartridge Manufacturer</b>	<b>Cartridge Model Number</b>	<b>Area of Use</b>	<b>Maximum Employee Exposure</b>	<b>Maximum Allowable Service Life (Hours)</b>

#### *Filters*

For respirators worn exclusively for protection against particles, filters will be changed according to the manufacturer's specification and whenever the wearer detects an increase in breathing resistance. It is the responsibility of (insert name of the client's program administrator or area supervisor or job title) to ensure that the change schedule is complete and updated as necessary.

### **Fit Testing**

Fit testing will be required for all Paragon employees who are required to wear respirators with a tight-fitting face-piece. Fit testing will be performed:

- After an employee has completed their medical evaluation and prior to being allowed to wear any respirator with a tight-fitting face-piece in the work environment.
- Whenever a different respirator face-piece is used.
- At least annually thereafter.
- 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.)

Paragon employees will be provided with the different models and sizes of respirators that have been approved by (client's site name) so that they may find the optimal fit. Officers shall be trained on the proper donning techniques for each respirator type chosen prior to fit testing to ensure the best seal will be achieved. Employees who voluntarily choose to use respirators in the absence of any atmospheric hazards are not required to be fit tested.

## **Medical Evaluation**

### *Initial Medical Evaluation*

Paragon employees that will be required to use respirators must be able to tolerate the physical and psychological stress imposed by respirator use. Employees will not be allowed to wear respirators until a Physician or other Licensed Health Care Professional (PLHCP) has determined that they are medically able to do so. Any employee refusing the medical evaluation cannot work in an area requiring respirator use.

If approved as a type of respirator that may be worn at the client's site, a powered air-purifying respirator (PAPR) will be provided to any employee if information from the PLHCP indicates that the employee can use a PAPR but not a negative pressure respirator. If, subsequent to this evaluation, the PLHCP determines that the employee is able to wear a negative pressure respirator, the supervisor will no longer be required to provide a PAPR to that employee.

## **Additional Medical Evaluations**

Additional medical evaluation or medical re-evaluation for any employee when:

- The employee reports medical signs or symptoms that are related to the employee's ability to use a respirator or indicates a change in medical conditions on the required annual medical evaluation questionnaire.
- The PLHCP, supervisor, or the respirator program administrator observes that the employee is having a medical problem during fit testing or workplace respirator use.
- Information from the respiratory protection program, including observations made during fit testing and program evaluation, indicates a need for employee re-evaluation.
- A change occurs in workplace conditions (e.g., physical work effort, type of respirator used, protective clothing, or temperature) that may result in a substantial increase in the physiological burden placed on an employee.

The content of such additional medical evaluations will be determined by the PLHCP.

## **Maintenance and Care**

### *Cleaning and Disinfection*

Respirators will be cleaned and disinfected by the users following the manufacturer's recommendations for each respirator.

### *The Frequency of Cleaning and Disinfecting:*

- Respirators that are issued for the exclusive use of an employee will be cleaned and disinfected as often as necessary to be maintained in a sanitary condition. Employees will be responsible to clean and disinfect respirators issued for their exclusive use.
- Respirators used by more than one employee will be cleaned after each use and should be disinfected prior to being used.
- Respirators maintained for emergency use will be cleaned and disinfected after each use.

### **Storage**

Respirators will be stored so that they are protected against damage, contamination, dust, sunlight, temperature extremes, excessive moisture, and damaging chemicals e.g.: in sealable plastic storage bags or storage cabinets. The Site's Program Administrator is responsible to ensure that respirators intended for emergency use will be kept accessible to the work area. Emergency use respirators will not be kept in any area that might itself be involved in the emergency because such an area may become contaminated or inaccessible. Emergency use respirators will be stored in compartments or covers that are clearly marked to indicate that they contain emergency respirators and stored according to any applicable manufacturer instructions.

Emergency respirators will be readily available for use and will be stored in compartments labeled "FOR EMERGENCY USE ONLY".

### **Inspection**

Respirators used in routine situations will be inspected before each use and during cleaning.

Respirator inspections will be conducted in accordance to the manufacturer's recommendations.

Respirators designated for use in an emergency situation will be inspected at least monthly and in accordance with the manufacturer's instructions and checked for proper function before and after each use. Emergency escape-only respirators must be inspected before being carried into the workplace. Self-contained breathing apparatus (SCBA) will be inspected monthly and after each use. Respirators that are maintained for use in emergencies will be certified by documenting the date that the inspection was performed, the name or signature of the inspector, the findings of the inspection, any required remedial action, and a serial number or other means of identifying the inspected respirator. This information will be provided on the tag/label that is attached to the storage compartment for the respirator.

Inspection information for emergency respirators will be maintained until it is replaced following subsequent certification.

### **Repair**

Supervisors will ensure that respirators, which fail to pass inspection or are otherwise found to be defective will be removed from service and repaired or adjusted properly. If a respirator cannot be repaired or adjusted, it will be discarded.

Repairs or adjustments to respirators will be initiated by the Program Administrator. Only NIOSH-

approved manufacturer's replacement parts designed for that respirator will be used. Repairs will be made in accordance with the manufacturer's recommendations and specifications regarding the type and extent of repairs to be performed.

## **Breathing Air Quality**

The Program Administrator will ensure that breathing air for atmosphere-supplying respirators used for Self-Contained Breathing Apparatus (SCBA) or Supplied Air Respirator (SAR) units will be of high purity, meets quality levels for content, and does not exceed the contaminant levels and moisture requirements as specified in ANSI G-7.1.

## **Cylinders**

Only Grade D breathing air shall be used in cylinders of supplied air respirators. The Program Administrator or designee will coordinate deliveries of compressed air with (vendor's name) and require certification that the air in the cylinders meets the specifications of Grade D breathing air. Moisture content in the cylinders will not exceed a dew point of  $-50^{\circ}\text{F}$  ( $-45.6^{\circ}\text{C}$ ) at 1 atmosphere pressure.

Note: This requirement will prevent respirator valves from freezing, which can occur when excess moisture accumulates on the valves. All breathing gas containers must be marked in accordance with the NIOSH respirator certification standard, 42 CFR Part 84.

The Program Administrator will maintain a minimum air supply of one fully charged replacement cylinder for each SAR unit.

## **Compressors**

Compressors used for supplying breathing air must be constructed and situated so contaminated air cannot enter the air-supply system. The location of the air intake will be in an uncontaminated area where exhaust gases from nearby vehicles, the internal combustion engine that is powering the compressor itself (if applicable), or other exhaust contaminants being ventilated will not be picked up by the compressor air intake.

Compressors will be equipped with suitable in-line, air-purifying sorbent beds and filters to further ensure breathing air quality and to minimize moisture content so that the dew point at 1 atmosphere pressure is  $10^{\circ}\text{F}$  ( $5.56^{\circ}\text{C}$ ) below the ambient temperature. Sorbent beds and filters will be maintained and replaced or refurbished periodically according to the manufacturer's recommendations. An inspection tag will be kept at the compressor indicating the most recent change date and the signature of the Program Administrator or designee authorized to perform the maintenance.

Only non-oil-lubricated compressors will be used.

The Program Administrator will ensure that the compressor intake will not allow the introduction of carbon monoxide greater than 10 parts per million (ppm) into the system.

*Note: This could be from sources other than the compressor such as forklifts/vehicles or other gas-powered equipment*



Breathing air couplings must be incompatible with outlets for non-respirable plant air or other gas systems to prevent accidental servicing of airline respirators with non-respirable gases or oxygen. No asphyxiating substance (e.g., nitrogen) will be allowed in the breathing airlines.

## **Training and Information**

The Company will provide documented general orientation training to respirator users before the fit testing session. The content of the general training program is to be outlined in “Training Outline for Respirator Use and Maintenance”

In addition to the general training session, site specific training will be conducted as needed. This training focuses on the specific practices and policies of the work areas where respiratory protection is required, including the contents of the written respiratory protection program and the employees’ responsibilities under it.

Paragon employees who voluntarily use filtering face-piece (dust mask) respirators are exempt from the training requirements. Employees who voluntarily use elastomeric air-purifying respirators will receive limited training regarding cleaning and storage.

The information specified in the OSHA Respiratory Protection Standard “Appendix A, Important Information about Voluntary Use of Respirators” will be provided all voluntary users of respirators

## **Program Evaluation**

The Site’s Program Administrator is responsible to conduct evaluations of the workplace, as necessary. Periodic program evaluation is required to ensure that the provisions of the respiratory protection program are being implemented for all employees using respirators. In addition, evaluations will be conducted to ensure the continued effectiveness of the program. Evaluations of the workplace will determine whether the correct respirators are being used and worn properly and will also serve to determine whether the training program is effective.

The Site’s Program Administrator is responsible to periodically monitor employee use of respirators to ensure that they are being used and worn properly.

In addition, the Site’s Program Administrator will regularly consult with employees wearing respirators to acquire the employees’ views on program effectiveness and to identify any problems so that corrective action can be taken.

The following factors will be evaluated to determine program effectiveness:

- Respirators are properly fitted and if employees are able to wear respirators without interfering with effective workplace performance.
- Respirators are correctly selected for the hazards encountered.
- Respirators are used properly depending on the workplace conditions encountered.
- Respirators are being maintained and stored properly.

The Site’s Program Administrator will be responsible to correct any problems associated with wearing a respirator that are identified by employees or that are revealed during any other part of this evaluation.

## **Recordkeeping**

### *Medical Records*

The Paragon District Office will retain a copy of the PLHCP's written recommendation for each Paragon employee subject to medical evaluation. Each employee's completed medical questionnaire, results of relevant medical tests, examinations, and diagnosis, etc., will be maintained by the PHLCP for a period of 30 years. Records of medical evaluations will be made available as specified in 29 CFR 1910.1020, "Access to Employee Exposure and Medical Records".

### *Fit Test Records*

The fit test records for respirator users shall be retained until the next fit test is administered. These records consist of:

- Name or identification of the employee tested
- Make, model, and size of the respirator fitted;
- Date of the fit test;
- Type of fit test method used
- Fit factor and other records of the test.

Additionally, each employee will retain fit testing results on a laminated card provided by the Department of Occupational Health and Safety.

### *Training Records*

The employee training records shall be retained at the Regional or District Office and a copy kept at the site that include the names of employees trained and the dates when training was conducted.

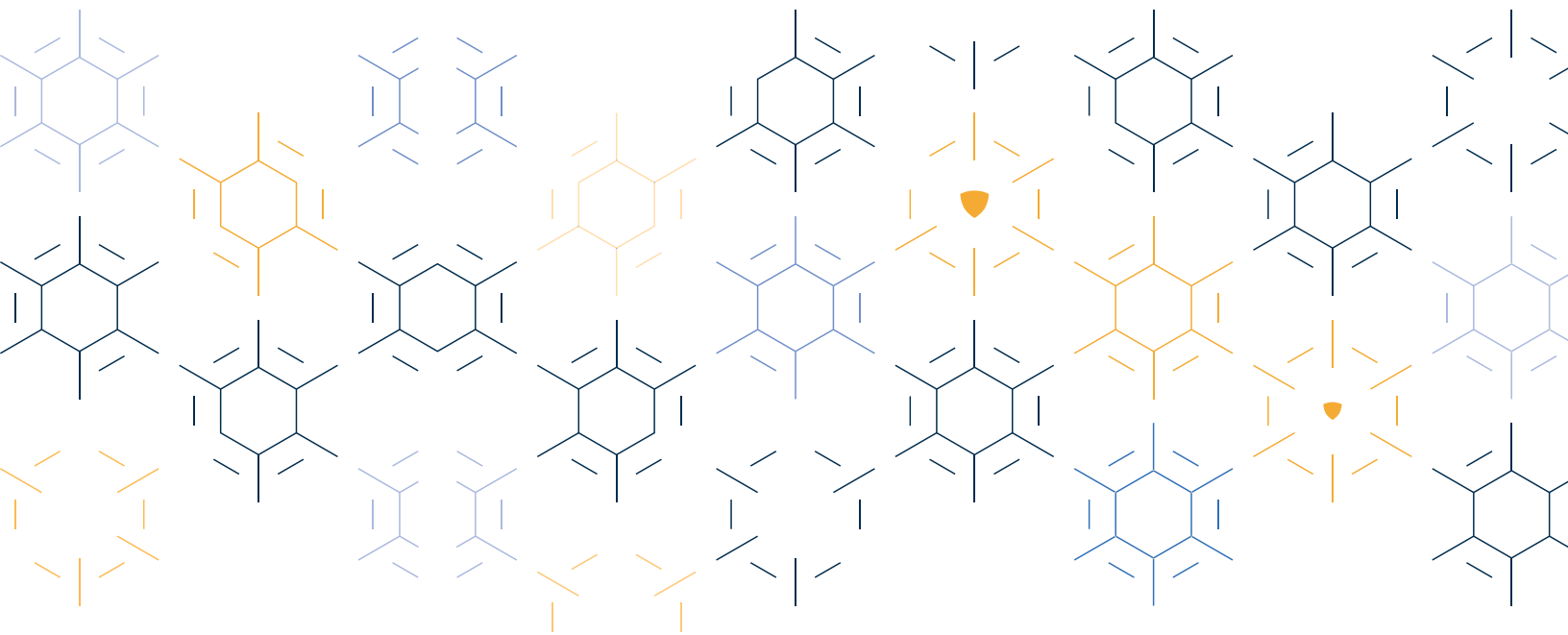
All written materials required to be maintained under the record keeping requirements will be made available, upon request to the employee who is subject to the records.

## **Important Information about Voluntary Use of Respirators**

Information for Paragon employees Using Respirators When Not Required Under the Standard Respirators are an effective method of protection against designated hazards when properly selected and worn. However, if a respirator is used improperly or not kept clean, the respirator itself can become a hazard to the worker. Sometimes, workers may wear respirators to avoid exposures to hazards, even if the amount of hazardous substance does not exceed the limits set by OSHA standards. If a Paragon employee provides their own respirator, the employee will need to take certain precautions to be sure that the respirator itself does not present a hazard.

Paragon employees voluntarily using respirators should do the following:

1. Read and follow all instructions provided by the manufacturer on use, maintenance, cleaning and care, and warnings regarding the respirator's limitations.
2. Choose respirators certified for use to protect against the contaminant of concern. NIOSH, the National Institute for Occupational Safety and Health of the U.S. Department of Health and Human Services, certifies respirators. A label or statement of certification should appear on the respirator or respirator packaging. The label will indicate what the respirator is designed for and how much protection it will provide to the wearer.
3. Respirator should not be worn into atmospheres containing contaminants for which the respirator is not designed to protect against. For example, a respirator designed to filter dust particles will not protect the wearer against gases, vapors, or very small solid particles of fumes or smoke.
4. Paragon Employees that are assigned respirators are to keep track of the respirator so that they do not mistakenly use someone else's respirator.



## 26B RESPIRATORY PROTECTION TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have been fit-tested and received information and training on the proper use, donning & doffing, care/maintenance, cleaning and/or disposal/replacement for the following types of respiratory protection (indicate names and types/models of respirators) as required per the Federal OSHA Regulation 29 CFR 1910.134 and Cal OSHA Title 8 Regulation CCR 5144.

I understand that I must be clean shaven in the area of seal whenever wearing respiratory protection. If for some reason I cannot wear respiratory protection as described herein (for example, for religious or health reasons I cannot be clean shaven), then I will report same to my human resources manager and Paragon shall accommodate me, which may include, among other things, being moved to an assignment that does not have the requirements set forth in this acknowledgement. Paragon has confirmed to me that I will not be subjected to discrimination or negative treatment based on religion, a health condition, or any other unlawful reason.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name

cc: Personnel File

## 26B.1 CALIFORNIA WILDFIRE RESPIRATORY PROTECTION TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the proper use, donning & doffing, care/maintenance, cleaning and/or disposal/replacement for the following types of respiratory protection (indicate names and types/models of respirators) as deemed permissible per the Cal OSHA Emergency Workforce Standard when smoke from wildfires reaches >151 on the Air Quality Index. I understand that I must be clean shaven in the area of seal and that I wear the provided respiratory protection on a voluntarily basis.

If for some reason I cannot wear a mask as described herein (for example, for religious or health reasons I cannot be clean shaven), then I will report same to my human resources manager and Paragon shall accommodate me, which may include, among other things, being moved to an assignment that does not have the requirements set forth in this acknowledgement. Paragon has confirmed to me that I will not be subjected to discrimination or negative treatment based on religion, a health condition, or any other unlawful reason.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name

cc: Personnel File



## SECTION 27

# Cold Weather Safety

# Cold Weather Safety

## Introduction

Cold weather and the risk of cold stress can be a major concern when Officers are either on remote outdoor posts, or making outdoor patrols on the exterior of client properties for extended periods during the cooler and winter months of the year. Being aware of the risk and symptoms of cold stress can help to prevent employee injury.

## Cold Stress

Cold stress can be encountered in these types of work environment; and extreme cold and its effects can vary across different areas of the country. 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 the body more rapidly.

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.

Some of the risk factors that contribute to cold stress are:

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

Some of the common cold induced illnesses/injuries are:

- Hypothermia
- Frostbite
- Trench Foot

## Hypothermia

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, and can be sped up if a person becomes chilled from rain or sweat.

- Mild Symptoms of hypothermia:
  - » An exposed worker is alert
  - » Worker may begin to shiver uncontrollably and stomp feet in an effort to generate heat. Although shivering indicates that the body is losing heat, it also helps the body to rewarm itself
- Moderate to Severe Symptoms of hypothermia:
  - » As the body temperature continues to fall, symptoms will worsen and shivering will stop
  - » The worker may lose coordination and fumble with items in the hand, become confused, disoriented, and may have slurred speech



- » The worker may be unable to walk or stand, pupils become dilated, skin will likely be pale or bluish in color and cold, pulse and breathing become slowed, and loss of consciousness can occur. A person could die if help is not received immediately

## Frostbite

Frostbite is an injury to the body that is caused by freezing of the skin and underlying tissues and loses water. Frostbite typically affects the extremities, particularly the feet and hands and can occur quickly with wind chill factors and lower temperatures. In severe cases, amputation of the frost bitten area may be required.

