personnel who are directly responsible for the cleanup of an incident site after an accident.

Responsible Persons

There are three groups of responsible persons that are central to the effective implementation of our Blood borne Pathogen Program. These are:

The Safety Manager

Department Supervisors and Foreman

Our employees

Safety Manager

The Safety Manager will be responsible for the overall management and support of our facility's Blood borne Pathogens Program. Activities delegated to this position typically include, but are not limited to:

- Primary responsibility for implementing the Exposure Control Program for the entire facility.
- 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 this plan.
- Looking for ways to improve the Exposure Control Program, a well as to revise and update the plan when necessary.
- Collecting and maintaining suitable reference materials.
- Acting as facility liaison during OSHA inspections.
- Conducting periodic facility audit to maintain an up-to-date Exposure Control Program.
- Maintaining an up-to-date list of facility personnel requiring training, in conjunction with facility management.

- Developing suitable education and training.

Department Supervisors and Foreman

Department Supervisors and foreman are responsible for exposure control in their receptive areas. They work directly with the Safety Manager and our employee to ensure the proper exposure control measure are followed.

Employees

As with all of our facility's safety programs, our employees have the most important role in our Bloodborne Pathogens Compliance Program, for the ultimate execution of much of the program rest in their hands. In this role they may be required to know and perform the following:

- Know what tasks, if any, they perform having occupational exposure.
- Attend the Blood borne Pathogens Training Sessions.
- Plan and conduct all operations in accordance with our work practice controls.
- Develop good personal hygiene habits.

Availability of the Exposure Control Plan to Employees

To help employee with their efforts, our facility's Exposure Control Plan is available at any time for review. Employees are advised of this availability during their education and training sessions. Copies of the Exposure Control Plan are kept in the Safety Manager's office.

Plan Review and Update

To keep our Exposure Control up-to-date, the plan will be reviewed and updated under the following circumstances:

- Annually, on or before January 30th of each year.

- Implementing appropriate Housekeeping Procedures.

Universal Precautions

Universal precautions will be observed at our facility in order to prevent contact with blood or other potentially infectious materials. All blood or other potentially infectious material will be considered infectious regardless of the perceived status of the source individual.

- Gloves will be worn when touching blood or other body fluids, mucus membranes, non-intact skin, or handling items or surfaces soiled with blood or other body fluids.

- If it is anticipated droplets of blood or any body fluid may be come in contact with the mucus membranes of the employees eye, nose or mouth, he/she will wear protective equipment. {i.e. goggles or face shield}

- Hands or other skin surfaces will be washed immediately if contaminated with blood or other body fluids. Hands will also be washed immediately upon glove removal.

- Any items such as razors, knife blades, broken glass or equipment will be disposed of in a puncture and leak proof container, labeled for disposal of such items.

- To minimize exposure to body fluids during CPR, non-reflexive breathers or other disposable aids will be used.

- If clothing is contaminated it is to be removed as soon as possible.

- Eating, drinking, smoking, applying cosmetics or lip balm, and handling contact lens are prohibited in the first aid room.

Engineering Controls

Engineering controls help to eliminate or minimize employee exposure to bloodborne pathogens. At our facility, the following engineering controls will be utilized:

- Use of sharps container for disposable sharps.

- Use of containers and appropriate disposal bags for potentially infectious waste.

- Whenever new or modified tasks and procedures are implemented which could affect occupational exposure of our employees.

- Whenever our employees' jobs are revised such that new instances of occupational exposure may occur.

- Whenever we establish new functional positions within our facility that may involve exposure to blood borne pathogens.

Exposure Determination

OSHA requires employers to conduct an exposure determination concerning which employees may incur occupational exposure to potentially infectious materials. The exposure determination is made without regard to the use of personal protective devices. This is, the employee is considered exposed even of they wear personal protective equipment. At this facility, the following job classifications have been determined to have the possibility of an occupational exposure to bloodborne pathogens:

- Janitor - Tasks or procedures which may cause exposure are cleaning of restrooms and cleaning of a first aid station or accident site.

- Foreman - Task or procedures which may cause exposure is attending a work related injury. (only foreman which have received first aid training should be attending an injury.)

