



EDWARD B. O'REILLY & ASSOCIATES. AND E.B. O'REILLY SERVICING CORP.

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30 W. Highland Avenue, Philadelphia, PA 19118 Phone: (215) 242-8100

# Safety Program

EDWARD B. O'REILLY AND ASSOCIATES AND E.B. O'REILLY SERVICING CORP.

# **SAFETY PROGRAM**

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© Edward B. O'Reilly and Associates and E.B. O'Reilly Servicing Corp.  
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## **Mission Statement**

The management of this organization is committed to providing employees with a safe and healthful workplace. It is the policy of this organization that employees report unsafe conditions and do not perform work tasks if the work is considered unsafe. Employees must report all accidents, injuries, and unsafe conditions to their supervisors. No such report will result in retaliation, penalty, or other disincentive.

Employee recommendations to improve safety and health conditions will be given thorough consideration by our management team. The primary responsibility for the coordination, implementation, and maintenance of our workplace safety program has been assigned to:

Name: Andrew D’Allesandro, Safety Supervisor      Telephone: (215) 242-8100

Senior management will be actively involved with employees in establishing and maintaining an effective safety program. Our safety program coordinator, myself, or other members of our management team will participate with you or your department’s employee representative in ongoing safety and health program activities, which include:

- Promoting safety participation;
- Providing safety and health education and training; and
- Reviewing and updating workplace safety rules.

This policy statement serves to express management’s commitment to and involvement in providing our employees a safe and healthful workplace. This workplace safety program will be incorporated as the standard of practice for this organization. Compliance with the safety rules will be required of all employees as condition of employment.

Signature of CEO/President: \_\_\_\_\_ Date: \_\_\_\_\_

## Safety Policy

**Edward B. O'Reilly & Assoc., Inc. and E.B. O'Reilly Servicing Corp.** are committed to limiting the waste of human and material resources by avoiding, preventing, and reducing loss due to injury, property damage, spoilage, reduce productivity and reduced quality.

Our resource protection and resource conservation efforts must always be an integral part of every activity, every day.

The personal safety and health of each employee of this company is of primary importance. To the greatest degree possible, management will provide all mechanical and physical facilities required for personal safety and health in keeping with the highest standards.

We will maintain a safety and health program conforming to the best practices of organizations of this type. To be successful, such a program must embody the proper attitudes toward injury and illness prevention of the part of both supervisors and employees. It also requires cooperation in all safety and health matters, not only between supervisor and employee, but also between each employee and his or her fellow workers. Only through such a cooperative effort can a safety program in the best interest of all be established and preserved.

Our objective is a safety and health program that will reduce the number of injuries and illnesses to an absolute minimum, not merely in keeping with, but surpassing, the best experience of other operations similar to ours.

We recognize that the responsibilities for safety and health are shared:

- The **employer** accepts the responsibility for leadership of the safety and health program, for its effectiveness and improvement, and for providing the safeguards required to ensure safe conditions.
- **Supervisors** are responsible for developing the proper attitudes toward safety and health in themselves, and in those they supervise, and for ensuring that all operations are performed with utmost regard for the safety and health of all personnel involved, including themselves.

## **SAFETY PROGRAM**

- **Employees** are responsible for wholehearted, genuine cooperation with all aspects of the safety and health program – including compliance with all rules and regulations – and for continuously practicing safety while performing their duties.

Edward B. O'Reilly & Associates, Inc and E.B. O'Reilly Servicing Corporation are firmly committed to providing all of its employees with a safe and healthy work environment. It is a matter of company policy to provide our employees with information about hazardous chemicals on the worksite through our hazard communication program, which includes container labeling material safety data sheets (MSDS) and employee information/training.

Andrew D'Allesandro will have the overall responsibility for coordinating the hazard communication program for E.B. O'Reilly Servicing Corporation. Andrew D'Allesandro will make our written hazard communication program available, upon request, to employees, their designated representatives, the Assistant Secretary of Labor for Occupational Safety and Health, and the Director of the National Institute for Occupational Safety and Health.

### **LIST OF HAZARDOUS CHEMICALS**

Andrew D'Allesandro has compiled a list of all hazardous chemicals that will be used on the worksite by reviewing container labels and Material Safety Data Sheets. The list will be updated as necessary. It will be kept at 30 West Highland Ave., Phila, PA 19118.