- Symptoms of frostbite:
  - » Reddened skin develops, then purple/bluish/pale waxy skin, gray/white patches in the fingers, toes, nose, cheeks, chin, or ear lobes
  - » Tingling, stinging, aching, a loss of feeling/numbness in the affected part of body
  - » Affected area feels firm or hard and cold to the touch
  - » In severe cases, blisters may occur in the affected part

### **Employees are to be trained on the following--Emergency first aid/actions to be taken if hypothermia or frostbite symptoms are detected:**

- Call 911 immediately in an emergency; otherwise alert supervision, request/seek medical assistance as soon as possible
- Move the person to a warm, dry area, room or shelter
- Remove wet clothes and replace with dry clothing, cover/wrap the entire 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
- If medical help is more than 30 minutes away
  - » If the person is alert, give warm sweetened drink (no alcohol), to help increase the body temperature. Never try to give a drink to an unconscious person
  - » Place warm bottles or hot packs in armpits, sides of chest, and groin. Call 911 for additional rewarming instructions
  - » If a person is not breathing or has no pulse basic life support may be necessary, **call 911 for emergency medical assistance immediately**, and co-workers trained in cardiopulmonary resuscitation (CPR) may help a person suffering from hypothermia until medical assistance arrives
- Additional Frostbite first aid/treatment:
  - » Unless absolutely necessary, **Do Not** walk on frostbitten feet or toes as it can increase the damage
  - » Protect the frost bitten area by wrapping/covering it loosely in a dry cloth and protecting the area from contact until medical help arrives
  - » **Do Not** rub the affected area to warm it because this action can cause more damage to skin and tissue
  - » **Do Not** apply snow or water

- » **Do Not** break blisters
- » **Do Not** try to rewarm the frostbitten area before getting medical help (e.g., do not use heating pads or place in warm water)\*
- \* It is safer for the frostbitten area to be rewarmed by medical professionals as more tissue damage will occur if a frostbitten area is rewarmed and gets frozen again

## Trench Foot

Trench foot or immersion foot is caused by prolonged exposure to wet and cold temperatures. Non-freezing injury occurs because wet feet lose heat 25-times faster than dry feet as the body constricts the blood vessels to shut down circulation in the feet to prevent heat loss.

- Trench foot symptoms:
  - » Redness of the skin
  - » Swelling
  - » Tingling or burning sensation
  - » Numbness
  - » Blisters or ulcers may be present
- Treatment for trench/immersion foot:
  - » Call 911 immediately in an emergency or seek medical assistance as soon as possible
  - » Remove the shoes, or boots, and wet socks
  - » Dry the feet and avoid working on them
  - » Keep affected feet elevated and avoid walking on them

## Prevention of Cold Stress

The OSHA General Duty Clause requires employers to provide workers with a place of employment which is free from recognized hazards which could cause or are likely to cause death or serious physical harm to workers therefore working in cold environments is covered.

Depending on the geographic area of the country, workers are to receive initial documented training regarding the health effects of cold exposure including and annual refresher training:

- How to recognize the environmental and workplace conditions that can lead to cold stress
- The symptoms of cold stress, how to prevent cold stress, and proper emergency actions to take to help/treat those who are affected
- How to select proper clothing/PPE for cold, wet, and windy conditions
- Monitoring co-workers physical condition and recognizing symptoms of cold stress

Employee's should be aware of forecast extreme cold weather conditions including the anticipated wind chill factor so that they can take precautions, and plan how to work safely during extremely hazardous winter conditions.

Where applicable, the provision of outer wear/protective clothing and gear is to be determined based on the climate conditions expected for the geographic area of the country and the type of work conditions and assignments that Officers will be assigned to.

## Warning Systems

The National Oceanic and Atmospheric Administration (NOAA) Weather Radio is a nationwide network of radio stations broadcasting continuous weather information from the nearest National Weather Service (NWS) office. These will give information when wind chill conditions reach critical thresholds. A Wind Chill Warning is issued when wind chill temperatures are life threatening. A Wind Chill Advisory is issued when wind chill temperatures are potentially hazardous. Below are the Winter Weather Terms used as the different hazardous weather conditions that may develop:

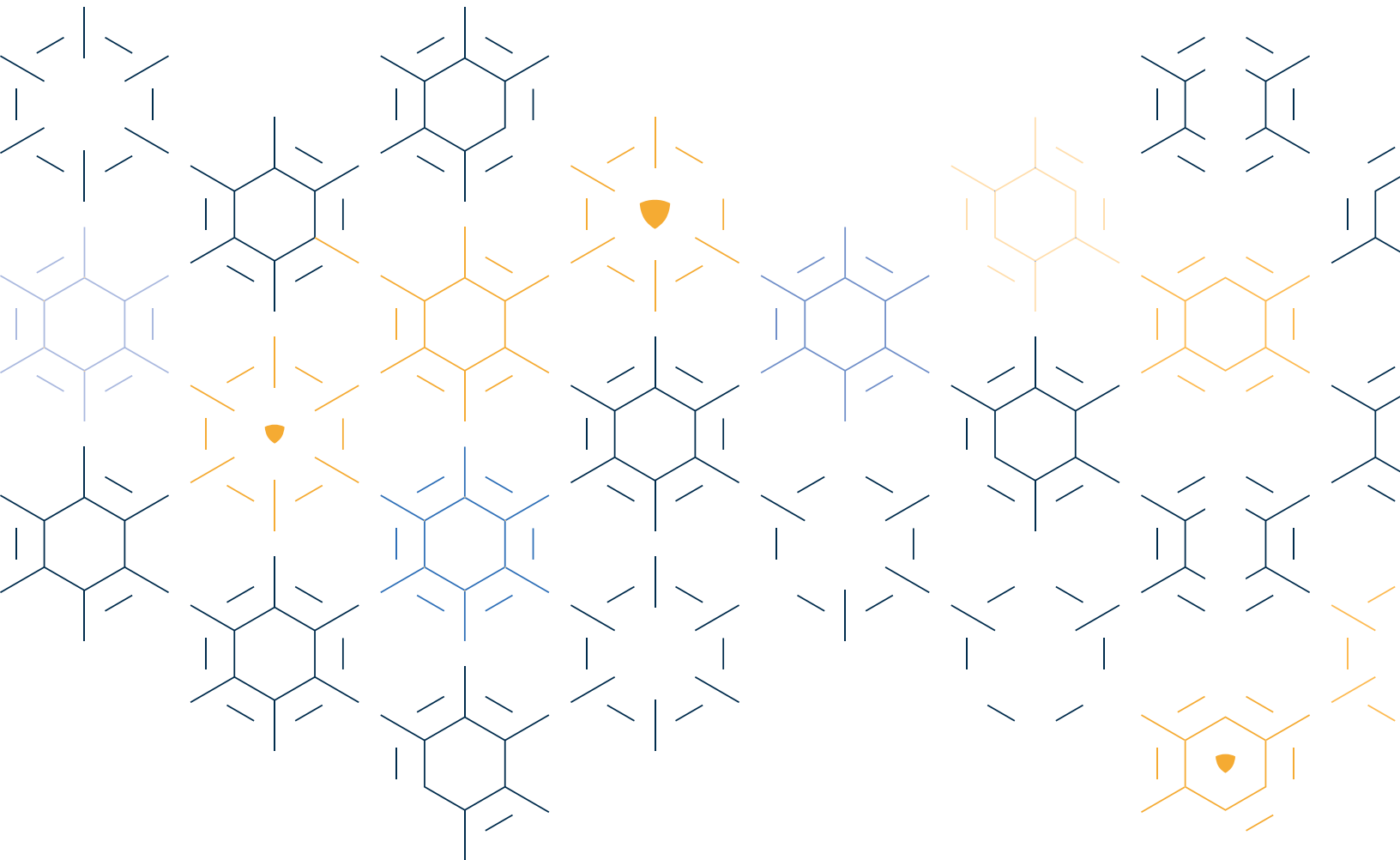
- Blizzard Warning: Issued for sustained or gusty winds of 35 mph or more, and falling or blowing snow creating visibilities at or below ¼ mile; with conditions persisting for at least 3 hours
- Wind Chill Advisory: Issued when wind chill temperatures are expected to be a significant inconvenience to life with prolonged exposure, and if caution is not exercised, could lead to hazardous exposure
- Wind Chill Warning: Issued when wind chill temperatures are expected to be hazardous to life within several minutes of exposure
- Winter Storm Warning: Issued when hazardous winter weather in the form of heavy snow, blizzard conditions, heavy freezing rain, or heavy sleet is imminent or occurring. Winter Storm Warnings are usually issued 12 to 24 hours before the event is expected to begin
- Winter Storm Watch: Alerts the public to the possibility of a blizzard, heavy snow, heavy freezing rain, or heavy sleet. Winter Storm watches are usually issued 12 to 48 hours before beginning of a winter storm.

Increased wind speed also causes heat to leave the body more rapidly (wind chill effect). Employees exposed to cold & windy conditions are at risk of cold stress, both air temperatures and wind speed affect how cold the workers feel. Wind Chill is the term used to describe the rate of heat loss from the human body, resulting from the combined effect of low air temperature, and wind speed. The Wind Chill Temperature is a single value that takes both air temperature, and wind speed into account. For example, when the air temperature is 40 degrees F, and the wind speed is 35 mph, the wind chill temperature is 28 degrees F; this measurement is the actual effect of the environmental cold on the exposed skin.

## Safety Tips for Workers

- You should know the symptoms of cold stress, and how to treat them and call for medical assistance if needed
- Monitor your physical condition and that of your coworkers
- Dress properly for the cold
- Stay dry in the cold because moisture or dampness, e.g., from sweating, can increase the rate of heat loss from the body
- Do not underestimate the wetting effects of perspiration as wicking and venting of the body's sweat and heat are more important than protecting from rain and snow
- Keep extra clothing (including underwear) handy in case you get wet and need to change into dry clothing during your shift
- Drink warm, sweetened fluids (sugar water, sports-type drinks), and avoid drinks with caffeine (coffee, tea, soda, or hot chocolate)

- To minimize the effects of cold due to wet feet, overheating or wet clothing while trying to walk through snow accumulations, and to minimize the potential for slips, trips or falls, when employees note that walkways regularly utilized for exterior patrols have become snow covered or icy and unsafe to traverse should contact their supervisor or client contact and cease using the walkways until they are cleared/sanded/salted as soon as practicable and deemed safe to be used.
- Unstable snow buildup, sharp icicles, and ice dams are potential hazards, if you encounter any of these cease work in that area and notify the client immediately.
- Use proper engineering controls, safe work practices, and personal protective equipment (PPE) provided by your employer. Cold weather supplies and PPE should be inspected daily whenever inclement winter conditions are being experienced and restocked as needed. If cold weather supplies or PPE are missing, damaged or running low employees are to notify management immediately.



## 27A COLD WEATHER SAFETY TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the Cold Weather Safety as required per Federal OSHA Regulations CFR 1910.132(d), CFR 1910.141 and CFR 1910.151, and Cal OSHA Title 8 Regulations, CCR 3203, CCR 1509 and CCR 1938.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name

cc: Personnel File



## SECTION 28

# Gate Safety

# Gate Safety

## Introduction

Gates are utilized to maintain boundary/perimeter security of many client locations. The entry and egress of personnel and vehicles of all types from client locations through gates are often the responsibility of Paragon officers, and the opening and closing of the gates can present safety hazards if the gates are not in good working condition. This document will give guidance on criteria to be followed to minimize near misses or injuries while officers are operating gates at client locations.

## Gate Types

Gates come in all types and sizes, and include:

- Horizontal Swinging
- Rolling
- Horizontal Sliding
- Inclined Rail
- Raising Arm
- Vertical Lift
- Vertical Pivot/Cantilever

Gates may be motorized, automated, or manually operated. Manually operated gates may be equipped with spring tension, weights, or other mechanisms to assist with the manual operation of heavier gates. (See Section 28a, Examples of Types of Gates)

## Classes of Gates

For each type of gate there are four classes. These are listed below with a brief description of each class.

Class 1: Residential Vehicular Application - Serves 1 to 4 single family dwellings and/or associated garages or parking

Class 2: Commercial / General Access Vehicular Application - Serves 5 or more single family dwellings, multi-unit housing, hotels, retail stores, or other Commercial enterprises serving the general public and / or associated garages or parking

Class 3: Industrial / Limited Access Vehicular Application - Serves industrial buildings or facilities not intended to serve the general public

Class 4: Restricted Access Vehicular Application - Serves restricted access areas where the general public is prohibited from entry by visual and/or physical supervision of the gate at all times



# Gate Safety Program

To ensure employee safety whenever employees utilize gates as part of their assigned responsibilities, a gate safety program is being put in place that will enable the safest operation of gates. This program is intended to provide Managers and employees with examples of the types of gates, proper inspection procedures to be used, training on the safe operation procedures, and proper notification procedures if deficiencies are noted.

The workplace inspection of all gates is a critical part of a comprehensive safety and health program in which gates are examined closely on a regular basis for the purpose of:

- Identifying and recording potential and actual hazards associated with gates and areas around the gates
- Identifying any hazards which require immediate attention if unsafe conditions are found
- Ensuring that existing hazard controls are functioning adequately; and where appropriate, recommending corrective action
- Verifying that the client has a regular gate maintenance program. And working with the District Director to help clients stay on top of regular maintenance schedules by reporting all gate issues.

Within any gate safety program, a variety of types of inspections may be needed, for example:

- Upon obtaining a new contract, and at least annually thereafter, all site gates are to be evaluated to determine if all gates are in good working condition by actually opening and closing the gates.
- All gates are to have proper gate warning signs attached to both sides of the gate that are easily seen and legible.
- Items to be inspected before officers are assigned a post at a gate:
  - » Manually operated gates:
    - In good condition - no broken or missing parts, rusty, or damaged items including rusty wheels, rusted hinges, missing tracks, missing roller guide covers
    - Moving freely, without need to lift, push/pull or force into open or closed position
    - Aligned properly,
    - Free of obstructions that prevent it from being opened/closed
    - Void of STF hazards in area of officer needs to walk in while opening or closing the gate,
    - Not in area that puts officer at risk from other hazards (e.g. moving traffic, machinery, railroad tracks)
  - » Motorized/automated gates:
    - Gate is working without the officer needing to manually open or close it
    - Gate equipped with emergency shut down if the gate malfunctions (NEVER try to override the gate controls)



» All Gates - look for damage or safety items such as:

- Sagging gates
  - Misaligned hinges
  - Damaged
  - Void of sharp areas
  - Latches not lined up with catch post
  - Rusted or damaged wheels
  - Missing covers on wheels
  - Missing or broken tracks
  - Missing or broken catch-post
  - Missing or broken positive stops (All horizontal sliding gates shall be equipped with positive stops or devices that limit the gate travel to designed fully open and closed positions. The positive stops or devices shall be constructed, installed and maintained by qualified persons to resist impact loads in order to safely contain sliding gate components within the designed stop limits.)
  - Catch posts are in place for sliding gates to prevent gate from falling if gate comes off guide rail or becomes disconnected from the operator
  - Pinch points between moving and stationary parts of fencing and gate where an individual's body part may become caught
  - Entrapment Zones – areas between opening or closing gates and stationary items or buildings that could crush an officer while gate is in operation (See Section 28d)
- All identified malfunctioning or hard to operate gates are to be documented and the client informed of all gate repairs needed before officers are assigned to posts

## Gate Hazards

By becoming familiar with the type of gate on the site and being able to identify the hazards, officers can help prevent injuries and accidents from occurring. Below is a list of some of the most common gate hazards:

- Pinch points caused by roller wheels can cause severe injury to hands and feet. Other pinch points to take note of include control arms that use a scissor motion.
- Entrapment zones can cause serious injury or death when a gate closes and pins somebody against a stationary object such as a vehicle.
- Heavy wind loads can cause a gate to disengage from the tracks, causing it to fall onto somebody and causing serious injury or death. Disengagement can also be caused by damage to the gate or lack of maintenance.
- Overexertion on manual gates can cause potential long-term damage to shoulders and back. Usually, this occurs when roller wheels are rusted or when there is any type of damage to the gate
- Gaps that are more than 2.25 Inches on a gate can cause severe damage if body parts get caught. Spaces are usually between vertical bars, or towards the ends of gates. Injuries typically occur when people reach through the bars.

## Officer Training

All officers are to receive training on the proper and safe operation of all gates prior to being assigned to a post where they are required to operate as part of their responsibilities.

This training is also to be given to officers prior to being assigned to a short term temporary or emergency assignment. If gate is not to be operated or used due to gate malfunction/safety issues, training is to include specifically what the officer's responsibilities are or are not to include.

Training is to include the following:

- All gates are to be evaluated at the beginning of each shift to determine if all mechanisms are working properly by using a Gate Safety Checklist or the VISION Gate Safety Checklist (see Section 28b and 28c). If any gate is not working properly or any safety items/concerns are noted the site supervisor is to be notified immediately and officers are to await instructions from supervision regarding what officers are to do.
- Officers are to be instructed that they are **NOT** to operate horizontal sliding gates that do not have positive stops or devices that limit the gate travel to the designated fully open and closed positions.
- All officers assigned to the site are to be given notice regarding any gate malfunctions at the beginning or during any shift, and Supervision is to notify the customer and determine if:
  - » Gate will be left open and a guard posted at the gate at all times until gate is repaired by client
  - » Gate will be kept closed and an alternate gate assigned until gate is repaired
- Officers are to be instructed that if a gate is malfunctioning or not opening and closing freely, is damaged by a vehicle, is binding, not swinging/rolling freely, cannot be closed/latched without lifting, straining, or using excessive force, officers are **NOT** to manually/physically force gate operation. They are to call for assistance, await instructions on how to proceed, and how to reroute inbound and outbound vehicles until assistance arrives. (Note: Vehicles are not to be allowed to proceed to enter or exit any gate that has been obstructed or has malfunctioned.)
- If during winter, a gate's movement is hindered by snow or ice, or if during rainy season, is mud/silt hindering movement officers are to be instructed to be aware of STF hazards and to be aware of their surroundings when opening or closing the gate.
- For extremely windy conditions, there is a potential for the gate to be caught by the wind and officers are to be trained to use extra caution to prevent the gate from being pulled out of the officer's hands or getting the officers hands caught/crushed if the gate slams shut.
- Officers are to receive instruction about gate entrapment hazards where the gate could cause an officer to be trapped between the gate and an inanimate object. (see Section 31d) Officers are to be given instruction about being on the proper side of the opening when the gate is beginning to open or close, **NOT** to walk through or under a gate that is mechanically closing, and **NEVER** stand in the path of gate travel, whether side-to-side or up and down. Officers are to be ALWAYS be aware of where they are standing to make sure they are clear of the gate at all times.
- Officers are to be cautioned that they should **NEVER** multitask while performing gate operations, they should always pay strict attention to where they are standing and be aware of where their hands and fingers are at all times while opening and closing any gate. To never stick their hands through a gate for any reason. If handles are provided they are to use them.