- First Aid Personnel - Task or procedures which may cause exposure is attending a work related injury.

The Safety Manager will work with department supervisors and foreman to review and update this list as our tasks, procedures, and classifications change.

Methods of Compliance

We understand that there are a number of areas that must be addressed in order to effectively eliminate or minimize exposure to bloodborne pathogens in our facility.

These area consists of:

- The use of Universal Precautions.
- Establishing appropriate Engineering Controls.
- Implementing appropriate Work Practice Controls.
- Using necessary Personal Protective Equipment.

- Hand-washing facilities which are readily accessible to the employees who incur exposure to blood and other potentially infectious materials. Hand-washing facilities are located in the first aid room and restrooms.

Personal Protective Equipment

Personal protective equipment is our employees' "last line of defenses" against bloodborne pathogens. Our facility provides, at no cost to employees, the personal protective equipment they need to protect themselves against exposure. This equipment includes, but not limited to those listed below:

- Gloves
- Safety
- Goggles
- Face shields
- Respirators

The Safety Manager, working with the department foreman, is responsible for ensuring that all department and work areas have appropriate personal protective equipment available to employees.

Employees' personal protective equipment is chosen based on the anticipated exposure to blood or other potentially infectious materials.

To ensure that personal protective equipment is not contaminated and is in the appropriate condition to protect employee from potential exposure, our facility adheres to the following practices:

- All personal protective equipment is inspected periodically and repaired or replaced as needed to maintain its effectiveness.

- Reusable personal protective equipment is cleaned, laundered, and decontaminated as needed, at no cost to employees.

To insure equipment is used as effectively as possible, our employees adhere to the following practices when using their personal protective equipment.

- All potentially contaminated personal protective equipment is removed prior to leaving a work area.

- Disposable gloves are replaced as soon as practical after contamination or if they are torn,

punctured, or otherwise lose their ability to function as a exposure barrier. Reusable utility gloves are not used at this facility.

- Protective clothing, such a coats, are worn whenever potential exposure to the body is anticipated.

Housekeeping

Maintaining our facility in a clean and sanitary condition is an important part of our Exposure Control Plan for Bloodborne Pathogens. Our janitorial and cleaning staff employs the following practices:

- Any surface or equipment contaminated with blood or other body fluids will be cleaned as soon as possible.
- Employees will use paper towels to remove the visible materials and then decontaminate using 10:1 water and bleach solution, that is one cup bleach to ten cups water.
- Cleaning products such as paper towels and gloves will be placed in plastic bags and burned or removed by a hazardous waste disposal company. The bags will be red in color and marked with biohazard label.
- Regulated wastes, including bandages, feminine hygiene products, etc. are also placed in biohazard bags for disposal consistent with the manner listed above.

The Safety Manager, working with the Plant Manager, is responsible for setting up our cleaning and decontamination schedule and insuring it effectiveness within our facility.

Hepatitis B Vaccination, Post-Exposure Evaluation and Follow-Up

Vaccination Program

To protect our employees as much as possible from the possibility of a Hepatitis B infection, our facility has implemented a vaccination program. This program is available, at no cost to the employees, to all individuals who have been identified as having the possibility of occupational exposure to blood or other body fluids. The vaccination will be made available within ten working days of the job assignment or ten days after an exposure. {See Appendix B}

Employees who decline the Hepatitis B vaccine will sign a waiver which uses the wording in Appendix A of the OSHA standard {See Appendix A at the end of this sample

program}. Employees who initially decline the vaccine but who later wish to have it may request and receive it within ten days at no cost to that employee.

The Safety Manager will announce the date for the vaccinations and be responsible for keeping the recorded employee consent or refusal forms. (See Appendix A and B)

Vaccinations are performed under the supervision of a licensed physician or other healthcare professional.

Post Exposure Evaluation and Follow-Up

If one of our employees is involved in an accident where exposure to bloodborne pathogens may have occurred, there are two things we immediately focus our efforts on:

1. Investigating the circumstances surrounding the exposure incident.
2. Insuring that our employees receive medical consultation and treatment (if necessary) as quickly as possible.