### **LABELING**

All of our hazardous chemicals are properly labeled. This responsibility has been assigned to Andrew D'Allesandro

### **MATERIAL SAFETY DATA SHEETS (MSDS)**

Copies of Material Safety Data Sheets (MSDS) for all hazardous chemicals to which employees may be exposed are kept at office located at 30 West Highland Ave., Phila, PA and are readily accessible to employees in the work area during each work shift. Andrew D'Allesandro is responsible for obtaining, maintaining, and updating the file of Material Safety Data Sheets.

### **EMPLOYEE TRAINING**

Employees attend a training session on hazardous chemicals in their work area at the time of their initial work assignment.

## **SAFETY PROGRAM**

When a new type of product is introduced into a work area or the chemical composition of a product changes, Andrew D'Allesandro will review the above items as they are related to the new chemicals.

### **NON-ROUTINE TASKS**

Periodically employees are required to perform non-routine tasks. Prior to starting work on such projects, each affected employee will be informed by Andrew D'Allesandro about hazards to which they may be exposed and appropriate protective and safety measures.

### **INFORMING OTHER EMPLOYEES**

To ensure that the employees of other contractors have access to information on the hazardous chemicals at the jobsite, it is the responsibility of Andrew D'Allesandro to provide the other contractors the following information:

Where the MSDS are available:

- The name and location of the hazardous chemicals to which their employees may be exposed and any other appropriate protective measures required to minimize their exposure.
- An explanation of the labeling system used at the jobsite.

Each contractor bringing chemicals onto a jobsite must provide us with the appropriate hazard information on those substances to which our own employee may be exposed to on a jobsite.



## Company Safety Rules

These company safety rules are not intended to cover all of the possible situations you will be faced with on the job. **Edward B. O'Reilly & Assoc., Inc. and E.B. O'Reilly Servicing Corp.** are encouraging you to act in a safe and responsible manner at all times, both on and off the job.

### FIELD SERVICE

1. All accidents and injuries (no matter how minor), and any hazardous or unsafe conditions, must be reported to your supervisor immediately.
2. Horseplay, practical jokes, drinking of alcoholic beverages, or taking drugs on the job (prior to arrival) are grounds for dismissal.
3. Hard hats must be worn where required on the job site.
4. Safety or work shoes and appropriate clothing are required. No loose clothing or dangling jewelry should be worn.
5. Safety glasses must be worn when hammering, chipping, welding, burning, grinding, and when doing other work that may cause particles or irritants to contact eyes.
6. Earplugs or muffs must be worn when working on jobs with high noise levels.
7. Respirators or gauze masks must be worn when dust conditions or the presence of toxic materials require their use.
8. Wear gloves when handling rough edges, abrasive materials, or where hands are subject to cuts, punctures, or burns.
9. Scaffolding must be in safe operating condition, and used with railing, toe boards, and outriggers, if required.
10. Do not use a defective ladder. Adjust ladder to proper angle and height before using. Secure ladder at top to prevent falls.
11. Cylinder containing oxygen, acetylene, or other fuels must be secured in the upright position. Attach caps or gauges.
12. Keep sources of ignition away from flammables. Fire extinguishers are provided for emergency use. Do not tamper with or move extinguishers without authorization.
13. Electric tools, other than those that are double insulated, must be grounded before use. Check the condition of insulation, plugs, and sockets prior to using tools.
14. Make certain that safety devices are operative, and guards are placed before using power tools, machines, or equipment.

## **SAFETY PROGRAM**

15. Boom equipment should never be operated within 10 feet of overhead power lines. When operating equipment or dump trucks, check for overhead power lines prior to raising booms or dumps.
16. Lift correctly and use your legs. Keep your back straight. Obtain help when needed. Always loosed up or stretch before lifting, or after a break.
17. Good housekeeping is essential. Keep your area clean.