They are to watch for gate malfunctions while performing any opening or closing operations and always be prepared to take quick evasive action if the gate fails. Average weight for gates is between 800-1200 pounds; some are up to 2000 pounds, so if a gate starts to fall, they are to get out of the way and let it fall, they are to **NEVER** try to hold the gate up.

- As gate operations take place over and over again and are part of daily operations. Officers are to be instructed that if they find themselves getting complacent they are to take a minute to re-familiarize themselves with the gates at their post, do a quick hazard evaluation, and then ALWAYS take it slow and deliberate, and pay strict attention to what they are doing.

## Review of Inspection Reports

No matter how well conducted, gate inspections are worthwhile only if items raised are carefully considered and action is taken to correct identified hazards.

The level and types of persons given this responsibility will vary from one organization to another. The following should be kept in mind when allocating this responsibility:

- Analyzing inspection reports is a critical function for safety committees and representatives
- At least one person reviewing reports should have the authority necessary to take corrective action and to delegate actions to be taken as required
- Some gate issues may require the opinion of an expert such as a design engineer, or safety professional, or contracted gate maintenance provider.
- Follow-up action and feedback to those conducting inspections is an important factor of the gate safety program
- Items discovered during any gate inspection which represent an imminent danger (one that is likely to cause death or serious injury) should be reported to the responsible Supervisor or Manager immediately, and corrective action should be taken at once. The Manager should have the authority to suspend any work activities at gates that expose workers to an imminent danger.

## Corrective Actions if Gate Malfunctions

If a gate malfunctions, Paragon Management is to immediately notify the client, and inform the client of the situation and indicate that officers have been instructed not to allow entry or exit or to operate the gate and be on standby/post to prevent unauthorized entry until it is repaired.

Management is then to ask the client what they want to have done such as having an alternate location designated/used for vehicle entry or exit, and to be kept informed regarding when an authorized gate repair authority will be on site to repair the gate. If possible, Management is to observe the final repair of the gate to determine if the gate is functioning properly and request a verification in writing from the client or the repair authority that it has been repaired and fully functional. Upon receipt of the verification, and a reinspection of the gate, management will authorize officers to return to the post and operate the gate. Officers on all shifts are to be made aware of the repairs that have been made and cautioned to be mindful of what the malfunction was and be on the look-out for any recurrence of gate malfunction as they conduct their daily check of the gate.

## Resources & Regulations for Gate Safety Standards

There are a variety of resources and regulations for gate safety, a few of which are listed below. The more known about gates and gate safety, the more likely they will be operated safely.

1. Cal-OSHA Title 8, Section 3324 Horizontal Sliding Gates– requires that all horizontal sliding gates shall be equipped with positive stops or devices that limit the gate travel to the designed fully open and closed positions.
2. American Society for Testing and Materials. ASTM International is one of the largest voluntary standards development organizations in the world. A trusted source for technical standards for materials, products, systems, and services
3. OSHA Federal Law 29 CFR 1910.399- requires that all electrical equipment used in employee workplaces be listed, labeled, and system certified by a nationally recognized testing laboratory. OSHA can impose fines of \$70,000 per piece of non-certified equipment
4. The CPSC & UL set new safety standards for gates on June 2002. Underwriters Laboratories UL-325 Fifth edition requires a sensing device that will reverse a gate if it encounters an obstruction when opening or closing. A secondary sensing mechanism is also required, such as an electric eye or an edge sensor that will reverse the gate if an obstruction is detected
5. Door & Access Systems Manufacturers Association (DASMA) Set guidelines for new construction of gates based on UL-325 and ASTM F 2200 Standards

## 28A Examples of Types of Gates

This section is provided to give some pictures of the different types of gates officers may be required to operate as part of their assigned roles and responsibilities.

### Horizontal Swing Gate



- Can be opened manually or automatically
- Open inward or outward (outward opening gates are usually seen on elevated properties so that the weight caused by the slope does not burn out the motor)
- Automatic gates use a control arm to attach the gate to the opener box
- Automatic gates use access control devices which allow code entry, badge swipe, or remote controls
- All horizontal gates must have positive stops or a device that limits the gate travel to fully open/closed.



## Horizontal Slide Gate



- Can be manual or automatic
- Open by sliding sideways
- Use a track system for wheels to roll on
- Automatic gates use chain and gear systems, or hydraulic motor and drive rail systems (in which the only visible moving part is the gate) Access control devices include code entry, badge swipe, & remote controls
- All horizontal gates must have positive stops or a device that limits the gate travel to fully open/closed
- Positive stops or devices must be constructed, in-stalled and maintained by a qualified person to resist impact loads

## Vertical Lift Gate



- These are mostly used in industrial and commercial properties such as bus stations and logistic companies
- These are only automatic. No manual operation is available
- Open by rising upward, or vertically
- Operated by a more advanced hydraulic motor system. Each side of the gate has its own hydraulic motor and counter balance system
- Access control devices are used for this design

## Vertical Pivot (also called cantilever gates)



- Vertical pivot gates can be opened manually or automatically
- Vertical pivot gates support themselves; The gate opens by pivoting 90 degrees and is counter-balanced so it can be easily raised manually if necessary
- They have rails and rollers that support the gate, allowing it to open and close without touching the ground
- Access control devices such as code entry, re-mote controls and badge systems are typically used
- Manually operated gates have potential pinch point at pivot end, use handles when operating
- Note: Older versions of gates typically don't have sensing or reversing mechanisms, which makes them more dangerous



# 28B GATE SAFETY INSPECTION SHEET

Site: \_\_\_\_\_ Location Name: \_\_\_\_\_ Address: \_\_\_\_\_

Assessment Type: ☐ Initial (Account Startup) ☐ Annual Check ☐ Post Accident ☐ Duties Change

Assessment Date: \_\_\_\_\_ By Whom: \_\_\_\_\_ ☐ Site has Vision Installed

# of Gates at this Facility: \_\_\_\_\_ Gate Name (if more than one): \_\_\_\_\_ #EEs: \_\_\_\_\_

UL 325  
Installation  
Class: ☐ Class 1 (Home) ☐ Class 2 (Apartment/Condo Community)  
☐ Class 3 (Industrial Facility) ☐ Class 4 (Restricted or Max Security)

**Instructions:** Identify all applicable hazards & risks for each gate where the check is being conducted. Any categories that are identified in RED (Answered "N") must have a corresponding Corrective Action Plan (next page). For sites with more than one Gate, use one checklist for each Gate and submit all completed checklists together.

Please submit the completed form within one week of site startup / audit. Note: All forms must be filed with site PHA in the Client file, uploaded into SSE with the PHA, and cc'd in Post Orders with updated Gate Safety information.

## INSPECTION

### All Gates

- ☐ Y ☐ N ☐ n/a Gate has positive stops/devices that are properly constructed/installed/maintained (limit gate travel to fully open/closed position) (Positive stops / devices limit gate travel to designed fully open / closed positions)
- ☐ Y ☐ N ☐ n/a Vehicle gate areas are well lit at all times so all officer activities are visible to drivers, and officers can make required inspections
- ☐ Y ☐ N ☐ n/a Road surfaces in entry & exit lane areas are free of pot holes, uneven surfaces, & trip hazards (e.g. wide cracks, raised cracks, pieces of loose gravel, broken pieces of roadway, etc.)
- ☐ Y ☐ N ☐ n/a There is a safety gate label on the operator
- ☐ Y ☐ N ☐ n/a Gate is approved to current UL 325 standards (check operator label)
- ☐ Y ☐ N ☐ n/a Proper gate warning signs are securely attached to both sides of the gate & easily seen
- ☐ Y ☐ N ☐ n/a Gate has smooth bottom edges, with no protrusions
- ☐ Y ☐ N ☐ n/a All access control points (telephone entry, card readers) are at least 6 ft. from the gate
- ☐ Y ☐ N ☐ n/a If there is barbed tape, it is at least 8 ft. above grade
- ☐ Y ☐ N ☐ n/a If there is barbed wire, it is at least 6 ft. above grade
- ☐ Y ☐ N ☐ n/a Separate pedestrian gate is out of reach of moving gate (vehicular gate is for automotive traffic only)

### Swinging Gates:

- ☐ Y ☐ N ☐ n/a Distance from gate pivot point to stationary item is less than 4 in.
- ☐ Y ☐ N ☐ n/a Distance from open gate to wall/column is greater than 16 in.?

### Sliding Gates

- ☐ Y ☐ N ☐ n/a There are roller covers on each wheel
- ☐ Y ☐ N ☐ n/a Meshing is installed if there is less than 2.25 in. between gate rails /pickets
- ☐ Y ☐ N ☐ n/a Catchpost is present to prevent gate from falling, should it become disconnected from the operator
- ☐ Y ☐ N ☐ n/a Positive stops at both fully open & fully closed positions

### Entrapment Zones

- ☐ Y ☐ N ☐ n/a Entrapment zone areas are clearly marked

### IIPP

- ☐ Y ☐ N ☐ n/a Site has custom IIPP that specifically delineates procedures for hazard identification, hazard correction, operational procedures and employee training

- |  |   |
|--|---|
| <input type="checkbox"/> Post Orders Updated                         | <input type="checkbox"/> Gate Safety Checklist and PHA filed in Client file       |
| <input type="checkbox"/> Gate Safety Checklist placed in Post Orders | <input type="checkbox"/> Gate Safety Checklist and PHA uploaded into SSE          |
| <input type="checkbox"/> PHA Completed                               | <input type="checkbox"/> Gate Safety Checklist submitted to Region Safety Manager |
| <input type="checkbox"/> Corrective Action Plan in place             |   |

**Date of Assessment:** \_\_\_\_\_ **Assessment Conducted by:** \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Corrective action taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Corrective action taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Corrective action taken: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_ Date Completed: \_\_\_\_\_

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

---

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

---

Identified unsafe condition or work practice: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Corrective action taken: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Date Completed: \_\_\_\_\_

**NOTES:**

## 28C VISION GATE SAFETY INSPECTION CHECKLIST

The following is an example of what a completed VISION gate safety inspection checklist would look like:

### GATE SAFETY CHECKLIST

Report #:	262159
Report Date:	05/26/2022
Report Time:	09:37am EDT
Created By:	Jonathan Williams #N/A
Client:	#999999
Location Name:	Front Gate
Assessment Type:	Initial (Account Startup)
Assessment Date:	05/10/2022
By Whom:	Josh Werman
Number of gates at this facility:	1
Gate name/location (if more than one):	Front Gate
Number of security officers assigned to the site:	7
UL 325 Installation Class:	Class 1 (Residential vehicle gate, 1-4 dwellings)

Instructions: Identify all applicable hazards & risks for each gate where the check is being conducted.

Any categories that are identified in RED (Answered "N") must have a corresponding Corrective Action Plan.

For sites with more than one Gate, use one checklist for each Gate and submit all completed checklists together.

Please submit the completed form within one week of site startup / audit.

Note: All forms must be filed with site PHA in the Client file, uploaded into SSE with the PHA, and cc'd in Post Orders with updated Gate Safety information.

### INSPECTION

#### All Gates:

Gate has positive stops/devices that are properly constructed/installed/maintained (Positive Stops must be designed & installed to limit gate travel to safely stop at fully open/closed positions)  Note: If answered NO, DO NOT operate or try to fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>Yes</b>
--	------------

Vehicle gate areas are well lit at all times so all officer activities are visible to drivers, and officers can make required inspections	<b>Yes</b>
Road surfaces in entry & exit lane areas are free of pot holes, uneven surfaces, & trip hazards (e.g. wide cracks, raised cracks, pieces of loose gravel, broken pieces of roadway, etc. and curbs are highlighted)	<b>No</b>
There is a safety gate label (proper signage) on the operator	<b>Yes</b>
Gate is approved to current UL 325 standards (check operator label)	<b>Yes</b>
Proper gate warning signs are securely attached to both sides of the gate & easily seen	<b>Yes</b>
Gate has smooth bottom edges, with no Protrusions	<b>Yes</b>
All access control points (telephone entry, card readers) are at least 6 ft. from the gate	<b>No</b>
If there is barbed/razor tape, it is at least 8 ft. above grade	<b>Yes</b>
If there is barbed wire, it is at least 6 ft. above grade	<b>Yes</b>
Separate pedestrian gate is out of reach of moving gate (vehicular gate is for automotive traffic only)	<b>Yes</b>
Gate is operating properly, properly aligned, and is not damaged or in need of repair Note: If answered NO, DO NOT operate or try To fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>Yes</b>

### Swing Gates:

Distance from gate pivot point to stationary item is less than 4 in.	<b>N/A</b>
Distance from open gate to wall/column is greater than 16 in.	<b>N/A</b>
Gate can be secured in open position to prevent premature closing	<b>N/A</b>
Gate swings freely without any obstructions preventing full opening/closing Note: If answered NO, DO NOT operate or try to fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>N/A</b>

### Swing Gates:

There are roller covers on each wheel	<b>N/A</b>
Surface that rollers move on is smooth and gate moves freely without need of any effort to open or close. Note: If answered NO, DO NOT operate or try to fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>N/A</b>
Meshing is installed if there is less than 2.25 in. between gate rails /pickets	<b>N/A</b>
Catch post is present to prevent gate from falling, should it become disconnected from the operator or comes off guidance rail Note: If answered NO, DO NOT operate or try To fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>N/A</b>
There are positive stops at both fully open & fully closed positions Note: If answered NO, DO NOT operate or try to fix this gate until the potential safety hazard has been corrected. Immediately contact Supervision or Management regarding what steps are to be taken until the gate is repaired.	<b>N/A</b>

### Entrapment Zones:

Entrapment zone areas are clearly marked	<b>Yes</b>
--	------------

### Injury & Illness Prevention Program:

Site has custom Injury & Illness Prevention Program that specifically delineates procedures for hazard identification, hazard correction, operational procedures and employee training	<b>Yes</b>
Post Orders Updated	<b>x</b>
Gate Safety Checklist placed in Post Orders	<b>x</b>
PHA (Periodic Hazard Assessment) Completed	<b>x</b>
Corrective Action Plan in place	<b>x</b>
Gate Safety Checklist and PHA filed in Client file	<b>x</b>
Gate Safety Checklist and PHA uploaded into SSE	<b>x</b>
Gate Safety Checklist submitted to Region Safety Manager	<b>x</b>

Identified Unsafe Condition / Work Practice: None	<b>None</b>
Corrective Action Taken:	<b>N/A</b>
Date Completed:	<b>05/17/2022</b>
Identified Unsafe Condition / Work Practice:	<b>None</b>
Corrective Action Taken:	<b>N/A</b>
Date Completed:	<b>05/17/2022</b>
Identified Unsafe Condition / Work Practice:	<b>None</b>
Corrective Action Taken:	<b>N/A</b>
Date Completed:	<b>05/17/2022</b>
Identified Unsafe Condition / Work Practice:	<b>None</b>
Corrective Action Taken:	<b>N/A</b>
Date Completed:	<b>05/17/2022</b>



## 28D GATE ENTRAPMENT SAFETY

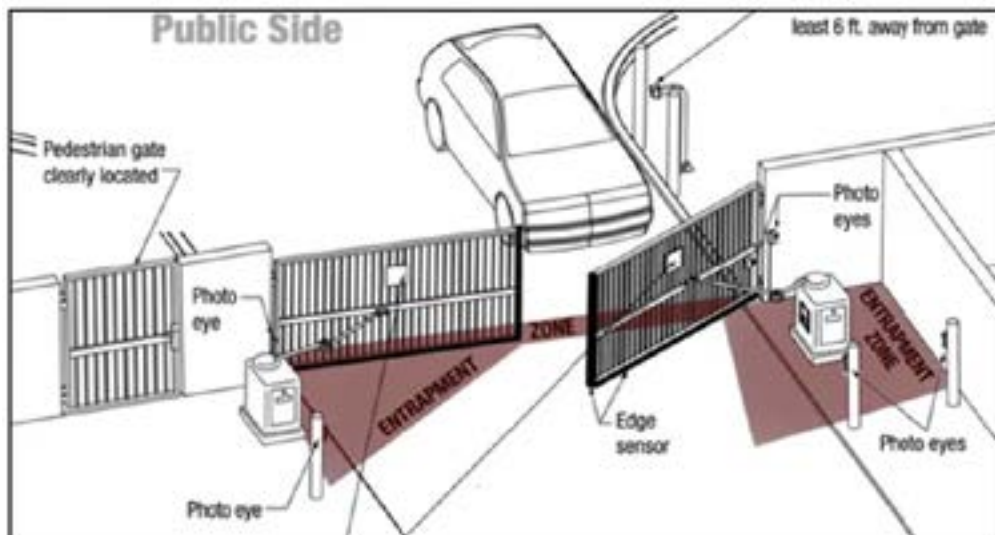
Vehicular and automated gates pose a risk of severe injury or death if an individual becomes trapped between a moving gate and a stationary object, such as a post or wall. Any location where this could occur is called an entrapment zone.