The Safety Manager will investigate every exposure incident that occurs in our facility. This investigation is initiated within 24 hours of the incident and involves gathering, but not limited to, the following information:

- Where, when, and how the incident occurred.
- What potentially infectious materials were involved.
- Source of the infectious materials.
- What circumstances surrounded the incident.
- Personal protective equipment being used at the time.
- Action taken as a result of the incident.

This information is evaluated and documented using the "Incident Investigation Form" (Appendix C) or a form requiring at least the same basic information.

Our follow-up process consists of several steps, as outlined below: (See Appendix D)

- First, an exposed employee is provided with (1) documentation regarding the routes of exposure and the circumstances under which the exposure incident occurred and (2) identification of the source individual (if possible).

- Next, (if possible) the source individual blood is tested to determine HBV and HIV infectivity. This information will also be made available to the exposed employee, if it is obtained. At that

time, the exposed employee will be made aware of any applicable laws and regulation concerning disclosure of the identity and infectious status of a source individual.

- Finally, the blood of the exposed employee is collected and tested for HBV and HIV status.

Once these procedures have been completed, an appointment is arranged with a qualified healthcare professional to discuss the medical status of the exposed employee. This includes an evaluation of any reported illnesses, as well as any recommended treatment.

We recognize that much of the information involved in this process must remain confidential, and will do everything possible to protect the privacy of the individuals involved.

Information Provided To the Healthcare Professional

To offer assistance, we forward a number of documents to the healthcare professional. These typically include the following:

- A copy of the Bloodborne Pathogen Standard.
- A copy of the "Incident Investigation Form" (Appendix C) and any accompanying information describing the exposure incident.
- The exposed employee's relevant medical records.
- Any other pertinent information.

Healthcare Professional's Written Opinion

After consultation, the healthcare professional will provide a written opinion to the employer (within 15 days) evaluating the exposed employee's situation. The employer will then notify the exposed employee of the results of that evaluation.

The healthcare professional shall be instructed to limit their opinions to the following:

- Whether the Hepatitis B vaccine is indicated and of the employee has received the vaccine.

- Following an exposure incident, that the exposed employee has beeninformed of the results of the evaluation.

- Following an exposure incident, that the employee has been told about any medical

conditions resulting from that exposure to blood or other potentially infectious materials.

- The written opinion to the employer will not reference any personal medical information.

Medical Records

To insure that we have as much medical information as possible available for the participating healthcare professional, our facility will maintain comprehensive medical records on our employees. The Administrative Manager is responsible for maintaining these records, which will include the following information:

- Name of the employee.
- Employee's social security number.
- A copy of the employee's Hepatitis B Vaccination status.
- Copies of the results of the examinations, medical testing, and follow-up procedures which took place as a result of an employee 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.

As with all information in these areas, we recognize it is important to keep information in these medical record confidential. We will not disclose or report this information to anyone without our employees written consent, except as required by law.

Training Topics

Training will be provided to all affected employees at the time of hire and at least annually there after. Training will include, but not limited to, the following:

- Employees will be provided access to a copy of the OSHA Bloodborne Pathogen Standard, 29 CFR 1910.1030, and a written copy of the company's exposure control plan.
- The employees will receive general information regarding bloodborne pathogen diseases with emphasis on epidemiology, symptomology, and modes of transmission of Hepatitis B and HIV.
- The employees will be shown how to identify tasks that may involve exposure to blood or other

infectious materials.

- The employees will review the use and limitations of methods that will reduce or prevent exposure. These methods are engineering controls, work practice control, and personal protective equipment.

- The employees will learn the types and proper use, location, removal, and handling of contaminated personal protective equipment. The information regarding the selection of PPE will also be included.

- The employees will be provided information on the Hepatitis B Vaccine, including its; efficiency, safety, mode of administration, benefits of vaccination, and our facility's free vaccination program.

- The employees will be instructed in actions to take in the event of an exposure, including reporting, medical follow-up, and counseling.

- The employees will be shown the visual warnings of biohazards in our facility, including labels, signs, and color coded containers.

- The employees will be provided with an opportunity to ask questions of the instructor in the training program.