### **OFFICE PERSONNEL**

#### OFFICE SAFETY

1. Do not place material such as boxes or trash in walkways and passageways.
2. Do not throw matches, cigarettes or other smoking materials into trash basket.
3. Do not kick objects out of your pathway; pick them up or push them out of the way.
4. Keep floors clear of items such as paper clips, pencils, tacks or staples.
5. Straighten or remove rugs and mats that do not lie flat on the floor.
6. Mop up water around drinking fountains and drink dispensing machines.
7. Do not block your view by carrying large or bulky items; use a dolly or hand truck or get assistance from a fellow employee.
8. Store sharp objects, such as pens, pencils, or letter openers in drawers or with the points down in a container.
9. Carry pencils, scissors and other sharp objects with the tips pointing down.
10. Use the ladder or step stool to retrieve or store items that are located above your head.
11. Do not run on stairs or take more than one step at a time.
12. Keep doors in hallways fully open or fully closed.
13. Use handrails when ascending or descending stairs or ramps.
14. Obey all posted safety and danger signs.

#### **Furniture Use**

1. Open only one file cabinet drawer at a time. Close the filing cabinet drawer you are working in before opening another filing drawer in the same cabinet.
2. Use the handle when closing doors, drawers and files.
3. Put heavy files in the bottom drawers of the file cabinets.
4. Do not the chair you are sitting on its back two legs.
5. Do not stand on furniture to reach high places.

#### **Equipment Use**

1. Do not use fans that have excessive vibration, frayed cords or missing guards.
2. Do not place floor type fans in walkways, aisles or doorways.
3. Do not plug multiple electrical cords into a single outlet.

## **SAFETY PROGRAM**

4. Do not use extension or power cords that have the ground prong removed or broken off.
5. Do not use frayed, cut or cracked electrical cords.
6. Use accord cover or tape the cord down when running electrical cords across aisles, between desks or across entrance or exits.
7. Turn the power switch of the local exhaust fans to “On” when operating the blueprint machine
8. Do not use lighting fluid to clean drafting equipment; use soap and water.

### **SALES PERSONNEL**

#### **Driving Safety**

#### **Fueling Vehicles**

1. Turn the vehicle off before fueling
2. Do not smoke while fueling the vehicle.
3. Wash hands with soap and water if you spill gasoline on your hands.

#### **Driving Rules**

1. Shut all doors and fasten your seat belt before moving the vehicle.
2. Obey all traffic patterns and signs at all times.
3. Maintain a three-point contact using hands and one foot or both feet and one hand when climbing into and out of vehicles.
4. Only service vehicle personnel are permitted to operate a service vehicle.
5. Do not ride in the bed of a pick-up truck.
6. Do not drive over 5mph in the shop area.
7. Walk behind the vehicle and remove any equipment, tools, or other pathway instructions before getting into the vehicle. Sound the horn to alert nearby coworkers before backing the vehicle.
8. Tie down, lash, or secure all materials and equipment hauled in the bed of vehicles.
9. Do not mount or dismount a moving vehicle.

### **WAREHOUSE PERSONNEL**

#### **General Storeroom/Stockroom Safety**

1. Wear leather gloves when handling materials such as copper or aluminum wire.
2. Do not attempt to catch falling materials.
3. Do not try to kick objects out of pathways. Push or carry them out of the way.
4. Move slowly when approaching blind corners.
5. Do not run on stairs or take more than one step at a time.

## **SAFETY PROGRAM**

6. Do not jump from elevated places such as truck beds, platforms or ladders.
7. Do not lift slippery or wet objects; use a hand truck.
8. Visually inspect for sharp objects or other hazards before reaching into containers such as garbage cans, boxes, bags or sinks.
9. Remove or bend nails and staples from crates before unpacking the crates.
10. When cutting shrink-wrap with a blade, always cut away from you and your co-workers.
11. Straighten or remove rugs and mats that do not lie flat on the floor.
12. Use caution signs or cones to barricade slippery areas such as freshly mopped floors.
13. Obey all safety and danger signs posted in the workplace.

### **Stocking Shelves**

1. When stocking shelves by hand, position the materials to be shelved slightly in front of you, so you do not have to twist when lifting and stacking materials.
2. Place items on shelves so that they lie flat and do not wobble.
3. Place heavier loads on the lower or middle shelves.
4. Do not stack bulky merchandise on crushed boxes.
5. Do not let items overhang from shelves into walkways.
6. Remove one object at a time from shelves.
7. Do not climb the racking to stock or retrieve merchandise; use a ladder.