Follow these steps when working with entrapment zones:

- Stand clear of all moving gates by avoiding Entrapment Zones, and pinch points. If site uses manually operated gates, be aware of your surroundings when opening or closing the gates.
- Be aware of all Pinch Points – A point in between moving and stationary parts of a machine where an individual's body part may become caught
- **Never stand in an Entrapment Zone!**

### Swinging Gate Entrapment Zone Caution

- Example of typical Entrapment Zones of an Automated Swinging Gate:



- Be aware of Opening Entrapment Zones between gate and any stationary object



- Be aware of Closing Entrapment Zones between posts, wall or in dual gate applications, the point where the two gates meet



### Swinging Gate Entrapment Zone Caution

- Be aware of Opening Entrapment Zone between rear edge of moving gate and any rigid object that the edge might pass or approach



- Be aware of Closing Entrapment Zone between posts, wall or in dual gate applications the point where the two gates meet



## 28E GATE SAFETY TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received a copy of the “Gate Safety Awareness Handout” and have read and understood the information contained in the handout.

As part of my site-specific training I have been shown how to operate and use gates safely and have taken time to understand the proper safe use of the gates that I will be operating or using as part of my roles & responsibilities. I will follow the site post orders for the immediate reporting of any noted or identified malfunction or problems with any gate operation to supervision or site management.

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Employee Name (Print)

---

Date

---

Employee Signature

---

Instructor/Trainer Name

cc: Personnel File



## SECTION 29

# Fatigue Management

# Fatigue Management

## Introduction

Worker fatigue can contribute to an increase in employee injury/illness, may affect employee performance, and may affect worker safety. Therefore, Paragon has adopted a fatigue management plan to help ensure the health and safety of the employees. The Paragon Manager of each account is responsible for enforcing the fatigue management policy.

## Causes of Worker Fatigue

Fatigue is the body's way of indicating that a period of rest is needed. It often is a state of feeling very tired, exhausted, weary or sleepy. Several conditions can cause fatigue including a lack of sleep, poor quality of sleep, interrupted sleep over a period of time, or sleep disorders e.g. insomnia, sleep apnea, restless leg syndrome, or narcolepsy. It can also be caused by workplace factors such as prolonged mental activity, long periods of stress or anxiety, boring or repetitive tasks, high temperatures, high noise levels, dim lighting or poor visibility, or long hours and extended and irregular work shifts that may be stressful physically, mentally and emotionally as it may disrupt the body's circadian rhythm sleep/wake cycle where the body is programmed for sleeping during night hours. Demanding work schedules may disrupt the body's natural cycle leading to increased fatigue, stress and lack of concentration.

## Signs and Symptoms of Fatigue

- Tiredness, weariness, or sleepiness including falling asleep
- Irritability or reduced ability to handle stress on the job
- Memory lapses, reduced ability to recall details
- Difficulty concentrating and forgetfulness
- Depression
- Increased susceptibility to illness
- Giddiness, headaches, loss of appetite, or digestive problems

## Effects of Fatigue

- Reduced mental and physical functioning including complex planning
- Impaired judgment, concentration, or decision-making ability
- Lowered motivation with reduced attention and vigilance
- Slowed reaction time in both speed and reduced co-ordination
- Increased risk-taking behavior or errors in judgment
- Reduced productivity/performance, and failure to respond to changes in surroundings or information provided

## Control of Worker Fatigue

To control worker fatigue initial training and annual refresher training is to be provided on how to:

- Recognize fatigue
- Control fatigue through appropriate workplace evaluation of workload, activities and work hours and breaks, staffing requirements, work conditions that can/could contribute to worker fatigue
- Providing worker education and training that addresses hazards of workplace fatigue, symptoms of worker fatigue, impact of fatigue on health and relationships, adequate quality and quantity of sleep, importance of diet, exercise and stress management strategies to minimize the adverse effects of fatigue
- Reporting fatigue to supervision

Paragon strives to set work hour limitations and strives to control job rotations schedules that provide more favorable patterns allowing workers sufficient recovery times and provide periodic rest breaks for personnel. Periodic evaluations are to be conducted to determine if work tasks or work areas need to be improved to control fatigue. If determined that any equipment or conditions need to be addressed to minimize fatigue in the workplace Paragon will provide equipment as deemed appropriate.

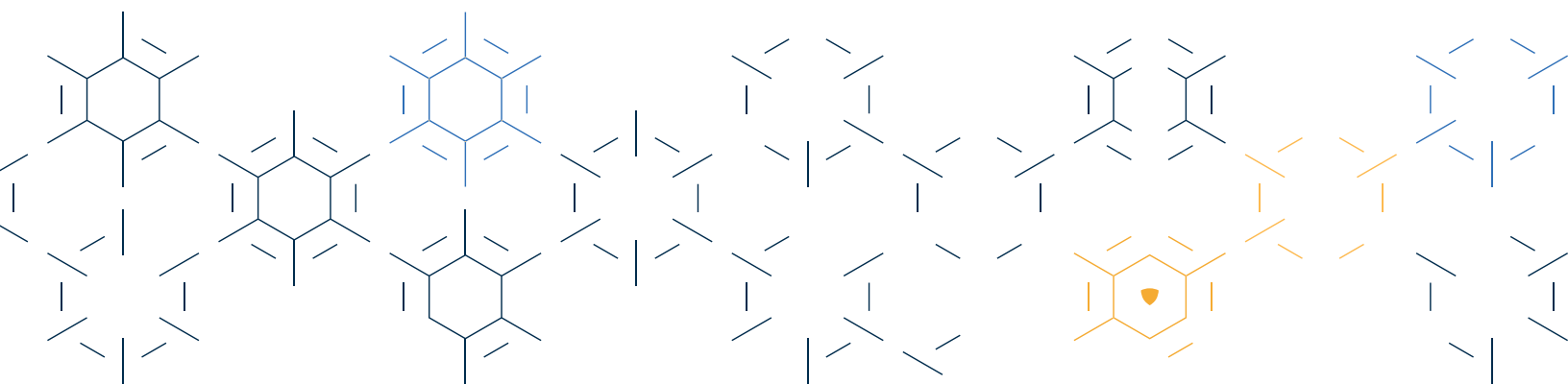
## Fighting Fatigue

Although fatigue may be alleviated by taking prescription or over-the-counter drugs to increase mental alertness, Paragon discourages all employees from taking any substance known to increase fatigue after effects of the substances wear off.

## Reporting

To minimize the potential for injury and prevent loss, all employees feeling fatigue, tiredness, or lack of mental acuity must report their condition to their supervisor immediately.

Supervision must take appropriate actions to prevent loss and determine if changes in work scheduling or tasks would address/alleviate employee fatigue.







## SECTION 30

# Working Alone Policy



# Working Alone Policy

## Introduction

It is Paragon policy to promote safety while officers are assigned to working alone in client facilities. Therefore, Paragon has implemented this company policy for working alone to ensure the health and safety of workers at the work site.

The Paragon Manager is responsible for ensuring the following written policy for the control, training, personal protective equipment and safe work practices for officers working alone in the workplace is enforced.

All workers who are assigned to work alone at client facilities are to be informed of this written policy.

## Working Alone

Working alone applies when a worker is the only one working at a work site where assistance is not readily available if:

- There is an emergency, or
- The worker is injured or ill

Depending on work conditions and unforeseen situations, Paragon will notify workers when they will not be permitted to work alone, and arrangements will be made to make sure additional staffing will be provided to ensure officer safety if deemed necessary.

## Hazard Identification, Elimination, and Control

Before any worker is assigned to work alone or in an isolated location the responsible Paragon Manager will conduct a hazard assessment to identify any hazard potential to the worker. The manager will take measures to eliminate or reduce identified hazards. Officers will be informed of all hazards in the workplace as part of their orientation to the work site.

## Communication

A safe work procedure for communication will be developed and provided to Officers that will work alone or in isolated locations that will identify persons or contacts that will be capable of providing/offering of assistance to the worker in an emergency or if the worker is injured or ill. Communication will be provided via:

- Two-way Radio
- Telephone and/or Cell Phone, or
- Other Type of Electronic Communication



When electronic communication is not practicable or readily available at the work site and alternate form of communications will be implemented for workers who work alone. These may include:

- The worker being visited on site by a Paragon or competent worker
- The worker is to be contacted or the worker is to contact a Paragon or a designated competent worker on a regular or designated timetable
- The visits or contacts will be at intervals of time appropriate to the nature of the hazards associated with the work being performed by the worker

## **Contact Person**

A designated worker or designated competent worker will be assigned to establish contact with the lone or isolated worker at regular predetermined intervals and shall record the results of each contact attempt. If the worker is to initiate the contact, the worker is to be given instruction on how and when to make the contact, along with appropriate contact names or numbers to be called.

## **Procedures for Checking the Well-being of a Worker**

Written procedures for checking the well-being of any worker assigned to work alone or working in an isolated area shall be implemented in consultation with the local district staff. The written procedures shall include:

- A system to check on the workers well-being at regular time intervals, including a check at the beginning of the work shift, during the work shift, and a final check at the end of the work shift. The system may include the worker calling in at the beginning of a patrol, with designated call-ins during the patrol and after the patrol is finished. All checks are to be documented.
- The procedures to follow when the worker cannot be contacted or does not call in within a designated time table
- Provisions for search and emergency rescue

## **Emergency Procedures**

Emergency procedures are to be in place and shall take into consideration the length of time the worker is missing or has not been able to be contacted, or has failed to call in, weather conditions, worker physical condition, etc. If a lone worker cannot be contacted by Paragon or the lone workers known associates, an employee search will be initialized.

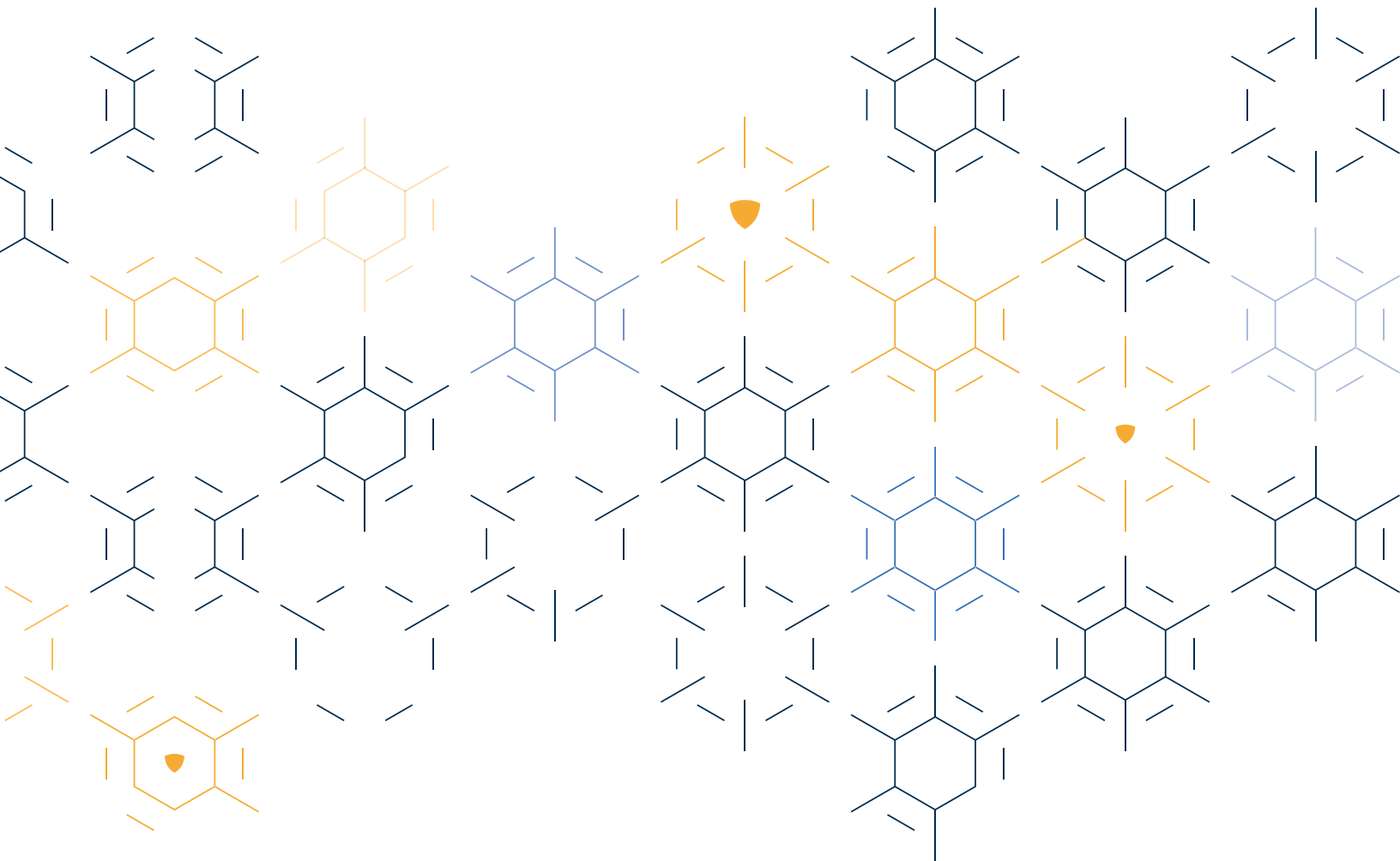
The procedures that are to be followed in the event of an emergency are to include:

- Inform the emergency chain of command of the emergency
- Report the emergency to the local fire and police departments
- Conduct an orderly efficient search for the missing worker based upon last known contact location or designated patrol routes
- Perform rescue and first aid what may be necessary during the emergency after the missing worker is found

If the location of the found worker is the result of unsafe or hazardous condition e.g. a fire other

situation the emergency procedure is to include:

- Warning employees about the emergency
- Conducting an orderly/efficient worksite evacuation if needed
- Assisting employees with disabilities or injuries during an evacuation
- Shutting down critical equipment, use of fire extinguishers, and performing essential services during an evacuation
- Accounting for employees at a designated safe area after the emergency evacuation





## SECTION 31

# Stop Work Authority Policy

# Stop Work Authority Policy

## Introduction

It is Paragon policy to promote safety while officers are assigned to client facilities. Therefore, Paragon has implemented this company policy that employees have the authority to stop work if a task exposes them to a dangerous condition.

The Paragon Manager is responsible for ensuring the following written policy for the control, training, personal protective equipment and safe work practices is enforced.

## Training

All workers who are to receive Stop Work Authority training before initial assignment to client facilities are to be informed of this written policy.

## HSE Risk

Stop Work Authority (SWA) is a program designed to provide all employees with the responsibility and obligation to stop work when a perceived unsafe condition or behavior may result in an unwanted event. SWA should be initiated for conditions, behaviors, concerns or questions are raised that threaten danger or are imminent danger to person(s), equipment, or the environment.

SWA should be exercised any time an employee feels that a job cannot be done safely, if a co-worker is engaged in unsafe work practices, if continuing work would require operating outside of design parameters, if any equipment, process or person is not working safely, If employee does not have the correct tool for the job, if felt someone or self does not have sufficient training for the job, or is any other risk presents itself during work that has not been sufficiently controlled.

Situations that may warrant SWA may include:

- Alarms
- Changes in conditions
- Changes in the scope of work or work plan
- Emergency situations
- Improper use of equipment
- A lack of information, knowledge or understanding of what is to be done
- A near-miss incident
- Identified unsafe conditions

All Paragon employees are responsible to initiate a stop work intervention when warranted, and Management is responsible to create a culture where SWA is exercised freely. Paragon ensures that employees will not be reprimanded for issuing a stop work intervention, and Paragon will not tolerate any form of retribution or intimidation directed at any individual for exercising their right to issue a SWA.

## Steps for Stop Work Authority

Steps of a SWA process consist of:

- Stop
- Notify
- Investigate
- Correct
- Resume
- Follow-up

When an unsafe condition is identified the stop work intervention will be initiated and coordinated through the supervisor, initiated in a positive manner, will notify all affected personnel and supervision of the stop work issue, investigate what can be done to eliminate or make the condition or work safe to perform, correct the issue, and only resume work when the unsafe condition or issues have been adequately addressed. Then follow up by documenting of conditions, lessons learned, corrective measures taken and put in place.

## Stop Work Reports

Supervision and Management is to review all stop work reports to:

- Measure participation
- Determine quality of interventions and follow-ups
- Trend common issues
- Identify opportunities for improvement
- Facilitate sharing of what has been learned to all Operations Managers and employees
- Promptly review all stop work reports to identify any additional investigation or required follow-up

## Importance of Follow-up

Most stop work issues can be resolved in a timely manner at the job site. Occasionally additional investigation and corrective actions may be required to and address root causes.

Paragon is to conduct a follow-up after a Stop Work Intervention has been initiated and closed to verify that the identified safety concern(s) have been addressed to the satisfaction of all involved persons prior to the resumption of work.

## 31A STOP WORK AUTHORITY TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on the Paragon Stop Work Authority program, and fully understand the appropriate actions as defined in the procedures of this program as required by Federal OSHA Regulation 29 CFR1977.12(b)(2) and Cal OSHA Title 8 Regulation CCR 8406(f).

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Employee Name (Print)

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Date

---

Employee Signature

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Instructor/Trainer Name

cc: Personnel File





## SECTION 32

# Fit for Duty Policy

# Fit for Duty Policy

## Introduction

It is the policy of Paragon to provide a drug-free, safe and healthy workforce and workplace for all employees. All employees must be physically capable of performing their job functions. To achieve this goal, employees are required to be fit to perform their job duties in a safe and satisfactory manner. Safe work practices and procedures must be followed at all times.

## Company Responsibilities

Prior to beginning an assignment at a client site, employees are properly trained for their assigned tasks and trained how to safely accomplish the agreed upon tasks required under the contract between Paragon and the client for security services.

## Employee Responsibilities

Employees must take responsibility for their own safety as well as the safety of their co-workers. Employees should not report to work if they are in a physical condition which could endanger themselves or the safety of their co-workers. They should immediately notify their supervisor of any conditions that they feel impair their ability to work safely.

## Drug and Alcohol Position

While conducting business related activities on-site or off-site, no employee may use, possess, distribute, sell or be under the influence of alcohol or engage in the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance or illegal drug. Any employee who violates this policy may be subject to disciplinary action up to and including immediate termination of employment.