Training Methods

Our facility's training presentation typically consists of a classroom type atmosphere with personal instruction and employee handouts. Time is allotted to provide the employees an opportunity to ask questions and interact with the instructor.

Recordkeeping

We maintain training records containing the following information:

- Dates of all training sessions.
- Contents/summary of the training sessions.
- Name and qualifications of the instructor(s).
- Names and job titles of employees attending the training sessions.

The training records are available for examination and photocopying by employees and their representatives, as well as OSHA and it representatives. These records are

maintained by the Safety Manager.

Labels and Signs

Biohazard labels are the most obvious warnings of possible exposure to bloodborne pathogens. Because of this, we have implemented a comprehensive biohazard warning labeling program in our facility using approved labels, or when appropriate, red "color coded" containers. The Safety Manager is responsible for setting up and maintaining this program in our facility.

The following items in our facility will be properly labeled: {Below are some examples of some items needing labeling. Please add or subtract items needed in your specific facility.}

- Containers of regulated waste.
- Sharps disposal containers.
- Other containers used to store, transport or ship blood and other I infectious materials.
- Laundry bags and containers, if containing or were in contact with infectious materials.
- Contaminated portions of equipment.

Information and Training

All employees who have the potential for exposure to bloodborne pathogens are put through a comprehensive training program providing them with as much information as possible on the issue.

New employees or employees changing jobs or job functions requiring training in blood borne pathogens will receive this training at the time of their new job assignment. After initial training, employees will be retrained at least annually to jeep their knowledge current.

The Safety Manager is responsible for seeing that all employees who have any potential for exposure to blood borne pathogens receive this training.

Appendix A

Vaccination Declination Form

Date _____

Employee Name: _____

Employee SSN: _____

I understand that due to my occupational exposure to blood or other potential infectious materials I may be at risk of contracting the Hepatitis B viral (HBV) infection. I have been given the opportunity to be vaccinated with Hepatitis B vaccine, at no charge to myself.

However, I decline the Hepatitis B vaccination at this time. I understand that by declining this vaccine, I continue to be at risk of contracting 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 the Hepatitis B vaccine, I can receive the vaccination series, at no charge to me, at that time.

_____ _____

Employee Signature **Date**

_____ _____

Safety Manager Signature **Date**

Appendix B

Employee Consent to Hepatitis B Vaccine

On {Date}, I {Name} received information concerning the risk of occupational exposure to blood or other potentially infectious material in the position of {Job Title}, which has been determined as job classification exposure Category {I or II}. I have received a copy of the Hepatitis B information packet which has been explained to me and I understand this information.

I have been informed and understand (1) that Hepatitis B vaccination may reduce the potential risk of occupationally contracted viral hepatitis infection, and (2) the risks of the Hepatitis B vaccination which may include pain, itching, bruising at the injection site, sweating, weakness, chills, flushing and tingling, and (3) to obtain adequate immunity to viral Hepatitis B, it will be necessary to receive all three vaccinations of the vaccine series which are administered one month and six months after the initial vaccination, and (4) that the vaccination will be provided to me free of charge by {Name of Facility}. If at such future time the U.S. Public Health Service recommends a booster dose(s) of Hepatitis B vaccine, such booster dose(s) shall also be provided to me at no cost if I am employed by the facility in a job classification that involves some risk of an occupational exposure to blood or other potentially infectious materials.

If I leave the employment of this facility before the series is completed, it is my responsibility to contact my own medical provider to complete the vaccine series.

I hereby consent to the administration of the Hepatitis B vaccination and voluntarily acknowledge that:

- I do not have an allergy to yeast.
- I am not pregnant or nursing.
- I am not planning to become pregnant within the next six months.
- I have not had a fever, gastric symptoms, respiratory symptoms, or other signs of illness in the last 48 hours.

I do have the following known allergies:

Food: _____

Drugs: _____

Other: _____

YOU MAY WISH TO CONSULT WITH YOUR PHYSICIAN BEFORE TAKING THE VACCINE.