### **Hand Truck Operations**

1. When loading hand trucks, keep your feet clear of the wheels.
2. Do not exceed the manufacture's load rated capacity. Read the capacity plate on the hand truck if you are unsure.
3. Place the load so that it will not slip, shift or fall. Use the straps, if they are provided to secure the load.
4. For extremely bulky items, such as air-conditioning units or heating units, strap or chain the item to the hand truck.
5. Tip the load slightly forward so that the tongue of the hand truck goes under the load.
6. Push the tongue of the hand truck all the way under the load that is to be moved.
7. Keep the center of gravity of the load as low as possible by placing heavier objects below the lighter objects.
8. Push the load so that the axle, and not the handles, will carry the weight.
9. If your view is obstructed, ask a spotter to assist in guiding the load.
10. Do not walk backwards with the hand truck, unless going up the stairs or ramps.
11. When going down an incline, keep the hand truck in front of you so that it can be controlled at all times.

## **SAFETY PROGRAM**

12. Move the hand trucks at a walking pace.
13. Store hand trucks with the tongue under a pallet, shelf, or table.

### **General Hand Tool Safety**

1. Tag worn, damaged, or defective tools “Out of Service” and do not use them.
2. Do not use a tool if its handle has splinters, burrs, cracks, and splits or if the head of the tool is loose.

### **General Hand Tool Safety Continued**

3. Do not use the impact tools such as hammers, chisels, punches or steel stakes that have mushroomed heads.
4. When handling a tool to another person, direct the sharp points and cutting edges away from yourself and the other person.
5. Do not carry sharp or pointed hand tools such as screwdrivers, scribes, snips, scrapers, chisels or files in your pocket unless the tool or your pocket is sheathed.
6. Do not perform “make-shift” repairs to tools.
7. Do not throw tools from one location to another or from one employee to another.
8. Transport hand tools only in toolboxes or tool belts. Do not carry tools in your clothing.

## **ALL EMPLOYEES**

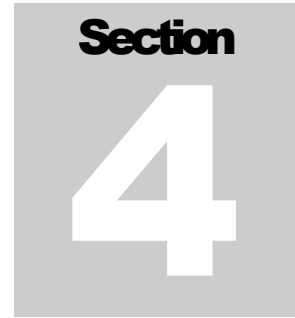
### **Ladders and Step Ladders**

1. Read and follow the manufacturer’s instructions label affixed to the ladder if you are unsure how to use the ladder.
2. Do not use the ladders that have loose rungs, racked or split side rails, missing rubber foot pads, or are otherwise visibly damaged.
3. Keep ladder rungs clean and free of grease. Remove buildup or material such as dirt or mud.
4. When performing work from a ladder, face the ladder and do not lean backwards or sideways from the ladder.
5. Allow only one person on the ladder at a time.
6. Do not stand on the top two rungs of any ladder.
7. Do not stand on ladder that wobbles, or that leans to the left or right of center.
8. Do not try to “walk” a ladder by rocking it. Climb down the ladder, and then move it.

## **SAFETY PROGRAM**

### **Climbing a Ladder**

1. Face the ladder when climbing up or down.
2. Do not carry items in your hand when you climb up or down a ladder.
3. Maintain a three-point contact by keeping both hands and one foot or both feet and one hand on the ladder at all times when climbing up or down the ladder.



## **First Aid Procedures**

### **MINOR FIRST AID TREATMENT**

First aid kits are kept on the first floor and second floor. If you sustain an injury or are involved in an accident requiring minor first aid treatment:

- Inform your supervisor.
- Administer first aid treatment to the injury or wound.
- Access to a first aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the Report of Occupation Injury or Disease. (New Claim for Workers' Compensation)

### **NON-EMERGENCY MEDICAL TREATMENT**

For non-emergency work-related injuries requiring professional medical assistance, management must first authorize treatment. If you sustain an injury requiring treatment other than first aid:

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the Report of Occupation Injury or Disease. (New Claim for Workers' Compensation)

### **EMERGENCY MEDICAL TREATMENT**

If you sustain a severe injury requiring emergency treatment:

- Call for help and seek assistance from a co-worker.
- Use the emergency telephone numbers and instructions posted next to the telephone in your work area to request assistance and transportation to the local hospital emergency room.
- Provide details for the completion of the Report of Occupation Injury or Disease. (New Claim for Workers' Compensation)

### **IMPORTANT SAFETY NUMBERS:      POLICE/FIRE – DIAL 9-1-1**

- The Poison Control Center: 3535 Market St., Suite985, Phila, PA 19104  
Emergency (800) 222-1222, Emergency TTY/TDD (215) 590-8789
- Medical Clinic: Chestnut Hill Hospital, 8835 Germantown Ave., Phila, PA 19118  
(215) 753-2000



## Fall Protection

### PURPOSE

The purpose of this program is to prevent worker injuries due to falls from elevations. It is the policy of Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. to make every reasonable measure to protect workers from job site fall hazards. Andrew D'Allesandro is the designated competent person assigned to oversee fall prevention and protection issues for Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. workers at this job site.

### ANTICIPATED FALL HAZARDS

Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. anticipates potential fall hazard from the following:

- Use of mobile scaffolds;
- Use of fixed scaffolds;
- Use of scissors lifts;
- Use of aerial lifts;
- Floor openings;
- Wall openings
- Use of straight ladders;
- Use of extension ladders; and,
- Use of stepladders.

### FALL PREVENTION AND PROTECTION MEASURES

Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. employees will use protection measures whenever they are exposed to a potential fall of six feet or more to a lower level or object:

1. **Mobile and Fixed Scaffolds:**
  - Guardrail Systems and/or
  - Personal Fall Arrest Systems
2. **Scissors Lifts:**
  - Guardrail Systems and/or
  - Personal Fall Restraint Systems
3. **Aerial Lifts:**
  - Guardrail systems and Personal Fall Restraint Systems



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### **4. Floor Holes:**

- Guardrail Systems or
- Covers

### **5. Wall Openings:**

- Guardrail Systems or
- Personal Fall Arrest Systems

### **6. Ladders: (6 foot and 4 foot height rule does not apply to ladders)**

Before working on ladders such as straight ladders, extension ladders and stepladders workers will receive safety training that will cover:

- Proper selection of ladders;
- Proper ladder set-up;
- How to safely secure ladders (where applicable);
- How to safely ascend ladders;
- How to work safely while on ladders; and,
- How to safely descend ladders.

### TRAINING

All Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. employees will receive the applicable fall protection and/or prevention training prior to the start of work at any designated construction location.

All affected workers will receive classroom training that includes:

- Awareness of the potential fall hazards that they are likely to encounter;
- The specific measure or measures that will be used to prevent falls or protect them if they do fall;
- How to properly use/implement these measures; and,
- Where to find Andrew D'Alessandro should any questions arise.

In addition, all affected workers will receive "hands-on," task-specific fall prevention and/or protection training that applies to each identified potential fall hazard.

### GUARDRAIL SYSTEMS

When guardrails are used the following requirements will be met.

- The top edge of guardrails will be 42 inches above the working surface.
- Intermediate Rails will be installed approximately halfway between the top rail and the working surface.
- For service work use Guardrails will be capable of withstanding at least 200 pounds of force applied in any direction at any point on the top rail.

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### PERSONAL FALL ARREST AND RESTRAINT SYSTEMS

Where personal fall arrest systems are used for fall protection or fall restraint systems are used for fall prevention all affected employees and supervisors will observe the following measures.

- All affected employees will use a full body harness.
- Only locking type snap hooks will be used.
- Each affected employee will receive training on how to use the system properly. The training will take place before work is started.
- The competent person will periodically inspect all personal fall arrest or restraint systems.
- Worn or damaged system parts will not be used. Such parts will be removed from service and disposed of immediately.
- All system components must be compatible.
- All affected employees will tie off to anchorage points that are identified or established by Andrew D'Allesandro.
- Deceleration devices will not be used with fall restraint systems.
- Lanyards used for fall restraint will be long enough to allow the work to be performed, but short enough to prevent workers from falling.
- All affected workers will follow the manufacturers' instruction that are specific to the lift being used with regard to the use of fall restraint systems on aerial lifts and scissors lifts.
- All components of each personal fall arrest system will be stored in a job box when not in use.