The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and safely in a manner that does not endanger clients or other individuals in the workplace. Any employee, who is using a prescribed medication that might impair his or her ability to perform his or her job, or might create a safety hazard, should discuss the matter with his or her HR Representative. Employees with medical conditions are urged to work collaboratively with their supervisors to consider all reasonable accommodation options to continue to work.

If an employee assigned to a site is observed by management to appear unfit for duty, he/she will be interviewed to determine if the employee can perform the essential functions of the job. Associate's activities and behaviors will be monitored to determine if employees should be removed from the work site. Depending on the information received and medical documentation received, the employee will be engaged in the interactive process to determine a reasonable accommodation. If no accommodation can be reached, the employee may be offered another available assignment or offered available medical leave options. Emergency medical care will be immediately obtained whenever there is a question of acute illness or impairment that threatens the safety of the employee or others.

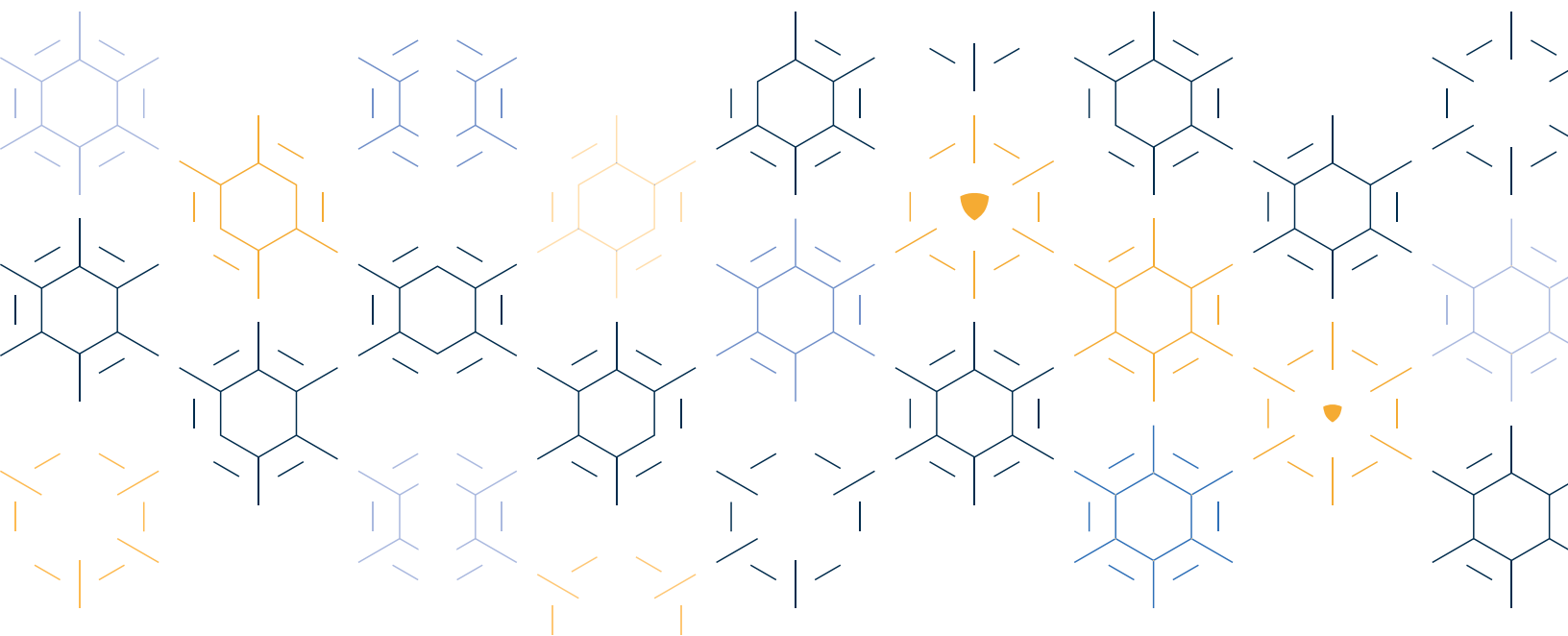
## Drug and Alcohol Testing

Based on contractually agreed upon requirements between Paragon and clients and Paragon company policy, employees may be drug and alcohol tested as part of the pre-employment protocol. Additional drug or alcohol testing may be conducted/requested by Paragon after an accident or injury only if there is reasonable suspicion that the involved employee that caused the accident, was involved in an accident, or was injured was impaired due to drugs or alcohol. Random drug testing may also be prescribed by the contract with a client or where permitted by state law.

Employees who are tested after an accident or injury should not be allowed to return to the workplace unless the test result is negative.

## Employee Assistance

Paragon provides Employee Assistance Program (EAP) consultation services and strongly encourages employees to use these resources for help with alcohol, other drug problems, or other personal concerns. It is each employee's responsibility to seek assistance from the contracted professionals prior to reaching a point where such employee's judgment, task performance or workplace behavior is negatively affected.





## SECTION 33

# Preventive Maintenance Policy

# Preventive Maintenance Policy

## Introduction

Paragon has implemented this Preventive Maintenance Policy to ensure that all company owned equipment is documented and maintained to maximize the safe usage of the equipment whenever used by its employees. It is the responsibility of the Paragon Account Manager to verify that this policy is fully enforced.

## Equipment Inventory

An inventory of all equipment and machinery is to be maintained and kept current. All new equipment is to be added to the inventory upon purchase and all equipment removed from service is to be deleted from the inventory on day of removal. The date of introduction or removal is to be noted on the inventory.

For equipment that is designed to have parts replaced on a regular basis, spare parts are too kept in stock in sufficient quantities to permit replacement in a timely manner at locations where used. Spare parts inventory is to be verified on a scheduled frequency e.g. monthly or more frequently depending on demand/usage.

## Preventive Maintenance Schedule

Equipment and machinery are to be kept in good working order at all times. A maintenance schedule for all equipment and machinery is to be based on the manufacturers recommendation and requirements and industry standards. Maintenance is to be completed by certified technicians or repair facilities. All preventative maintenance is to be documented and retained for the life of the device/unit.

For equipment that requires regular part replacement by users, the employees are to receive training on the proper checks to be made to determine proper equipment function, proper replacement procedures and techniques that are to be used, the proper parts to be installed, and the proper checks that are to be made to verify the equipment is functioning properly after parts have been replaced before being put back in service. If determined parts will not be replaced by employees, the replacement of parts is to be conducted by appropriately trained personnel or technicians.

## Defective Equipment

In addition to scheduled maintenance, all equipment and machinery are to be inspected before and after each use to determine if it is in good safe working condition. If found to be in an unsafe condition or if not operating/functioning properly it is not to be used and the defects are to be reported to supervision. If anything is noted, the equipment or machinery are to be immediately taken out of service, tagged, and not used until it has been properly repaired or replaced.



## SECTION 34

# Regulated Chemical & Hazardous Material Policy



# Regulated Chemical and Hazardous Material Policy

## Introduction

It is the policy of Paragon to provide a, safe and healthy workplace for all employees. To achieve this goal, whenever officers are assigned to client locations where regulated chemicals or identified hazardous materials are being used or distributed as part of a manufacturing process officers are to receive documented training regarding the hazards affiliated with the materials. Safe work practices and procedures are to be established and must be followed at all times.

## Company Responsibilities

Prior to beginning an assignment at a client site, employees are properly trained for their assigned tasks and trained how to safely accomplish the agreed upon tasks required under the contract between Paragon and the client for security services.

## Employee Responsibilities

Employees must take responsibility for their own safety as well as the safety of their co-workers. They should immediately notify their supervisor of any workplace conditions that they feel impair their ability to work safely.

## Regulated Chemical and Hazardous Material Position

Specific OSHA Standards/Regulations listed in Subpart Z are in place for specific Toxic and Hazardous Substances. OSHA has designated a list of Toxic and Substances in 1910.100 Table Z-1 which indicates the Limits for Air Contaminants, Table Z-2 which indicates the 8-hour Time Weighted Average (TWA) and Ceiling (C) concentrations for Toxic and Hazardous Substances, and Table Z-3 which indicates the exposure limits for Mineral dusts. Paragon does not manufacture, package or distribute any regulated chemicals or hazardous materials. But upon being awarded a contract to perform security services at any facility that performs these operations with any of the listed materials, Paragon will obtain the list of the materials along with the areas where the materials are being produced or used from the client along with the client's standard operation procedures and emergency plans for the materials as applicable based upon the contractually agreed upon designated roles and responsibilities to be performed as part of security operations at the site. Should designated roles and responsibilities be determined to have the potential exposure to any of the hazardous substances listed in Tables Z-1, Z-2, or Z-3 Paragon will follow the client's written programs to limit the officer exposures to within the designated guidelines and shall implement and follow the regulations and requirements of the listed chemicals. Training and information about the hazardous material's physical characteristics, potential health effects, and appropriate safety precautions will be given in a manner and language that the officers will understand in accordance with the written site's Hazardous Communication/GHS program. Depending on tasks to be performed, when deemed necessary, appropriate Personal Protective Equipment will be provided to ensure officer protection. And where required by specific standards, depending on the level of exposures being experienced, appropriate medical procedures and testing will be provided at intervals as designated by the standards.



## 34A.1 ASBESTOS AWARENESS TRAINING ACKNOWLEDGMENT

### PARAGON

I acknowledge that I have received information and training on Asbestos Awareness as required per Federal OSHA Regulations CFR 1910.1001 and Cal OSHA Title 8 Regulations CCR 1529, CCR 5208 and CCR 1028.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name

cc: Personnel File

## 34B Benzene Awareness

This safety guideline is intended to provide safety information to all Paragon employees regarding the potential toxic effects of Benzene so that adequate measures can be taken to limit exposures through controls in the workplace.

*NOTE: If Paragon employees are to work in areas where a client company has identified the presence or usage of Benzene, these areas will be disclosed to Paragon and determined to be safe before Paragon officers will be permitted to conduct tours or enter the work areas. Paragon does not knowingly allow employees to work in areas where they will have exposure to high levels of Benzene above established guidelines.*

### General

Of all the hydrocarbons, Benzene poses the most serious long-term threat. Exposure over time, to even low levels of Benzene can cause leukemia, blood changes and aplastic anemia

### Characteristics

Benzene is a colorless to light-yellow liquid with a pleasant sweet odor.

- Formula: C<sub>6</sub>H<sub>6</sub>
- CAS No.: 71-43-2
- Permissible Exposure Limit (PEL): 1 part per million (ppm) as an 8-hour time weighted average
- Short Term Exposure Limit (STEL): 5 ppm as averaged over a 15-minute period

Benzene is a flammable liquid that can accumulate static electricity. Benzene vapors are heavier than air and may travel to a source of ignition and flash back. The vapors are readily dispersed by wind movement and/or air currents. Liquid benzene tends to float on water and may travel to a source of ignition and spread fire. Benzene is highly reactive with no oxidizing materials.

### Uses

Benzene is a component of gasoline, both in the manufacturing process and found naturally in crude oil; Benzene is also used as a feed stock for chemical manufacturing.

### Health Effects

### Warning

Benzene is a cancer-causing agent in humans. All contact should be reduced to the lowest possible level. The exposure limits indicated above in the characteristics are for air levels only. Skin contact may also cause overexposure.

Benzene is one of the most hazardous of all petroleum products because of its adverse health hazards and high flammability.

The following adverse health effects are important to remember where there may be a potential exposure to Benzene above the established guidelines:

- a. Acute: At high concentrations (1000 ppm) Benzene has an acute effect on the central nervous systems causing headaches, dizziness, drowsiness, unconsciousness, and possible death. Acute exposure can also cause breathlessness, irritability, and giddiness.
- b. Chronic: Benzene has the chronic exposure effect on bone marrow (aplastic anemia leukemia). Chronic exposure can also cause convulsions, liver damage, heart damage, blood diseases (aplastic anemia), and cancer (leukemia). These symptoms can take months or years to surface and can develop without physical or visible indications.
- c. Repeated skin contact leads to irritant contact dermatitis (rash); as with any petroleum solvent (which Benzene is also classified as), it will leach the natural oils out of the skin. Direct contact with the skin can cause erythema and/or blistering.
- d. Benzene is irritating to eyes and mucous membranes.
- e. Flammable/dangerous fire risk: benzene has a very low flash point making it dangerous to have any open flame, spark or source of ignition when vapors are present.
- f. Explosive limits in air 1.5 to 8% by volume: benzene is highly flammable at low levels of vapor quantity in air.

## Personal Protective Measures

Paragon employees are not permitted to work in or enter areas where there may be a potential for Benzene exposure above established guidelines or in areas that are posted as regulated areas with signage e.g.:

- DANGER
- BENZENE
- CANCER HAZARD
- FLAMMABLE LIQUID AND VAPOR DO NOT SMOKE
- WEAR RESPIRATORY PROTECTION IN THIS AREA
- AUTHORIZED PERSONNEL ONLY

## Training

Paragon employees that will be working at facilities that have a potential exposure to Benzene will be provided awareness training in this program to become familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard.

## 34B.1 BENZENE AWARENESS TRAINING ACKNOWLEDGEMENT

### PARAGON

I acknowledge that I have received information and training on Benzene Awareness as required per Federal OSHA Regulations CFR 1910.1028 and Cal OSHA Title 8 Regulation CCR 5218.

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Employee Name (Print)

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Date

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Employee Signature

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Instructor/Trainer Name

cc: Personnel File

## 34C Lead Awareness

This safety guideline is intended to provide safety information to all Paragon employees regarding the potential effects of Lead and where lead may be found so that adequate measures can be taken to limit exposures through controls in the workplace.

*NOTE: If Paragon employees are to work in areas where a client company has identified the presence or usage of Lead, these areas will be disclosed to Paragon and determined to be safe before Paragon officers will be permitted to conduct tours or enter the work areas. Paragon does not knowingly allow employees to work in areas where they will have exposure to high levels of Lead above established guidelines.*

### General

The objective of this guideline is to prevent absorption of harmful quantities of lead. The guideline is intended to protect employees from the immediate toxic effects of lead and from the serious toxic effects that may not become apparent until years of exposure have passed.

### Characteristics & Where It Can Be Found

To understand why lead is so hazardous, it is important to know what it is, the hazardous effects on people, and which materials do or may contain lead. Once this is understood, employees will gain a respect for the safety guidelines set forth in this policy.

### Description

Pure lead (Pb) is a heavy metal and is a basic chemical element. It can combine with various other substances to form numerous lead compounds.

### Where Lead Can Be Found

Lead can be found in:

- Old glossy paints used on walls and pipe.
- Building and roof metal support frames.

At any time the following conditions are noted that have not been disclosed prior to being awarded a contract and lead containing materials are suspect, the conditions are to be reported to the Client Company's Project Manager:

- Cracked or peeling paint,
- Visible paint dust, grindings, or shavings.



# Health Effects

## Ways in which lead enters the body

Lead can be absorbed into your body by inhalation (breathing) and ingestion (eating). When lead is scattered in the air it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed.

Hazards encountered with lead occur when:

- Inhaling lead as a dust, fume or mist.
- Ingesting lead through food, cigarettes, and chewing tobacco when handled with contaminated hands.

Lead (except for certain organic lead compounds not covered by the standard, such as tetraethyl lead) is not absorbed through your skin. When lead is scattered in the air as a dust, fume or mist it can be inhaled and absorbed through your lungs and upper respiratory tract. Inhalation of airborne lead is generally the most important source of occupational lead absorption. You can also absorb lead through your digestive system if lead gets into your mouth and is swallowed. If you handle food, cigarettes, chewing tobacco, or make-up, which have lead on them or handle them with hands contaminated with lead, this will contribute to ingestion.

A significant portion of the lead that you inhale or ingest gets into your blood stream. Once in your blood system, lead is circulated throughout your body and stored in various organs and body tissues. Some of this lead is quickly filtered out of your body and excreted, but some remains in the blood and other tissues. As exposure to lead continues, the amount stored in your body will increase if you are absorbing more lead than your body is excreting. Even though you may not be aware of any immediate symptoms of disease, this lead stored in your tissues can be slowly causing irreversible damage, first to individual cells, then to your organs and whole-body systems.

## Effects of Overexposure to Lead

### Short-term (acute) overexposure

Lead is a potent, systemic poison that serves no known useful function once absorbed by your body. Taken in large enough doses, lead can kill you in a matter of days. A condition affecting the brain called acute encephalopathy may arise which develops quickly to seizures, coma, and death from cardiorespiratory arrest. A short-term dose of lead can lead to acute encephalopathy. Short-term occupational exposures of this magnitude are highly unusual, but not impossible. Similar forms of encephalopathy may, however, arise from extended, chronic exposure to lower doses of lead. There is no sharp dividing line between rapidly developing acute effects of lead and chronic effects, which take longer to acquire. Lead adversely affects numerous body systems and causes forms of health impairment and disease which arise after periods of exposure as short as days or as long as several years.

## **Long-term (chronic) overexposure**

Chronic overexposure to lead may result in severe damage to your blood-forming, nervous, urinary and reproductive systems. Some common symptoms of chronic overexposure include loss of appetite, metallic taste in the mouth, anxiety, constipation, nausea, pallor, excessive tiredness, weakness, insomnia, headache, nervous irritability, muscle and joint pain or soreness, fine tremors, numbness, dizziness, hyperactivity and colic. In lead colic there may be severe abdominal pain.

Damage to the central nervous system in general and the brain (encephalopathy) is one of the most severe forms of lead poisoning. The most severe, often fatal, form of encephalopathy may be preceded by vomiting, a feeling of dullness progressing to drowsiness and stupor, poor memory, restlessness, irritability, tremor, and convulsions. It may arise suddenly with the onset of seizures, followed by coma, and death. There is a tendency for muscular weakness to develop at the same time. This weakness may progress to paralysis often observed as a characteristic “wrist drop” or “foot drop” and is a manifestation of a disease to the nervous system called peripheral neuropathy.

Chronic overexposure to lead may result in kidney disease with few, if any, symptoms appearing until extensive and most likely permanent kidney damage has occurred. Routine laboratory tests reveal the presence of this kidney disease only after about two-thirds of kidney function is lost. When overt symptoms of urinary dysfunction arise, it is often too late to correct or prevent worsening conditions, and progression to kidney dialysis or death is possible.