_____ _____
(Employee Name) (Date)

_____
(Social Security Number)

_____ _____
(Witness Signature) (Date)

Appendix C

Exposure Incident Investigation Form

Date of Incident : _____ Time of Incident : _____

Location : _____

Potentially Infectious Materials Involved:

Type : _____ Source : _____

_____ _____

Circumstances : {Work being performed, etc.} _____

_____

_____

_____

How Incident Was Caused: {Accident, equipment malfunction, etc.}

_____

_____

_____

Personal Protective Equipment Used : _____

_____

Actions Taken : {Decontamination, clean-up, reporting, etc.}

_____

_____

_____

Recommendations For Avoiding Repetition: _____

_____

_____

_____

Appendix D
Post-Exposure Evaluation and Follow-up Checklist

The following steps must be taken, and information transmitted to healthcare professional, in the event of an employee's exposure to Bloodborne Pathogen.

Activity	Completion Date
1. Employee furnished with documentation regarding exposure incident:	_____
2. Source individual identified: _____ (Source individual)	_____
3. Source individual's blood collected and results given to exposed employee: _____ Consent from source has not been obtained.	_____
4. Exposed employee's blood collected and tested:	_____
5. Appointment arranged for employee with healthcare professional: _____ (Healthcare Professional Name)	_____

Documentation forwarded to healthcare professional:

_____ Bloodborne Pathogens Standard.
_____ Description of exposed employee's duties.
_____ Description of exposure incident, including exposure routes.
_____ Results of source individual's blood testing.
_____ Employee's medical records.

Substance Abuse Program

Purpose

Sierra Packaging and Converting, LLC is dedicated to the protection of its employees from situations arising from substance abuse. To ensure that its workforce is productive, its facility is safe, and the success of its business is not hindered by substance abuse, Sierra Packaging and Converting, LLC has established a Substance Abuse Program. At the same time, the program will promote morale and reduce absenteeism, accident potential, and health and workers' compensation insurance.

Administrative Duties

The Human Resource Director, our company's Substance Abuse Program Administrator, is responsible for developing and maintaining the written substance Abuse Program. This person is solely responsible for all facets of the program and has full authority to make necessary decisions to ensure the success of this program. The Human Resource Director is also qualified via appropriate training and experience that is commensurate with the complexity of the program to administer or oversee it and conduct the required evaluations of program effectiveness.

Company Policy

Because our company is concerned about

- Workplace safety,
- Worker health,
- Product quality,
- Productivity,
- Public liability, or
- Regulatory compliance.

it is committed to a drug- and alcohol-free workplace. Our company substance abuse policy statement is as follows:

> The possession, sale, or use of illegal drugs is inconsistent with the company's objective of operating in a safe and efficient manner. Accordingly, no officer,

employee, agent, contractor, or visitor shall use or have in his or her possession illegal drugs during working hours or on company property at any time. Additionally, no officer, employee, agent, or contractor shall report to work while under the influence of alcohol or illegal drugs.

Anyone violating this policy will be subject to the following:

> *The services of any employee who engages in such conduct will be subject to discipline up to and including discharge per vested authority. The only exception is the taking of prescribed drugs under the direction of a physician. The unlawful involvement with drugs or narcotics off company property will constitute grounds for severe disciplinary action, up to and including termination of employment.*

Sierra Packaging and Converting, LLC will give each employee a copy of our drug-free workplace policy statement.

If you have a substance abuse problem, it is your responsibility to seek and complete treatment. If you think someone you know (like a co-worker or a family member) has a drug problem, you could tell the person that, based on what you've seen, you believe something is happening and it concerns you. Urge that person to get help. If nothing is done, that person could adversely affect the well being of not only himself/herself, but you, your family, and the company.

Drug and Alcohol Testing

We retain the right to test our employees for alcohol and drugs according to the following guidelines:

- Pre-employment.
- Following any work-related injury that requires medical attention.
- Following any accident that results in property damager.
- Reasonable suspicion.

If a test reveals a positive result, then

the employee will be subject to disciplinary action of to and including and termination of employment.

See the Drug and Alcohol Testing section later in this written program for more details.

Company-Sponsored Activities

The Company prohibits the use of alcohol during company-sponsored activities.