### COVERS

When covers are used for fall prevention the following requirements will be met:

- Where applicable, covers will be capable of supporting at least twice the maximum axle load of the largest vehicle that could require their support.
- All covers will be capable of supporting at least twice the weight of workers, equipment and materials that could require their support. All covers will be secured in place to prevent accidental displacement.
- All covers will be clearly marked with the word "hole." The words will be large, legible and easy to see.

Any questions regarding these fall protection measures should be directed to Andrew D'Allesandro.

## Lock Out

### INTRODUCTION

Edward B. O'Reilly & Associates Inc. and E.B. O'Reilly Servicing Corp. will be performing work on HVAC equipment. This lockout program was developed to protect the company's Authorized Employees from hazardous sources of energy while the servicing, maintenance, or construction work is being performed by establishing procedures for:

- Employee training;
- Energy control; and
- Periodic inspections of the established process.

This lockout program applies to all company employees and other employer's employees who are Authorized Employees, Affected Employees or otherwise assigned to work in close proximity to the HVAC equipment.

### EMPLOYEE TRAINING

Before the servicing, maintenance or construction work begins all employees will be trained as follows.

*Authorized Employees* — will receive training on: how to recognize hazardous sources of energy; the types of hazardous energy they could be exposed to;

- The magnitude of the energy they could be exposed to;
- The methods necessary to isolate and control potentially hazardous energy; and
- The means necessary to isolate and control potentially hazardous energy

*Affected Employees* — will receive training on:

- The presence of the energy control procedures
- The purpose of the energy control procedures; and
- The use of energy control procedures.

*All Other Applicable Employees* — will be trained on:

- the energy control procedures; and

## **SAFETY PROGRAM**

- Prohibitions against re-energizing locked out machines, equipment or processes.

*Retraining* — will be provided for Authorized and Affected Employees:

- When changes occur that present a new hazard; or
- When there is a change in the energy control procedure.

*Additional Retraining* — will be provided whenever there is concern about an employees knowledge or use of the energy control procedures.

### **LOCKOUT PROCEDURE**

#### **PURPOSE**

This procedure establishes the minimum requirements for the lockout of HVAC equipment.

#### **COMPLIANCE WITH THIS PROGRAM**

- All employees are required to comply with the restrictions and limitations imposed upon them throughout the use of the lockout procedure.
- Any employee who is found to be in violation of the procedure will be:
  - Dismissed without pay for the day (first offense); and
  - Discharged (second offense).
- Only Authorized Employees will perform the lockout in accordance with this procedure.
- No employee who observes lockout on HVAC equipment will attempt to start, energize or use it.

#### **Type(s) of Hazardous Energy**

- Electrical, Thermal, and Mechanical

#### **Magnitude(s) of the Energy**

- Voltage, Temperature, and Movement

#### **Potential Hazards**

- Electrocution, Burns, Cut, Puncture, or Scrape

#### **Methods of Control**

- Shut off power and lock it out or disconnect energy source and lock it out.

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The Authorized Employee will shut down the HVAC equipment by opening the power source and/or closing the valve, etc.

### **Type(s) of Operating Controls**

- Disconnect Switches or Shut Off Valves

Please Note: The location of operating controls vary depending on the type of equipment. The Authorized Employee will de-activate the disconnect switch, circuit breaker, or line valve.

### **Energy Isolating Device(s)**

- Disconnect Switch, Circuit Breaker or Line Valve

The Authorized Employee will lockout the (type in the energy isolating device(s)) with an individually assigned lock (one lock, one key).

The Authorized Employee will ensure that the stored or residual energy is dissipated by verifying the power source is dead.

### **Stored or Residual Energy**

- Steam, Refrigerant, or Electric

The Authorized Employee will ensure that the HVAC equipment is disconnected from the energy source(s) by:

- Checking to ensure that no one is exposed to a hazard; and
- Verifying that isolation has been achieved by attempting to operate the HVAC equipment.