Chronic overexposure to lead impairs the reproductive systems of both men and women. Overexposure to lead may result in decreased sex drive, impotence and sterility in men. Lead can alter the structure of sperm cells raising the risk of birth defects. There is evidence of miscarriage and stillbirth in women whose husbands were exposed to lead or who were exposed to lead themselves. Lead exposure also may result in decreased fertility and abnormal menstrual cycles in women. The course of pregnancy may be adversely affected by exposure to lead since lead crosses the placental barrier and poses risks to developing fetuses. Children born of parents either one of whom were exposed to excess lead levels are more likely to have birth defects, mental retardation, or behavioral disorders or to die during the first year of childhood.

Overexposure to lead also disrupts the blood-forming system resulting in decreased hemoglobin (the substance in the blood that carries oxygen to the cells) and ultimately anemia. Anemia is characterized by weakness, pallor and fatigue because of decreased oxygen-carrying capacity in the blood.

## **Exposure Guidelines**

Permissible Exposure Limit (PEL) - The current Cal/OSHA lead standard is 50 µg/m<sup>3</sup> as an 8-hour Time Weighted Average (TWA). The standard as it applies to construction is unique in that it groups tasks presumed to create employee exposures above the PEL of 50 µg/m<sup>3</sup> as an 8-hour TWA, as follows:



## Lead-Related Construction Tasks & their 8-hour TWA Exposure Levels

> 50 to 500 µg/m <sup>3</sup>	> 500 µg/m <sup>3</sup> to 2,500 µg/m <sup>3</sup>	> 2,500 µg/m <sup>3</sup>
Manual demolition	Using lead-containing mortar	Abrasive blasting
Dry manual scraping	Lead burning	Welding
Dry manual sanding	Rivet busting	Torch cutting
Heat gun use	Power tool cleaning without dust detection systems	Torch burning
Power tool cleaning with dust collection systems	Cleanup of dry expendable abrasive blasting jobs	
Spray painting with lead paint	Abrasive blasting enclosure movement and removal	

**Action Level** - The standard also establishes an action level of 30 micrograms per cubic meter of air (30 µg/m<sup>3</sup>), time-weighted average, based on an 8-hour workday. The action level initiates several requirements of the standard, such as exposure monitoring, medical surveillance, and training and education.

**Evaluation Process** - The Client Company's Project Manager is to provide Paragon with results of any evaluation processes and a listing of lead containing material that are use at the facility/site. The Client Company will provide all precautions and render the area safe for Paragon employees before officers are permitted to patrol or enter areas where lead is being used or is present.

## Personal Protective Measures

Paragon employees are not permitted to work in or enter areas where there may be a potential for Lead exposure above established guidelines or acceptable limits where work is being performed by Client or Contractor personnel or where areas are posted/designated as regulated areas.

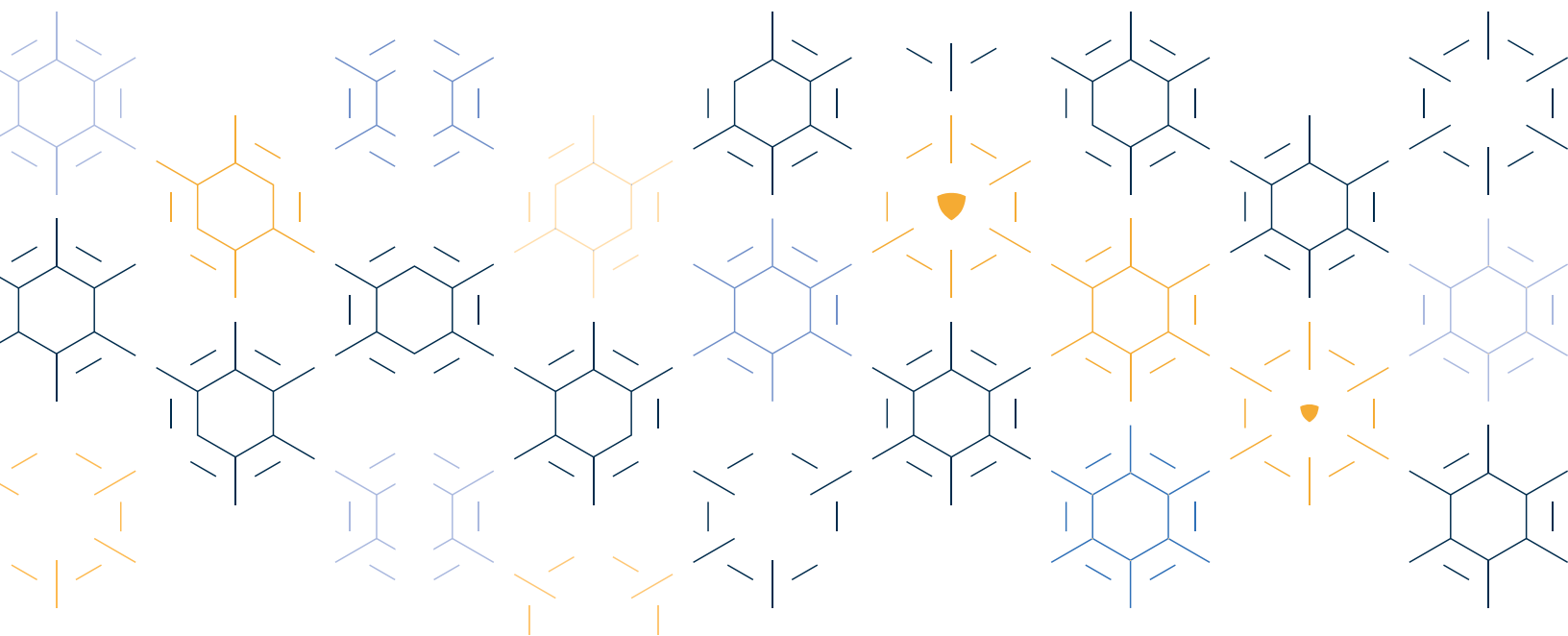
- DANGER
- LEAD
- MAY DAMAGE FERTILITY OR THE UNBORN CHILD
- CAUSES DAMAGE TO THE CENTRAL NERVOUS SYSTEM
- DO NOT EAT, DRINK OR SMOKE IN THIS AREA

Work conditions that could result in exposures above guidelines may include:

- Welding, burning, or torch cutting as part of construction or demolition projects, indoor or outdoor industrial facility maintenance and renovations where a coatings/layers of lead have not been removed prior to work being done which may result in the lead being heated to lead containing materials melting point by torches or welding units causing the lead to become airborne.
- Manual hand scraping and sanding of lead-based paints from coated surfaces causing lead dust and paint chips which may be done during residential, commercial and institutional lead abatement projects without the use of wet-sanding wet-scraping methods, HEPA vacuuming devices, shrouded power tools, or encapsulation/removal techniques.

## Training

Paragon employees that will be working at facilities that have a potential exposure to Benzene will be provided awareness training in this program to become familiar with the potential hazards and proper safe work procedures to follow if exposed to this health hazard. If exposed to lead at or above the designated action levels or where employees may suffer skin or eye irritation resulting from lead exposure, training will include the specific hazards associated with their work environment, protective measures to be taken, the danger of lead to their bodies/reproductive systems, and their rights under the OSHA Lead Standard.



34C.1 LEAD AWARENESS TRAINING ACKNOWLEDGEMENT

PARAGON

I acknowledge that I have received information and training on Lead Awareness as required per Federal OSHA Regulations CFR 1910.1025 and Cal OSHA Title 8 Regulations CCR 1532, CCR 5198, and CCR 1532.1.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

cc: Personnel File

## 34D Hydrogen Sulfide Awareness

This safety guideline is intended to provide safety information to all Paragon employees regarding the potential toxic effects of Hydrogen Sulfide (H<sub>2</sub>S) so that adequate measures can be taken to limit exposures through controls in the workplace.

*NOTE: If Paragon employees are to work in areas where a client company has identified the presence or usage of Hydrogen Sulfide, these areas will be disclosed to Paragon and determined to be safe before Paragon officers will be permitted to conduct tours or enter the work areas. Paragon does not knowingly allow employees to work in areas where they will have exposure to high levels of H<sub>2</sub>S above established guidelines.*

### General

Hydrogen sulfide is ever present in all refineries. In addition, it is generated in many industrial processes as a by-product and occurs during the decomposition of organic matter containing sulfur.

### Characteristics

Hydrogen sulfide (H<sub>2</sub>S) is a colorless gas that at low concentrations has the odor of rotten eggs. At high concentrations, it kills your sense of smell.

- Formula: H<sub>2</sub>S
- CAS No.: 7783-06-04
- Permissible Exposure Limit (PEL): There is no PEL 8-hour time weighted average
- Ceiling Concentration: 20 ppm concentration maximum per an 8-hour shift
- Short Term Exposure Limit (STEL): 50 ppm for a maximum 10-minute period once only during and 8 hour period if no other measurable exposure occurs.

H<sub>2</sub>S is a highly flammable and extremely toxic gas that can form an explosive mixture with air over a wide area.

When ignition occurs, the combustion produces irritants and toxic gases, including sulfur dioxide (SO<sub>2</sub>). SO<sub>2</sub> has an irritating effect on the eyes and lungs and can be fatal at concentrations about 100 ppm.

H<sub>2</sub>S is heavier than air, tends to settle in low-laying areas, and is readily dispersed by wind movements or currents.

H<sub>2</sub>S attacks most metals, especially in the presence of water, forming sulfides that are usually insoluble precipitates. It is also very corrosive to plastics and tissue.

H<sub>2</sub>S dissolves in water forming a weak acid (hydro sulfurous acid).

H<sub>2</sub>S will be released when in water when agitated making it a dangerous hidden hazard.

## Health Effects

The following information outlines the symptoms of hydrogen sulfide at specific concentrations:

### 10 PPM (0.001% H<sub>2</sub>S)

- Obvious and unpleasant odor.
- Burning eye irritation.
- Permissible exposure limit is eight hours.

### 200 PPM (0.02% H<sub>2</sub>S)

- Kills smell quickly.
- Stings eyes and throat.
- Respiratory irritation.
- Death after one to two hours of exposure.

### 500 PPM (0.05% H<sub>2</sub>S)

- Dizziness.
- Breathing ceases within a few minutes.
- Requires prompt artificial respiration.
- Loss of muscle control, making self-rescue impossible.

### 1000 PPM (0.10% H<sub>2</sub>S)

- Unconsciousness at once, followed by death within minutes.

## Exposure Warning

H<sub>2</sub>S CAN PARALYZE THE SENSE OF SMELL. DO NOT USE THE SENSE OF SMELL TO DETECT H<sub>2</sub>S, although the odor can no longer be detected it may still be present in Immediately Dangerous to Life and Health (IDLH) concentrations.

## H<sub>2</sub>S Detection and Alarm Systems

In most refineries emergency employee alarms are installed to meet the regulatory standards. The alarms provide warning for the necessary emergency action according to the site emergency action plan and provide time for employees to safely escape from the workplace or the immediate area. Systems are also used on drilling locations, offshore platforms and produce H<sub>2</sub>S, and some plants. It is not readily used on land production leases. Signs are and should be posted stating the presence of poison gas and urging caution.

- WARNING HAZARDOUS AREA
- HYDROGEN SULFIDE
- EXTREME HEALTH HAZARD
- FATAL OR HARMFUL IF INHALED

## Warning Conditions

There are three conditions that personnel must be aware of when working around H<sub>2</sub>S. The following information identifies the level of danger and alarms associated with each condition:

### Condition Green

- Possible Danger
- No Alarms

### Condition Yellow

- Moderate Danger
- H<sub>2</sub>S to 50 ppm
- Intermittent Audible Alarm and Yellow Flashing Light

### Condition Red

- Extreme Danger
- H<sub>2</sub>S at 50 ppm or Above
- Continuous Audible Alarm and a Red Flashing Light

## Hydrogen Sulfide Detection Devices

Fixed H<sub>2</sub>S detection devices (monitor and indicator) are designed to detect H<sub>2</sub>S concentrations in air and established Time Weighted Average (TWA) of 10 ppm and STEL (15 ppm). Which are well below the maximum ceiling and STEL exposure guidelines.

The alarm system should be capable of being perceived above the ambient noise or light levels in the affected area. The alarm should be distinctive and recognizable as a sign to evacuate the area and to start emergency status emergency procedures.

## Personal Monitors

Personal monitors are available in many types. They are designed with the employee's safety in mind. Familiarize yourself with the equipment available at your current work assignment.

## Plant Monitors

Plant monitors are available in many types and are designed with the employee's safety in mind. Employees are to familiarize themselves with the equipment available at their current work assignment.

In order to respond effectively in an emergency situation, every individual at the site should know their specific responsibilities. Whether or not an individual has an assigned duty, each individual should know what to do should an emergency situation occur.

## Evacuation

Follow these procedures in the event of a hydrogen sulfide release that requires evacuation:

- Hold your breath and quickly leave the area containing H<sub>2</sub>S. Do not inhale.
- Move quickly to the upwind “Safe Breathing Area” to receive instructions.
- Always be conscious of the wind and constantly monitor wind direction. Wind socks and streamers show which direction the wind is blowing so that you can determine the proper direction to be taken to get to a safe breathing area.

## SCBA Escape

- When in an area, on some client’s premises, which has required you to be trained to use or wear an escape respirator such as an SCBA, put on your SCBA and help anyone who appears to be affected by the gas.
- Before taking off your make, ensure that the air you will breathe is safe.
- Always be conscious of the wind and constantly monitor wind direction. Wind socks and streamers show which direction the wind is blowing so that you can determine the proper safe breathing area.

## Emergency Rescue and First Aid Warning

To prevent risk and injury to other personnel, re-entry into an area of unknown concentration of H<sub>2</sub>S will require the use of self-contained breathing equipment and backup personnel. Paragon officers will not perform emergency rescue unless the service is contractually agreed upon and only after documented training has been received and respiratory protection requirements have been completed. If approved, the following steps are to be taken:

- Wear a full rescue unit (minimum 30-minute SCBA apparatus) before attempting a rescue.
- Remove the victim immediately to fresh air.
- If breathing, maintain the victim at rest and administer respiration immediately.
- If the victim is not breathing, start artificial respiration immediately.
- Call an ambulance and get the victim medical treatment.
- Keep the victim lying down with a blanket or coat under the shoulders to keep airway passage open. Conserve the victim’s body heat and do not leave the victim unattended.
- If the eyes are affected by H<sub>2</sub>S, wash them thoroughly with clear water. For slight eye irritation, cold compresses are helpful.
- A victim should not return to work until authorized to do so by a physician, even if the victim has had minor exposure and has not completely lost consciousness.

## Personal Protective Equipment (PPE)

Depending on the exposure i.e., the amount of gas in the air and the type of work, employees will be required to wear different levels of PPE. Examples of protection include:

- When the exposure level is near or above 10 ppm, personnel will be required to wear self-contained fresh air gear.



- Wear chemical goggles or a face shield when eye contact with this material is possible.
- Avoid skin contact. Wear proper clothing such as impervious gloves, long sleeves, apron, and boots.

## Ventilation

Adequate general and local exhaust ventilation is to be used to keep atmospheric vapor concentrations below the occupational exposure limits.

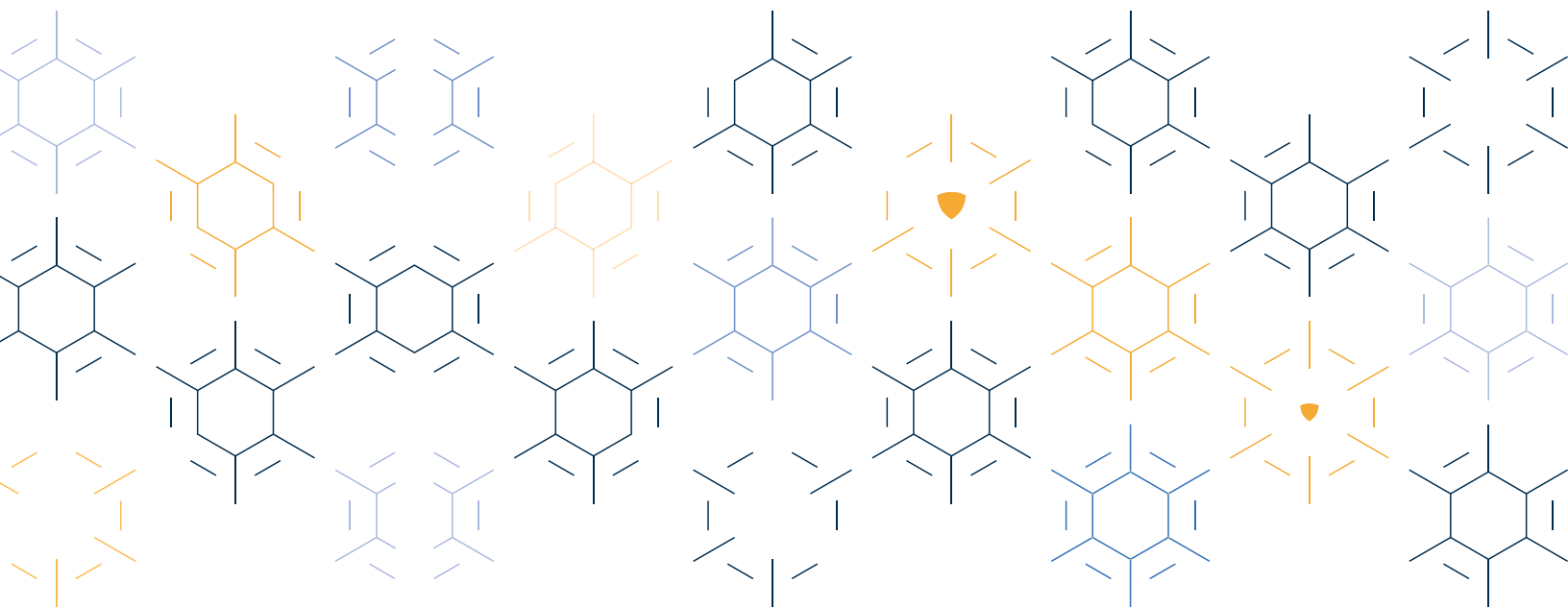
## Eyewash and Safety Showers

Safety showers and eyewash stations must be available in the vicinity of a potential exposure to H<sub>2</sub>S. Personnel are to familiarize themselves with the location of these safety device locations before starting to work within the facility.