Supervisor Training

Supervisors are the key to the success of our policy. As the people in direct contact with employees, supervisors can detect performance problems that may indicate substance abuse. Supervisors are responsible for:

1. Observing and documenting unsatisfactory work performance or behavior;

2. Talking to employees about work problems and what needs to be done about them (i.e., contacting the Employee Assistance Program or local resources); and

3. Other responsibilities.

In order to carry out their responsibilities properly, supervisors must understand the substance abuse policy, be able to explain the policy to employees, and know when to take action.

Our supervisors are *not* responsible for diagnosing substance abuse problems and treating substance abuse problems.

Our supervisors are trained to observe employees' job performance noting the following items:

1. Physical signs: Unusual clumsiness and frequent illness;
2. Mood: Unusually lighthearted one day and depressed the next;
3. Absenteeism: More than usual;
4. Actions: Violent reactions when things go wrong or when upset;
5. Accidents: Increased number of accidents; and
6. Relationships: Easily irritated by others; would prefer being left alone rather than interacting with other employees.

Other training topics we cover with our supervisors include the following:

- Information on specific drugs,
- Methods of detecting drug and alcohol use,
- Insurance coverage for substance abuse treatment,
- Prevention and education strategies, and
- Background on drug testing issues and how the drug testing program relates to the EAP.

The company training program uses classroom instruction that uses lectures, discussions, videotapes, and/or conference formats.

The Human Resources Department is responsible for providing supervisor training. The Human Resource Director and/or Safety Manager is responsible for conducting the training.

Employee Education and Awareness

Our employees must understand and remain aware of our ongoing commitment to a drug-free workplace. All new and current employees must successfully complete Sierra Packaging and Converting, LLC's Employee Education and Awareness Program.

The Human Resource Department will identify when each employee will receive retraining. The Human Resources Department and/or Safety Manager is responsible for conducting this training.

The company training program uses Classroom instruction including lecture, discussion, videotape, and/or conferences.

Through training, Sierra Packaging and Converting, LLC ensures that employees are knowledgeable in the following:

1. Dangers of drug abuse,
2. Our drug-free workplace policy,
3. The availability of any drug counseling programs,
4. The possible penalties for drug abuse violations occurring in the workplace,
5. Your company's EAP and its services,
6. How drugs and alcohol actually affect the company and the employee including productivity,
7. Product quality,
8. Absenteeism,
9. Health care costs and/or accident rates,

10. Testing procedures,
11. Health effects of alcohol and drugs,
12. How drugs affect the community,
13. Illegal drugs (what they look like, how they are used, their effects),
14. The symptoms of overdose and withdrawal),
15. How the use of alcohol and drugs can influence their children's behavior,
16. How to help others avoid involvement in substance abuse, and
17. How to recognize the signs of substance abuse.

Drug and Alcohol Testing

Our drug and alcohol testing program is also part of our Substance Abuse Program. We have set up a drug testing program for the following reasons:

1. It is the right business decision for your company; or
2. The work your employees do falls under rules that require drug testing.

Recordkeeping

Human Resource Department is responsible for maintaining all records and documentation related to employee training and testing.

Conviction Notification

Sierra Packaging and Converting, LLC will ensure that the contracting agency is notified within 10 days after receiving notice that an employee has been convicted of violating any criminal drug statute.

Employee Sanction

Sierra Packaging and Converting, LLC will ensure that any employee who is convicted of violating any criminal drug statute, will have sanctions imposed or will be required to satisfactorily participate in a drug abuse assistance or rehabilitation program.

OSHA Inspection Management

Opening Conference

1. Inspector should explain purpose & reason for visit.
   (E.g., triggered by complaint, a fatality, catastrophe)

   Company's rights when inspection is related to an employee complaint.
   a. copy of complaint
   b. knowledge of subject matter of complaint
   c. company has "no" right to employee's identity

2. Company representative should ascertain precisely the scope of the inspection & ask for a copy of the OSHA standards that will apply to the inspection.

3. Inspector should be made aware immediately if company is participating in an OSHA compliance program.

4. Inspector should explain reasons for scrutinizing specific areas because these elements define the focus of the inspection.

