

TPI Inc. Worksite Safety, Employee Training, Hazard Prevention and Control Program

Management Leadership and Employee Involvement

TPI Inc. management commits the necessary resources of staff, money, and time to ensure that all persons on the worksite(s) are protected from injury and illness hazards. In addition, TPI Inc. management visibly leads in the design, implementation, and continuous improvement of site safety and health activities. Specifically, the highest level management establishes and reviews annually the site safety and health policy and ensures that all employees know, understand, and support that policy. All management levels, with input from hourly employees, develop an annual safety and health goal with objectives and action plans to reach that goal. At the end of each year all management levels, with input from hourly employees, evaluate progress in accomplishing the action plans, achieving all objectives, and meeting the annual goal. This evaluation, which also includes an evaluation of the overall safety and health program, results in a written report that includes the next year's goal, objectives, and action plans, including any remaining action needed to accomplish the current year's goal.

TPI Inc. management ensures that all employees, including themselves, have clearly written safety and health responsibilities included within their job description, with appropriate authority to carry out those responsibilities. Also, TPI Inc. management ensures that all employees, including all levels of management, receive performance evaluations that include a written evaluation of the accomplishment of assigned safety and health responsibilities.

TPI Inc. Management ensures that all visitors to the site, including contract and temporary labor, co-op students, interns, vendors, and sales people, have knowledge of site hazards applicable to them and how to protect themselves against those hazards, including emergency alarms and procedures. TPI Inc. Management also ensures that these visitors do not introduce to the site hazards that can be prevented or that are not properly controlled.

TPI Inc. Management ensures that at least several avenues exist for employee involvement in safety and health decision making and problem solving. These avenues may include serving on committees and ad hoc problem solving groups, acting as safety observers, assisting in training other employees, analyzing hazards inherent in site jobs and how to protect against those hazards (writing JHAs), and planning activities to heighten safety and health awareness. TPI Inc. Management encourages employees' involvement and devises appropriate recognition for outstanding employee participation.

Worksite Analysis

TPI Inc. Management hires outside consultants as necessary to conduct baseline surveys that identify all safety and health hazards at the site at the time of the survey. All hazards found during these surveys are eliminated whenever possible or controlled. All employees who may encounter the controlled hazards are trained in appropriate job procedures to follow to protect themselves from these hazards.

TPI Inc. Management establishes change procedures to follow whenever the site experiences changes in equipment, material, or processes. To ensure employee protection, these change procedures include consideration of safety and health in the selection of the change, equipment and process shut down procedures, start up procedures, and phase hazard analysis. Appropriate employees are trained to follow these procedures.

TPI Inc. Management and employees work together to analyze safety and health hazards inherent in each job site and to find means to eliminate those hazards whenever possible, and otherwise to protect persons against those hazards. These job hazard analyses (JHAs) are revised as appropriate, for example, following a change in the job, the reappearance of a hazard, or an accident at this job.

All employees at this site are trained to recognize hazards and to report any hazard they find to the appropriate person so that the hazard can be corrected as soon as possible. In addition to taking immediate action to report a hazard orally and to provide interim protection, if necessary, including stopping the work causing the hazard, employees may submit a safety work order to the maintenance department, or they may submit a safety suggestion form. Safety work orders take priority over any other work order. Safety suggestions are considered each week during the site inspection by TPI Inc. management. All employee reports of hazards must be eventually written, with the correction date recorded. These reports are kept on the reception desk until the hazard is corrected and then are kept on file in the owner's office for three years. During that time they are available for employee review.

TPI Inc. management performs site inspections each week, at the beginning of work on Monday morning. The team inspects the entire worksite, discussing and documenting all hazards found, including their location. The team assigns appropriate persons responsible for seeing that the hazard is corrected and documenting the date of the correction. These inspection reports are forwarded to the main office and remain on the monthly report until it is corrected.

Any near miss, first aid incident, or accident is investigated by a trained team selected each year by the owner and an hourly employee.

The team consists of two managers or supervisors and two hourly employees. All investigations have as a goal the identification of the root cause of the accident, rather than assigning blame. The accident investigation team assigns responsibility to appropriate employees for correcting any hazards found and for assigning a date by which the correction must be completed.

As part of the annual safety and health program evaluation, a manager and an hourly employee review all near misses, first aid incidents, and entries on the OSHA 300 Log, as well as employee reports of hazards, to determine if any pattern exists that can be addressed. The results of this analysis are considered in setting the goal, objectives, and action plans for the next year.

Hazard Prevention and Control

TPI Inc. Management ensures that this priority is followed to protect persons at the site: (1) Hazards will be eliminated when economically feasible, such as replacing a more hazardous chemical with a less hazardous one; (2) Barriers will protect persons from known hazards, such as machine guards and personal protective equipment (PPE); (3) Exposure to hazards will be controlled through administrative procedures, such as more frequent breaks and job rotation.

TPI Inc. Management ensures that the worksite and all machinery is cared for properly so that the environment remains safe and healthy. If maintenance needs exceed the capability of the worksite employees, contract employees are hired to do the work and are screened and supervised to ensure they work according to the site's safety and health procedures.

All employees, including all levels of management, are held accountable for obeying site safety and health rules. The following four step disciplinary policy will be applied to everyone by the appropriate level of supervisor:

- oral warning;
- written reprimand;
- administrative leave;
- dismissal.

Visitors, including contractors who violate safety and health rules and procedures, will be escorted from the site. Should the disciplined person request a review of the disciplinary action, an ad hoc committee will review the situation and make a recommendation to the owner, who reserves the right for final decision. If his decision differs from the committee, he may, within confidentiality strictures, make public his reasons.

TPI Inc. works with appropriate outside agencies, such as the fire department, the police department, and the hospital to write emergency plans for all potential emergencies, including fire, explosion, accident, severe weather, loss of power and/or water, and violence from an outside source. Desk top drills are conducted so that all employees experience a drill on each type of emergency once a year. When necessary, the emergency procedures are revised as a result of the evaluation report.

Persons needing emergency care are transported by company vehicle or community ambulance to the nearest hospital. All worksites and subcontractors are to maintain first aid kits, stocked and readily accessible in a marked location. Appropriate personal protective equipment (PPE) is provided to employees and required by subcontractors to protect against the different types of accidents possible at the site.

Training

TPI Inc. Management believes that employee involvement in the site's safety and health program can only be successful when everyone on the site receives sufficient training to understand what their safety and health responsibilities and opportunities are and how to fulfill them. Therefore, training is a high priority to ensure a safe and healthy workplace. Finding time and knowledgeable personnel to do effective training is vital. Each year TPI Inc. management pays special attention to the evaluation of the year's training efforts to look for methods of improvement.

Currently, all new employees receive safety and health orientation before they begin work. When they have learned this material, they begin their assigned job with a trained buddy. For the first day the employee only observes the buddy doing the job and reads the appropriate JHAs. The second day the new employee does the job, while the buddy observes him/her. For the first six months on the job a new employee is considered a probationer and may not work beyond the line of vision of another employee. Supervisors are strictly charged to ensure that this training process is followed for all new employees and for any employee beginning a new job at the worksite.

All employees are encouraged to suggest qualified trainers, including themselves. Management is responsible for ensuring that all training offered at the site is conducted by qualified persons.