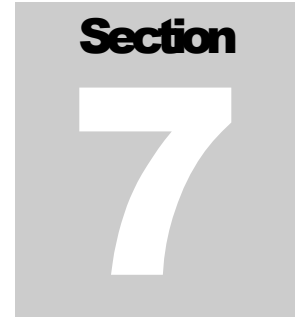
The Authorized Employee will return the operating controls back to the neutral or “off” position.

### **RESTORING SERVICE**

- The Authorized Employee will check the HVAC equipment to ensure that non-essential items have been removed and that all components are operationally in tact.
- The Authorized Employee will check the work area to ensure that all employees have been safely positioned or removed from the area.
- The Authorized Employee will verify that the controls are in neutral.
- The Authorized Employee will remove the lockout device(s) and re-energize the HVAC equipment.
- The Authorized Employee will notify affected employees that the servicing, maintenance, or construction has been completed and the HVAC equipment is ready for use.

**PERIODIC INSPECTIONS**

- An Authorized Employee other than those utilizing the energy control procedures being inspected will periodically inspect the procedures to ensure that the requirements are being followed. Periodic inspections will be performed at least annually.
- This inspector will correct any deviations or inadequacies identified during the inspection.
- The inspector will review with each Authorized Employee in their responsibilities under the energy control procedures being inspected.
- Each time a periodic inspection is conducted the inspector will document in a written report the following:
  - The name of the machine, equipment or process;
  - The date of the inspection;
  - The names of each employee involved in the inspection;
  - The inspector's name;
  - If applicable a statement that no problems were found;
  - If applicable a description of any deficiencies or inadequacies;
  - If applicable the time the problem(s) was found.
  - If applicable the time the problem(s) was corrected; and
  - If applicable a description of how the problem(s) was corrected.
- The inspector will provide the supervisor with the report as soon as possible after the inspection is completed.
- The supervisor will verify and certify that the inspection was performed.



## **Hazard Communication**

*Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. Hazard Communication Program and corresponding material safety data sheets (MSDS) are available for observation at any time by any company worker and any other job site employer at 30 W. Highland Avenue, Philadelphia, PA 19118.*

Workers who have questions about anything regarding hazard communication should direct their questions to Andrew D'Allesandro.

### **PURPOSE**

The purpose of this hazard communication program is to protect Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. workers from chemical hazards. Each worker will receive a copy of this hazard communication program during his or her initial hazard communication training session. Also during initial training workers will be informed about where the hazard communication program is kept on site. Workers will have access to the program at all times and will be provided with an additional copy at any time upon request.

### **LABELING**

Andrew D'Allesandro is responsible for ensuring that all job site containers and shipped containers of chemicals that belong to Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. are properly labeled. All labels will be written in English, identify the hazardous chemicals, state or show appropriate hazard warnings and state the name and address of the chemical manufacturer, importer or other responsible party.

Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. will rely on the suppliers' labels unless the labels have been removed or are illegible. In such cases Andrew D'Allesandro will affix appropriate stick-on labels to the improperly labeled containers. The appropriate information will be added in English to the stick-on labels, including the identity of the hazardous chemicals, hazard warnings and the name and address of the chemical manufacturer, importer or other responsible party.

## **SAFETY PROGRAM**

The chemical containers will be inspected on a regular basis by Andrew D'Allesandro to ensure that they are properly labeled and that the labels are current and legible. Containers with labels that have been removed or defaced will be immediately removed from the work area until a proper label is securely attached to the container.

When a chemical is transferred into a secondary container, the container will be properly labeled unless the contents are to be used up immediately. Andrew D'Allesandro will immediately revise the label of any chemical whenever he becomes newly aware of any significant information regarding chemical hazards.

All OSHA regulated chemicals will be labeled according to the requirements of the applicable standard.

### **MATERIAL DATA SAFETY SHEETS**

Andrew D'Allesandro is responsible for obtaining and maintaining material safety data sheets for every chemical that belongs to Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp.

Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. requires all of its suppliers to provide a material safety data sheet for each chemical that it provides to the company. Andrew D'Allesandro will verify that each chemical used by this company is recorded in the chemical information list and that there is a corresponding material safety data sheet for that substance. Each chemical in the chemical information list will have its own designated number written in the far right box of each horizontal column. Each material safety data sheet will have the corresponding chemical information list number written on the upper right hand corner of its first page. Each time a new chemical arrives at the job site and each time newly received chemical information becomes apparent Andrew D'Allesandro will update the chemical information list and material safety data sheets as appropriate.