## Personal Protective Measures and Training

Paragon employees are not permitted to work in or enter areas where there may be a potential for H<sub>2</sub>S exposure above established guidelines or in areas that are posted as regulated areas with signage.

Paragon employees that will be working at facilities or in areas that have a potential exposure to H<sub>2</sub>S will be provided awareness training in this program to become familiar with the governmental H<sub>2</sub>S regulations, how to detect the potential hazards and proper safe work procedures to follow if exposed to this health hazard. The training will be provided prior to working in any areas with potential exposure to H<sub>2</sub>S operations



34D.1 HYDROGEN SULFIDE AWARENESS TRAINING  
ACKNOWLEDGEMENT

PARAGON

I acknowledge that I have received information and training on Hydrogen Sulfide Awareness as required per Federal OSHA Regulations 29 CFR 1910 Subpart H and Subpart Z, and Cal OSHA Title 8 Regulations CCR 8424, CCR 5157, and CCR 5189.

\_\_\_\_\_  
Employee Name (Print)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Instructor/Trainer Name

cc: Personnel File



## SECTION 35

# Foot Patrol Safety

# Foot Patrol Safety

## Introduction

It is the policy of Paragon to provide a, safe and healthy workplace for all employees. To achieve this goal, whenever officers are assigned to client locations where officers are required to make foot patrols in and around client facilities the use of safe patrol practices and procedures are to be established and followed at all times.

## Company Responsibilities

Prior to beginning an assignment at a client site, a complete site risk assessment is to be conducted to evaluate the hazards and risks of performing foot patrols throughout the facility. Establishment of designated patrol routes to be conducted by security officers should be created and approved by both the client and Paragon. Employees are to be properly trained on how to safely accomplish the agreed upon assigned patrol routes and tasks to be performed while conducting the patrols as required under the contract for security services between Paragon and the client.

## Employee Responsibilities

Employees must take responsibility for their own safety as well as the safety of their co-workers. They should immediately notify their supervisor of any workplace conditions that they feel impair their ability to work safely while performing foot patrols.

## Patrol Techniques

Officers are to wear comfortable, properly fitted shoes or boots with sturdy rubber slip resistant soles to ensure good traction for all types of surface conditions that may be encountered. Shoes or boots are to be replaced when the treads/soles become worn. The foot gear should be comfortable enough to be worn for an entire shift. Shoe and boots are to be properly tied/fitted to give maximum ankle support which will help to minimize twisting and ankle injuries.

Officers are to keep the designated patrol routes unpredictable during a shift. Changing the timing of the intervals and the direction taken on the patrol, or even periodically backtracking should be done so it will not be easily predicted by intruders. During their planning intruders will often watch their target closely from a distance, make notes of routine patrols to know when to plan their theft and what amount of time they have until officers will be retuning. The more unpredictable the patrol routes are, the safer Officer patrols will be as the intruders will not be sure where officers will be at any given time making a good deterrent for a crime to occur.

When approaching corners, officers should approach slowly, give them a wide birth, and glance around the corner to make sure there are no vehicles approaching or that no one is standing just around the corner out of sight, or coming toward them so that officers will not be caught off guard. If dark, officers should flash a flashlight around every corner before proceeding around it.

While making patrols officers should periodically stop, stand still and just look and listen. This will eliminate the noise from clothing and footsteps so unordinary sounds can be heard and will allow officers to notice any movement within view to be seen that would be difficult to see while moving. If nothing is determined, then carefully proceed on the patrol route.

Flashlights or spotlights are to be used by officers making patrols afterhours or while patrolling in facilities with poor lighting. The following precautions should be taken by officers while using flashlights or spotlights:

- Always check to make sure the flashlight or hand-held spotlight are working properly and charged or has good batteries with full lighting capabilities before going on patrol.
- Make sure the flashlight or spotlight is rated for the atmosphere that it will be used in. If in a chemical plant, refinery, or chemical distribution center, routes may be through electrically classified areas because of the potential of flammable or combustible chemicals being released above their flashpoint. This requires that electrically rated flashlights or spotlights be used to prevent a possible ignition source.
- The safest use of a flashlight or spotlight would be to walk well lighted patrol routes and to use the flashlight or spotlight to highlight and check dark areas on either side of the route.
- If needing to check or walk in areas that are not well lighted, extreme caution is to be used at all times. Slow down, stop and highlight the area that is going to be entered including the floor or ground for any trip hazards, holes, uneven surfaces, wet surfaces, icy areas, protruding items sticking up from the floor or ground (e.g. bolts, roots) and any overhead items (e.g. duct work, piping, structural steel, tree limbs). Then pick the route that is free of any hazards and proceed slowly and carefully to avoid any hazards noted and keep the flashlight or spotlight pointed towards the walking route at all times and stopping frequently to check new areas being entered.
- Officers are not to multitask while using a flashlight or spot light. If needing to document anything, answer a radio or phone, etc. officers should stop any movement and not proceed until full attention can be given to where they are walking.

While making foot patrols there are many scenarios that are to be considered. Each scenario needs to be addressed with safety of the officer being the first and primary consideration.

While on foot patrols one of the biggest dangers to officers' safety are slips, trips, or falls (STF) while using stairs, or traversing steps, ramps, and curbs. STFs occur both indoors or outdoors, and taking some of the following precautions will greatly reduce STF incidents from occurring by officers while on patrols:

- Always keep one hand free and use the handrails. Do not carry anything while using stairs that prevents having one hand free.
- If any handrails or steps/stairs along a designated patrol route are not in good condition or are covered with grease, oil, heavy dust, debris, water, ice, or snow avoid the hazard, take a different route and contact your supervisor, show supervisor where the hazard is located so management can request that the hazard be taken care of, and fellow officers at the site can be informed of the hazard and what precautions to take until the hazard has been eliminated.
- Do not look at paperwork or tablets while using stairs in anticipation of what is to be done next or where you have to go. Wait until you have reached the bottom or top of the stairs and then look at the instructions. If bar codes are immediately at bottom of stairs, move them away from stairs so you are not anticipating needing to swipe them immediately and not paying full attention to using the stairs safely.

- Never be in a hurry and never multitask when using stairs. Tasks like talking on the phone or radio, talking to someone takes your mind and attention off what you are doing. Always pay very close attention to your foot placement on the stairs, don't look up or away from the stairs when using them.

Performing foot patrols in parking lots, parking ramps, and parking garages present many safety hazards including slips, trips, and falls as well as being struck by vehicles. Below are some precautions that should always be taken by officers whenever conducting foot patrols in these areas:

- Officers are to always wear a highly visible brightly colored safety vest that is safety orange, safety yellow/lime green in color when conducting patrols to make them more visible to drivers. If patrolling in early morning, at dusk, during cloudy/overcast days, during inclement weather, after dark, in areas of parking lots that are poorly lighted, or lighting is burned out, or in parking ramps with limited lighting, the vest should have reflective striping to make officers more visible in low light conditions. If patrolling after dark, officers are to always carry a flashlight that is turned on to enable the seeing of STF hazards and to make them more visible to drivers.
- Wherever possible officers are to conduct patrols from safe pedestrian walkways or around the edges of the parking lot instead of walking in the traffic pathways. If there is no walkway around the edges of the parking lot, officers are to make sure the walking areas are smooth and are free of clutter, debris, tall grass etc.
- While patrolling these areas officers are not to multi-task e.g. looking at paperwork or a vision tablet, using a phone or radio, texting etc. Officers should pay very strict attention to where they are walking at all times, looking for vehicular traffic, uneven surfaces, pot holes, large cracks, rocks, wet surface areas, muddy areas, standing water, oily areas, and in winter months icy and snow-covered areas.
- If no pedestrian walkways are available, officers are not to walk in the middle of the traffic roadway. Officers are to walk on the side of the normal traffic direction facing the oncoming-traffic so officers can be seen by oncoming vehicles and not walk with their backs to the oncoming traffic.
- Officers are to take extra precautions when needing to cross over vehicular traffic roadways that may intersect/crisscross the parking lot, around curves in parking ramps, or whenever crossing entrances. Officers are always to stop and check in all directions for traffic movement and then proceed with extreme caution.
- If Officers must walk in the traffic roadways, they should pay strict attention to persons walking to their vehicles, or for vehicle back up/brake lighting, slow down and go to the side of the roadway from where the vehicles will be backing out, and then stop and wait for the vehicle to back out before proceeding on the patrol. This will greatly minimize the possibility of being backed into or being struck because the driver is looking in the wrong direction or did not see the officer while backing up. Officers should proceed only when driver has pulled away and only after closely checking for any other approaching vehicular traffic.

While making patrols during daylight officers are to be aware of debris on the ground from construction, renovation, or damages from inclement weather, sharp objects on walking surfaces such as nails, screws, sharp rebar, shards of broken glass, or sharp pieces of metal can pierce the soles or sides of shoes or boots. Officers should use the following precautions to minimize potential foot punctures:

- Use extreme caution when walking on any surfaces that may be covered with sharp objects.

- If debris is encountered, STOP, if possible walk around it or take another known route, DO NOT try to walk through the area, or try to step over the objects.
- Special precaution is to be used when walking in construction, demolition, or debris strewn areas after a storm. Many times, boards with nails sticking up or broken glass may be hidden from view by other objects.
- If lighting is poor or not on, construction or demolition areas should not be entered until lighting is repaired or returned to full operation, so hazards can be seen.
- Extreme caution should be used by officers whenever approaching a new hazard and officers are to pay close attention to where they place their feet while walking. Officers are not to multitask as they proceed through the area.
- If officers feel an area/operation presents a potential hazard to their feet, or there is a new operation that has not been evaluated for safety hazards, they should notify your supervisor immediately, so the hazard can be addressed, and other officers can be alerted to the new hazards.

Elevators inside facilities used for personnel and freight present specific safety hazards to officers while patrolling. If foot patrols through a facility include the use of elevators the following things need to be considered:

- Whenever using a personnel elevator, after pushing the elevator directional button, when it arrives officer are to stand aside for any exiting passengers. If an elevator is full, they should wait for the next car.
- When entering or exiting the personnel elevator officers are to carefully look to determine if elevator stopped at right height before stepping into or out of the elevator
- Upon arrival at the desired floor officers are to stand clear of the doors, keeping clothes from the opening.
- If the doors start to close before being able to exit, Officer should not try to stop closing doors with anything, including hands, feet, etc. Officers are to push and hold the DOOR OPEN button if doors need to be held open, and NOT use their hand or arm to hold or reopen the doors.
- Freight elevators are to be used for carrying freight and are not intended for personnel use except for the operator and the persons necessary for loading and unloading the freight. A freight elevator that is loaded can be dangerous, as loads may shift and entrap the riders.
- If a freight elevator is to be used by officers for personnel transport, it must be empty. Officers are NOT to enter any freight elevator that has anything in it
- As doors on freight elevators are normally guillotine type and usually have an internal raising gate extreme caution is needed while opening or closing the doors and gate. Officers are only to use the straps on the gate to open and close it while keeping hands clear at all times and are NEVER to place hands between the closing doors or gates.
- Officers are always be aware of traffic when exiting a freight elevator if being used during normal operations at a site. Fork truck traffic can be waiting to use the elevator at any time, and if carrying a load would not always be looking for pedestrians exiting or entering the elevator.

While making patrols through office or building areas officers are to be aware of hazards such as electrical cords across aisles, loose rugs or rugs with turned up edges, carpeting that is in poor condition with holes or is wrinkled, or stairs with broken or loose steps, worn or torn carpeting. Wet or slippery flooring inside facilities is a serious STF hazard and can result from any of the following



conditions which require the officer to be more aware of their surroundings and to take extra precautions while making the patrol:

- Janitorial service washing and waxing the flooring;
- Water from leaks in piping, or leaks in roofing, or rain/snow coming through broken windows;
- Water from foot gear after coming in from the outdoors when it is raining, sleeting, or snowing;
- Rugs inside doorways that have soaked up rain or melted snow causing water to be on the floor or wetting foot gear;
- Water on floors in restrooms that results from dripping hands by wash basins, overflowing urinals or toilets, sweating pipes;
- Water on the floor in food/drink dispensing areas
- Oil or grease on flooring in cooking or manufacturing areas

As many patrols include both exterior and interior areas, the transition between outdoor lighting and interior lighting and exterior and interior surface conditions create specific hazards and officers are to take the following precautions to minimize the potential for STFs:

- Officers should never be in a hurry when reentering a building after being outdoors. Whenever entering a building on days when sun is bright, officers should take several seconds to let their eyes adjust to interior lighting before proceeding into the building so any wet flooring conditions or hazards can be seen;
- Officers are to be aware of janitorial services working in areas of the building, watch for signage to indicate wet flooring, and note newly waxed/polished areas as these areas can become extremely slippery if water or a beverage is spilled upon them or tracked in by wet shoes;
- Officers are not to multitask like talking on the phone or a radio, looking at paperwork or a tablet, or talking to someone. This takes their mind and attention off of what they are doing. They are to always pay very close attention to floor conditions, whether wet or dry, and their foot placement upon building entry. If needing to look at paperwork etc., do so after safely inside and in a safe area off to the side of the entrance, then proceed with caution.
- Before entering internal areas of the building where water could be present make sure to turn on lighting or at a minimum use a flashlight to make sure any area with wet flooring can be detected and proceed around or through areas with extreme caution or do not enter the area if wet surfaces are noted;
- If wet, oily or grease covered areas are noted, if possible officers are to take a different route vs. walking through the area and are to contact their supervisor and indicate where the hazard is located so management can request that the hazard be taken care of, and also so fellow officers at the site can be informed of the hazard and what precautions to take until the hazard has been eliminated.

Inclement weather occurs at all times of the year making foot patrols hazardous as conditions can change quickly. Heavy rain storms can cause slippery/muddy conditions, and each year with first snow or freezing conditions and subsequent snow falls during the winter months, the number of Slip, Trip or Falls (STF) and injuries increase. Inclement weather conditions cannot be avoided, but taking the following extra precautions while on foot patrols can help officers avoid a STF:

- Officer should wear slip resistant soled shoes or boots with an aggressive sole. Wearing flat soled footwear is asking for a STF to happen because they provide no traction.

- When patrol routes become muddy with standing water or slippery/icy or snow covered, if possible officers should avoid walking through the areas and take another route. Officers are to note the areas where walking conditions have become unsafe. If the area cannot be avoided, officers are to proceed with extreme caution, not be in a hurry, should take their time, pay close attention to where they are going and stepping. Officers should not walk normally but should walk slowly taking short deliberate shuffle type steps with toes pointed slightly outward, taking one step at a time making sure of solid footing before taking the next step, and avoid making sharp directional changes by taking wide turns at corners.
- If patrol routes or post areas become snow covered and icy, contact management immediately. Discuss the options and allow supervision to contact the client to get the hazards eliminated and/or see if a patrol route can be changed to eliminate exposure to the hazards until they have been removed.
- When ramps and stairs become wet during rain storms or snow/ice covered officers should try to avoid using them. If they must be used during rain or snow storms, officers are to always use the handrails and use extreme caution until snow has been removed and they have been salted.
- Door mats are normally at all entry points to adsorb water. Officers are to make every effort to rid their shoes of snow by stamping on the floor and/or wipe shoes thoroughly to minimize moisture. Based on the amount of foot traffic, the floors around mats may be wet around the entry and officers should take extra precautions as they proceed into the building. If door mats become saturated, officers are to notify management to have them replaced with dry ones.

## Summary

Foot patrols are a major portion of the security environment, and the potential for officer injury while performing patrols is always present. Officers can perform their patrols safely and reduce the risk of injury by: being aware of their surroundings at all times while on patrol, using proper techniques to minimize exposure, looking for and avoiding hazards, and following the proper safety precautions.



## SECTION 36

# Forklift Safety

# Forklift Safety

## Purpose

Accidents resulting from operating powered equipment can result in severe personal injury or death and major damage to client property. This program establishes uniform requirements to make sure that hazards associated with the use of forklifts are evaluated, and that this information is transmitted to all affected workers.

## Assignment of Responsibility

### Management

Paragon has expressly authorized \_\_\_\_\_ (*insert name*) the authority to halt any operation of forklift equipment where there is danger of serious personal injury.

\_\_\_\_\_ (*insert name*) will ensure that the requirements of this program for powered industrial trucks will be adhered to by all company personnel. \_\_\_\_\_ (*insert name*) is responsible for addressing employee training, authorization of use, and safety requirements. The client will be responsible for all maintenance, to include fueling the equipment.

The Safety Director is the sole person authorized to update, edit and amend this safety program.

### Employees

It is the responsibility of all employees to:

- Understand and adhere to the procedures outlined in this forklift safety program and recognize that failure to do so will result in disciplinary actions up to and including termination.
- Notify management of any unsafe or hazardous conditions or practices that may cause injury to either themselves or any other employees.
- Report any incident that causes injury to an employee, regardless of the nature or severity of the injury.
- Report any incident that causes damage to any company or client owned property.

### Determination of Needs

Every employee assigned to operate a forklift will be certified to operate a forklift. Employees will not be allowed to operate forklifts, except for training, unless they have met all training requirements.

### Safe Operation

Forklifts must not be driven up to anyone standing in front of a bench or other fixed objects.

Employees are not allowed to pass under the elevated portion of any truck, whether loaded or empty.

Personnel are not allowed to ride as passengers on forklifts. Nor are they permitted to provide rides to Paragon employees, or any other persons.

Operators must keep their arms and legs inside the running lines of the forklift during operation. At no time should operators place their arms or legs inside the uprights of the mast.

When a forklift is left unattended, the forks must be fully lowered, controls shall be in neutral, power must be shut off, and brakes set. Wheels are to be blocked if the forklift is parked on an incline.

Forklifts shall not be used for opening or closing freight doors.