The Walkabout

1. Do not volunteer information that is not requested.

2. A company representative should remain with the inspector at all times.

3. Inspector may choose a non-management employee representative.

4. Inspector should limit the number of employee consultations to a reasonable number & should not unduly interfere with their work.

5. If inspection appears to be expanding in scope beyond what was discussed in conference, company representatives should not hesitate to point that out & question the change in plans.

6. If OSHA inspector takes any photos or samples the company representative should do the same for later comparison, if necessary.

7. If inspector points out a violation that can be corrected immediately, that correction should be made. A simple show of good faith.

8. If the inspector is unduly hostile, abusive or intrusive beyond the initial defined scope of the inspection---the employer should consult with legal counsel about requesting that the inspection be adjourned pending a meeting with the area director or for other possible legal action before the walkabout continues.

9. In any case, company representatives should not respond to an inspector in a hostile manner—they should maintain a professional, matter-of-fact demeanor.

Examination of Records

1. Records to be inspected include records of injuries, illnesses, fatalities, & exposures to any toxic or hazardous substances.

2. OSHA 200 and 300 logs & its required posting.

3. OSHA Health & Safety Poster.

4. Training records.

5. Hazardous communication (HAZCOM) program & material safety data sheets (MSDSs).

The Closing Conference

1. Company should ask the inspector to explain problems & needs that were identified. (This provides an opportunity to ask questions about corrective action (abatement) & anticipated citations & penalties.)

2. Inspector is highly unlikely to disclose specific penalties.

3. Inspector should explain deficiencies & company's right to appeal any adverse findings & penalties.

4. Inspector should provide company with a copy of OSHA publication 3000, which explains employer rights & responsibilities following an OSHA inspection.

What Happens After the Inspection

1. Inspector files a report with the area director, who determines whether to issue citations & assess penalties.

2. Company decides whether or not to exercise its right to appeal.

Company corrects all deficiencies to avoid further penalty(s).

BRIAN SANDOVAL
Governor

TERRY JOHNSON
Director

STATE OF NEVADA

DONALD E. JAYNE, CPCU
Administrator

JOSEPH H. NUGENT, CSP, ARM
Chief Administrative Officer

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DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INDUSTRIAL RELATIONS
SAFETY CONSULTATION AND TRAINING SECTION
4600 Kietzke Lane, E-144
Reno, Nevada 89502

May 11, 2011

Mr Otis Wilson
Plant Manager
Sierra Packaging & Converting LLC
1400 Kleppe Lane
Sparks, NV 89431

Dear Mr Wilson:

In response to your request, Safety Specialist Oscar Fuentes conducted a full service safety survey at your facility on March 15, 2011 and April 19, 2011.

The enclosed report includes a summary of the visit, identifies the hazards and non-compliances found during the visit, and presents recommendations for correcting the identified hazards and for preventing their recurrence. The report also includes a discussion concerning management practices that are considered to be an essential ingredient in the effective implementation of an ongoing, systematic hazard prevention program, as required pursuant to Nevada Revised Statute (NRS) 618.383.

Accompanying this report is a List of Hazards which itemizes all of the serious hazards found during this visit. Included on this list is a description of the hazard and the date by which we mutually determined that the hazard would be corrected. **This list must be posted, unedited, in a prominent location where it is readily observable by all employees for three working days, or until the hazard(s) are corrected, whichever is later.**

We encourage you to keep your employees informed of all hazards found during the survey and all of the corrective actions that you take. This knowledge will help them to do their part in maintaining a safe and healthful workplace, and it will let them know of your concern for their safety. Should you need, and we approve, an extension to the correction due date(s), a new List of Hazards will be sent to you showing the extended date(s)

C

During the time that you are working on correcting these hazards, Nevada OSHA may not conduct a scheduled inspection at your work site, providing that you are within the correction due dates, interim protection is in place, and the List of Hazards is posted. Should these conditions not be met, a compliance inspection may be conducted.

The hazards found during the survey of your workplace are identified in Attachment A - Report of Hazards Found. Each hazard is categorized and described and recommendations are given for its correction. Hazards are in order of item number, not necessarily in order of importance

Hazards could be in any of the following categories:

IMMINENT DANGERS are hazards that can reasonably be expected to cause death or serious physical harm immediately or before this written report is received. Any such hazards would have been corrected immediately.