Material Safety Data Sheets will be maintained in a three ring binder at 30 W. Highland Avenue, Philadelphia, PA 19118. Workers who need immediate access to material safety data sheets can access them by checking in the parts department at 30 W. Highland Avenue or on any service mechanic's truck.



## **SAFETY PROGRAM**

When material safety data sheets are not received from a supplier at the time of the first shipment, the following procedure will be implemented:

- The suppliers will not be paid until material safety data sheets are provided for all chemicals.
- Andrew D'Allesandro will immediately fax a letter to the derelict supplier demanding copies of all missing material safety data sheets.
- A copy of the letter will be kept on file.
- When MSDSs are not received within three weeks after issuing the first letter, the words "SECOND REQUEST" will be written in large bold print on a copy of the original letter. It will be faxed immediately to the derelict supplier.
- A copy of the letter will be kept on file.
- When MSDSs are not received within three weeks after issuing the second letter the words "THIRD REQUEST" will be written in large bold print on a copy of the previous letter. It will be faxed immediately to the derelict supplier and a copy will be sent to United States Government, Department of Labor, The Curtis Center, Occupational Safety and Health, Administration OSHA

### **WORKER INFORMATION AND TRAINING**

Andrew D'Allesandro is responsible for conducting hazard communication training for this company's workers.

#### **General**

The training format will be as follows:

- The training will be based on general hazard categories including flammability, health, corrosiveness and reactivity hazards. Specific information on each chemical will be readily accessible to all workers through container labels and material safety data sheets.
- At the initial training session each worker will receive a sample material safety data sheet and a copy of the company's hazard communication program including the completed chemical information list. These items will be used as training materials.
- Workers will view a hazard communication worker training videotape. The videotape covers:
  - The requirements of OSHA's Hazard Communication Standard;
  - The routes of entry of chemicals into the human body;
  - The methods and observations that may be used to detect the presence or release of hazardous chemicals in the workplace;
  - The physical, health, corrosiveness and reactivity hazards of the chemicals in the workplace; and

## **SAFETY PROGRAM**

- The measures that workers can take to protect themselves from the hazards, such as work practices, emergency procedures and personal protective equipment (PPE).
- Workers will participate in a lecture and be encouraged to engage in discussion on:
  - The identity of the company's contact person for worker questions or concerns regarding hazardous chemicals on the job site;
  - The location of the company's hazard communication program and material safety data sheets;
  - The contents of the company's hazard communication program, including the chemical information list;
  - The company's chemical container labeling system;
  - How to read and interpret hazard warning labels and material safety data sheets;
  - Specific job site operations where hazardous chemicals are present; and
  - How workers can obtain and use the appropriate hazard information
- At the initial training session and at each subsequent training session, workers will be encouraged to ask questions and engage in discussion about hazard communication.
- A hazard communication training session will be arranged for each new worker. Workers will receive the company's initial hazard communication training before they are permitted to start work where exposure to a hazardous chemical could occur.
- Each time a new chemical hazard is introduced into the workplace, all company workers will receive training on the identity of the new chemicals, the hazards associated with them and how they can protect themselves from the hazards.

### **Non-Routine Tasks**

- Each time it is necessary to conduct a non-routine work task where chemicals are involved, each company worker that could be exposed to a chemical hazard will receive task-specific, chemical hazard training before starting the work.
- The training will be in lecture format and participants will be encouraged to ask questions and engage in discussion about the task-specific chemical hazards and the means by which they can protect themselves from the hazards.

**MULTI-EMPLOYER WORK SITES**

- Each employer on a multi-employer work site will receive a form letter and a copy of Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. hazard communication program. The form letter will invite each employer to access material safety data sheets at any time and describe where the data sheets are maintained on the job site. The hazard communication program also states where other employers can access Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp. material safety data sheets and describes the chemical container labeling system used by the company.
- The form letter to other employers will also request that each of them provide a copy of their company's hazard communication program to Edward B. O'Reilly & Assoc. Inc., and E.B. O'Reilly Servicing Corp.

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