A safe distance must be maintained from the edge of ramps or platforms while on any elevated dock or platform. All grades will be traversed slowly to maintain control of the forklift and its load.

Do not leave forklifts idling unnecessarily inside buildings or outside near windows or ventilation intake ducts.

## **Traveling**

Paragon employees must never leave client property when operating a forklift.

Operators will observe all traffic regulations, including posted site speed limits.

The forklift operator is responsible for looking out for pedestrians and will sound the horn when approaching pedestrians.

A safe distance must be maintained of approximately three truck lengths from other vehicles and pedestrians.

Do not pass other vehicles traveling in the same direction at intersections, blind spots, or other dangerous locations.

Drivers are required to slow down and sound the horn at cross aisles and other locations where vision is obstructed. If the load being carried obstructs forward view, the driver will travel with the load trailing.

When ascending or descending grades more than 10 percent, loaded forklifts must be driven with the load upgrade.

Dock board or bridge plates are to be properly secured before they are driven over, and their rated capacity not exceeded.

Operators should never drive a forklift into an elevator.

When transporting material, the load is to be kept no more than 6-10 inches off the floor and proper caution used when turning.

## **Loading**

All loads are to be stable or safely arranged prior to moving. Extreme caution will be taken when handling off-center loads which cannot be centered.

Heavy, odd, shaped objects will be loaded with the center of gravity as low as possible.

Loads will never be allowed to exceed the rated capacity for the forklift.

Extreme caution will be used when tilting the load forward or backward, particularly when high tiering of loads.

## Maintenance

Any forklift not in safe operating condition shall be tagged out of service and removed from the work area until all repairs have been made by authorized personnel. At that time the forklift may be placed back into service. **No Paragon employee will provide repairs or maintenance to the equipment.**

Prior to use, safety checks will be performed. Defects are to be reported and corrected before the forklift is used. (See safety checklist.)

## Required Operator Training

Employee operator trainees may operate a powered industrial truck only under the direct supervision of designated persons who have the knowledge, training, and experience to train and evaluate operator competence. New employee operators with previous experience or training will undergo the same training as other employee operators.

Training will consist of a combination of formal instruction, practical training, and evaluation of the operator's performance in the workplace.

All training and evaluation will be conducted by an approved third party qualified to provide certification or by other persons who have the knowledge, training, and experience to train and evaluate forklift operators as designated by the company.

## Training Program Content

Certified forklift operators will demonstrate their understanding of the following

- Operating instructions, warnings, and precautions for the type of forklift the operator will be authorized to operate
- Forklift controls and instrumentation: where they are located, what they do, and how they work
- Engine and motor operation
- Steering and maneuvering
- Visibility (including restrictions due to loading)
- Fork operation, and use limitations
- Vehicle capacity and stability
- Vehicle inspection that the operator will be required to perform
- Operating limitations
- Surface conditions concerns where the vehicle will be operated

- Composition of loads to be carried and load stability
- Load stacking, and un-stacking
- Pedestrian traffic in areas where the vehicle will be operated
- Narrow aisles and other restricted places where the vehicle will be operated
- Hazardous locations where the vehicle will be operated
- The risks of ramps and other sloped surfaces that could affect the vehicle's stability
- Closed environments and other areas where insufficient ventilation or poor vehicle maintenance could cause a buildup of engine exhaust components (e.g. carbon monoxide)
- Determining whether the load is safe to handle
- Other unique or potentially hazardous environmental conditions in the workplace that could affect safe operation
- Any other operating instructions, warnings, or precautions listed in the operator's manual for the type of forklift that the employee is being trained to operate.

## **Refresher Training and Evaluation**

Refresher training will be required when:

- The operator has been observed operating the vehicle in an unsafe manner
- The operator has been involved in an accident or near-miss incident
- The operator has received an evaluation that reveals that the operator is not operating the truck safely
- A condition in the workplace changes in a manner that could affect safe operation of the truck

An evaluation of operator's performance shall be conducted at least once every three years.

## **Certification**

Paragon will certify each operator has been trained and evaluated as required by this program. The certification will include the name of the operator, the date of the training, the date of the evaluation, and the identity of the person(s) performing the training and evaluation.

Any employee allowed to operate a forklift, even if only occasionally, will be required to be certified before operating this equipment.

## **Fuel Handling and Storage**

No Paragon employee will be responsible for storing fuel, nor for fueling the forklift.

## **Batteries**

No Paragon employee will be responsible removing, installing, or gassing batteries.



## 36A FORKLIFT SAFETY CHECKLIST

Forklifts will be examined daily before being placed in service. If the forklift is used daily on more than one shift, it shall be inspected before each shift.

Date: \_\_\_\_\_

Forklift Identifying Number: \_\_\_\_\_ Inspected by: \_\_\_\_\_

### Items to be checked:

OK	NOT OK	
_____	_____	Tires
_____	_____	Horn
_____	_____	Back up alarm
_____	_____	Lights
_____	_____	Controller
_____	_____	Lift system, to include load limit switches, load engagement means, chains, cables, forks, etc.
_____	_____	Brakes (normal and emergency)
_____	_____	Steering mechanism intact, no excess play in steering
_____	_____	Hydraulic system intact, no leaks or fluid puddle present
_____	_____	Forklift clean, free of dirt, excess oil and grease
_____	_____	Overhead guards intact, not broken or damaged
_____	_____	All gauges working properly
_____	_____	Seat belts work properly
_____	_____	Fuel Level
_____	_____	Fuel system intact, no smell of fuel, cap in place

List any other problems found with the truck.

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Note: Any items found to be defective will require immediate notification of your supervisor and the lift will be taken out of service until repaired.



## SECTION 37

# Safe Use of Hand Trucks

## Safe Use of Hand Trucks

One of the best ways to avoid suffering a muscle strain or sprain when moving items from one place to another is to use a hand truck. The use of this tool also increases productivity and lessens the chance of dropping and damaging items.

Although hand trucks are simple tools, users must remember a few basic safety procedures:

- Use a hand truck that is appropriate for the job and the load to be carried.
- When stacking items on the truck, keep the heaviest load on the bottom to lower the center of gravity.
- Balance the load forward on the axle of the hand truck, so the weight will not be carried by the handle.
- Never stack items so high that you can't see where you're going.
- When carrying multiple boxes side by side, attempt to stagger them to "lock in" the boxes.
- Be sure the items to be transported on the hand truck are sturdy enough to be moved in this manner. Secure any bulky or awkward objects to the truck.
- Plan your route. Be aware of potential hazards to be encountered during the path of travel.
- Avoid walking backward with a hand truck. It is safer to push than to pull.
- Hand truck injuries typically occur by getting your hand pinched between the handles and a nearby stationary object, so take care when working your way through tight spaces. The use of gloves can provide extra protection.
- Always maintain a safe speed and keep the hand truck under control.
- Always park the trucks in a designated area, never in aisles or other places where they may cause a tripping hazard or traffic obstruction.



When you use a hand truck properly, it does the job and reduces the chance you'll strain a muscle or be injured. Let the truck do the work for you.



## SECTION 38

# California Workplace Violence Safety Program

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# 1. Purpose/Objective

Paragon Protective Services (Paragon) has a zero-tolerance policy for violent acts or threats of violence against our employees, applicants, clients, customers, or vendors. Paragon does not allow fighting, horseplay, threatening words, or aggressive conduct. In addition, personal weapons of any kind are strictly prohibited and not permitted on company or client premises. No employee should commit or threaten to commit any violent act against a co-worker, supervisor or manager, applicant, client/customer, or vendor; this includes discussions of the use of dangerous weapons, even in a joking manner. Any violations of this policy will result in immediate employment termination.

# 2. Application

This policy applies to all employees, applicants, clients, customers, or vendors of Paragon.

# 3. Definitions

**Emergency** - unanticipated circumstances that can be life threatening or pose a risk of significant injuries to employees or other persons.

**Engineering controls** - an aspect of the built space or a device that removes a hazard from the workplace or creates a barrier between the worker and the hazard.

**Threat of violence** - any verbal or written statement, including, but not limited to, texts, electronic messages, social media messages, or other online posts, or any behavioral or physical conduct, that conveys an intent, or that is reasonably perceived to convey an intent, to cause physical harm or to place someone in fear of physical harm, and that serves no legitimate purpose.

**Workplace violence** - any act of violence or threat of violence that occurs in a place of employment and includes, but is not limited to, the following:

- The threat or use of physical force against an employee that results in, or has a high likelihood of resulting in, injury, psychological trauma, or stress, regardless of whether the employee sustains an injury.
- An incident involving a threat or use of a firearm or other dangerous weapon, including the use of common objects as weapons, regardless of whether the employee sustains an injury.

**Type 1 violence** - workplace violence committed by a person who has no legitimate business at the worksite and includes violent acts by anyone who enters the workplace or approaches workers with the intent to commit a crime.

**Type 2 violence** - workplace violence directed at employees by customers, clients, patients, students, inmates, or visitors.

**Type 3 violence** - workplace violence against an employee by a present or former employee, supervisor, or manager.

**Type 4 violence** - workplace violence committed in the workplace by a person who does not work there but has or is known to have had a personal relationship with an employee.

## 4. Definitions Responsibilities

The following individuals are responsible for implementing our company's Workplace Violence (WPV) Prevention Plan:

Title	Name
District Directors	
Program Managers	
Other	

## 5. Employee Engagement in WPV Prevention

Paragon employee and authorized employee representative input is critical to ensure that our WPV Prevention Plan is effective.

At a minimum, employees and/or their representatives will be involved in identifying, evaluating, and correcting WPV hazards, in designing and implementing training, in reporting and investigating WPV incidents, and participating in WPV committees.

## 6. WPV Plan Implementation with Other Employers

Paragon will share this plan and its requirements with vendors, contractors, clients, and other employers to ensure that those employers and their employees understand their respective roles under this plan.

Third party employers or vendors shall share their WPV Prevention Plan with Paragon and ensure that their employees are trained on the elements detailed in the Training Section of this plan. Training of this plan prior to entering Paragon properties.

## 7. Reporting WPV Incidents

Conduct that is prohibited under this policy includes, but is not limited to:

1. Threats of any kind.
2. Threatening, physically aggressive or violent behavior, such as intimidation of, or attempts to instill fear in, others.
3. Other behavior that suggests a propensity toward violence, including threatening speech, sabotage, threats of sabotage of company property or a demonstrated pattern of refusal to follow company policies and procedures.
4. Defacing Paragon or client property or causing physical damage to the facilities.
5. Bringing personal weapons or firearms of any kind on company or client premises, in company or client parking lots or while conducting company business, to include security personnel.

Employees should report any conduct described above to a supervisor.

**Paragon does not tolerate retaliation against an employee who reports workplace violence.**



## 8. Compliance with WPV Plan

Substantial compliance with this WPV Prevention Plan includes recognition of employees who follow safe and healthful work practices, training and retraining programs, disciplinary actions, or any other such means that ensures employee compliance with safe and healthful work practices as detailed in this plan and in our company's Injury and Illness Prevention Program (IIPP).

## 9. Communication

Paragon will communicate elements of this WPV Plan frequently (quarterly at a minimum) through our various means of communication which include, but are not limited to: employee safety meetings, employee debriefs, safety committee meetings, manager meetings, postings in employee common areas, all employee emails, newsletters, etc.

These communications shall include how an employee can report a violent incident, threat, or other WPV concern to the employer or law enforcement without fear of reprisal. These communications shall also include our company's WPV investigation process, how employees will be informed of the results of an investigation, and any corrective actions the company has taken.

**Note** – See Section 14 – Post-Incident Response and Investigation for investigation procedures.

## 10. WPV Response Procedures

In the event of a WPV situation, employees will be alerted using Paragon radios, or building alarm system. Depending on the emergency, employees will be directed to evacuate the building or shelter in place in areas specified in the post orders.

Violence can arrive in the workplace in many forms. Outside criminal activity, customer/client conflicts, worker vs. worker disputes, and domestic violence are all examples of violence in the workplace.

### Concerning Behaviors or Known Threats of Violence

Acts of violence in workplaces are rarely spontaneous, and often many early warning signs of an escalating problem or concern exist. Direct and specific threats of violence are often made on social media platforms, via text message, via email, or verbally.

### Emergency Situations

If an act of violence is occurring or there is an imminent threat of violence call the local police department using 911 if/when it is safe to do so. Provide the following information:

- Client, building name and street address:
- Nature of Incident, type of weapons involved if applicable
- Location of incident (building and floor or area on property)
- Name and descriptions of persons/vehicles involved if known
- Telephone number for return call

## **Active Shooter or other Types of in-Progress Act of Violence**

If an external act of violence is ongoing around or near the facility, a facility lockdown may be required. In this situation locking all access points and preventing people from entering the facility may become necessary until the external threat has subsided and it is safe to discontinue the lockdown.

In the unlikely event that an active shooter incident is occurring, the Department of Homeland Security recommends individuals take the following actions:

### **Run - If you determine that you can reach an escape path to a safer area, then get out.**

- Be aware of your surroundings
- Be familiar with multiple evacuation routes
- Have an exit plan
- Move away from the threat as quickly as possible
- Create as much distance as possible
- Do not congregate in groups outside of the building
- Call 911 when it is safe to do so

### **Hide - If you can't evacuate, find a secure place to hide out.**

- Find barriers to prevent or slow down the aggressor from getting to you
- Turn off the lights
- Silence your phone or any other devices that could make noise
- Remain out of sight by hiding behind large objects and be quiet
- Call 911 when it is safe to do so

### **Fight – If you have no other options confront the active shooter.**

- Be aggressive, yell, and commit to your actions
- Do not fight fairly - Throw items and use improvised weapons
- Survive by any means necessary
- Call 911 when it is safe to do so

## **When Law Enforcement Arrives on Scene**

Law enforcement's purpose is to stop the Active Shooter as soon as possible. Officers will proceed directly to the area where the last shots were heard. Officers may shout commands and push individuals to the ground for safety. The first officers to arrive at the scene will not stop to help injured persons. Expect rescue teams comprised of additional officers and emergency medical personnel to follow the initial officers. These rescue teams will treat and remove any injured persons. They may also call upon able-bodied individuals to assist with removing the wounded from the premises. The following are general procedures regarding how to react when enforcement personnel arrives:

- Remain calm and follow officers' instructions.
- Immediately raise hands and spread fingers.
- Keep hands visible at all times.
- Avoid making quick movements towards officers.

- Avoid pointing, screaming, and/or yelling.
- Do not stop to ask officers for help or direction when evacuating.

## 11. Training

Paragon will provide WPV Prevention Training to employees. The training material will be appropriate in content and vocabulary to the educational level, literacy, and language of our employees. Initial WPV Prevention Training will be provided when this plan is first implemented and annually thereafter.

Training will be conducted by the Paragon training department and will include the following:

1. Our WPV Prevention Plan, how to obtain a copy, and how to participate in development and implementation of the employer's plan.
2. Requirements of our WPV Prevention Plan.
3. How to report workplace violence incidents or concerns to the company or law enforcement without fear of reprisal.
4. Workplace violence hazards specific to the employees' jobs, the corrective measures the company has implemented, how to seek assistance to prevent or respond to violence, and strategies to avoid physical harm.
5. The violent incident log.
6. An opportunity for an interactive question and answer session with a person knowledgeable about the employer's plan.

Additional training shall be provided when a new or previously unrecognized workplace violence hazard has been identified and when changes are made to the plan. The additional training may be limited to addressing the new workplace violence hazard or changes to the plan.

## 12. Identifying WPV Hazards

Regular inspections of the workplace will be conducted by a cross-functional team to include members of Human Resources, Operations, Facilities, and employees and/or employee authorized representatives to evaluate WPV hazards. These inspections will review and document unsafe work conditions, work practices, employee reports/concern.

At a minimum, inspections will be conducted when this plan is first established, after each WPV incident, and when the company is made aware of a new or previously unrecognized hazard.

## 13. Correcting WPV Hazards

WPV hazards identified by inspections, employee reports, WPV incidents, etc. will be analyzed to determine effective corrective actions or preventative measures. These corrective actions and/or preventative measures should include how employees can seek assistance to prevent or respond to violence and strategies to avoid physical harm.

Corrective actions will be assigned to the appropriate responsible party and tracked through to completion in a timely fashion in conformance with our company's IIPP.

## 14. Post-Incident Response and Investigation

Employees should report any WPV hazards, incidents or conduct described above to their supervisor, Program Manager, Human Resources Manager, or Department of Professional Development.

All reports of workplace violence will be taken seriously and will be thoroughly investigated by the HR Manager and/or the Office of Professional Development and will be treated with as much confidentiality as possible. If the company determines that workplace violence has occurred, the company will take all appropriate actions it deems necessary and appropriate under the circumstances. Such action may include, but is not limited to:

1. Suspension, termination or other disciplinary action as appropriate.
2. Removal from the premises or withdrawal of consent to enter or be present on the premises pending the outcome of an investigation and thereafter, if required.
3. Notification of security and law enforcement agencies of any threats and violent acts, and initiation of criminal arrests and prosecutions.
4. Reassignment/relocation of personnel or job duties, if required.
5. Termination of any business relationship.
6. Any other action the company deems to be necessary or required under the circumstances.

An employee who believes that he or she may have a problem that could lead to violent behavior is encouraged to use the company's confidential EAP. For further information regarding this program, please contact your HR Manager.

Employees with questions regarding this policy should contact their supervisor or Program Manager.

## 15. Recordkeeping

Records of WPV hazard identification, evaluation, and correction will be created and maintained for a minimum of five (5) years.

Training records will be created and maintained for a minimum of one (1) year and include training dates, contents or a summary of the training sessions, names and qualifications of persons conducting the training, and names and job titles of all persons attending the training sessions.

Violent incident logs will be created and maintained for a minimum of five (5) years.

Records of workplace violence incident investigations will be maintained for a minimum of five (5) years. These records shall not contain "medical information."

WPV hazard identification, training records, and violent incident logs will be made available to employees and their representatives, upon request and without cost, for examination and copying within fifteen (15) calendar days of a request.

## 16. Plan Review

This plan will be reviewed annually and revised as needed, when a deficiency is observed, and after a WPV incident.



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