SERIOUS HAZARDS can cause an accident or health hazard exposure resulting in death or serious physical harm. Each such hazard has been assigned a mutually agreed-upon date by which correction is to be completed.

OTHER-THAN-SERIOUS HAZARDS lack the potential for causing serious physical harm, but could have a direct impact on employee safety and health. No correction dates have been set, but we highly encourage you to correct these hazards and to notify us of the action taken

REGULATORY HAZARDS reflect violations of OSHA posting requirements, recordkeeping requirements, and reporting requirements as found in Nevada Revised Statutes 618 and Nevada Administrative Code 618. No correction dates have been set, but we highly encourage you to correct these hazards and to notify us of the action taken.

Those hazards that were identified and classified as serious show a projected schedule for correction. Also included with this visit report is Attachment B - Employer Report of Action Taken, a form to record the actions you are taking to correct the identified hazards. **You must notify us in writing when the serious hazards are corrected. Please complete Attachment B and return it to our office before the scheduled correction date of May 30, 2011.**

As you were informed during the visit, we are required to notify Nevada OSHA if serious hazards are not corrected by the agreed-upon corrective action date. Extensions to the corrective action dates may be granted if you encounter difficulties completing correction within the established time frames. However, we must receive your written request for an extension before the correction due date Extension requests must be accompanied by a copy of Appendix B of this report annotated to show the actions taken for each of the hazards identified during the visit **Incomplete extension requests will not be approved The extension request must include the following information:**

- **An explanation of why the request is necessary.**
- **A list of the hazards for which corrective actions are not complete and that will require an extension.**
- **An explanation of the interim actions that the employer has taken to minimize the hazard potential while awaiting final corrective action completion.**
- **The date when corrective actions are expected to be complete.**

Your Partner for a Safer Nevada

Although we are not required to notify Nevada OSHA if other-than-serious or regulatory hazards are not corrected, these hazards could result in injury to your employees. Moreover, your company could be subject to a citation for these hazards if they were found during a Nevada OSHA enforcement inspection.

In the event of an Nevada OSHA inspection, it is important to remember that the compliance officer is not legally bound by the consultant's advice or by the consultant's failure to point out a specific hazard. You may, but are not required to, furnish a copy of this report to the compliance officer, who may use it to determine your good faith efforts toward safety and health and reduce any proposed penalties. You are, however, required by 29 CFR 1910.1020 to furnish any data from this report pertaining to employee exposure to a toxic substance or harmful physical agent.

We encourage you to keep your employees informed of all hazards found during your own self-inspections and all of the corrective actions that you take. This knowledge will help them to do their part in maintaining a safe and healthful workplace, and it will let them know of your concern for their safety.

Thank you for accepting our assistance. Contact Safety Specialist Oscar Fuentes for any additional information concerning closure of the report or for any further assistance with your programs.

Sincerely,

Joseph A. Giddings

Joseph A. Giddings
Consultation Supervisor

Enclosures
1. Consultation visit report #504841503
2. List of Hazards
3. Safety & Health Program Assessment Worksheet

CONSULTATION REPORT

for

Sierra Packaging & Converting LLC
1400 Kleppe Lane
Sparks, NV 89431

Submitted By:

STATE OF NEVADA

DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF INDUSTRIAL RELATIONS
SAFETY CONSULTATION AND TRAINING SECTION
4600 Kietzke Lane, Suite E-144
Reno, Nevada 89502
(775) 824-4630
Fax: (775) 688-1478

Your Partner for a Safer Nevada

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Executive Summary

A full safety and health survey of Sierra Packaging & Converting LLC revealed 21 non-compliances Mr. Otis Wilson, Plant Manager for the company agreed to correct the identified hazards Mr. Wilson requested the survey to ensure compliance with applicable State Statutes and Federal Regulations During the hazard survey hazard communication, electrical, exit signs, portable fire extinguishers, machine guarding, and step platform deficiencies were noted. The employer corrected most of the identified hazards prior to the closing conference. The facility was orderly and well maintained.

Summary of the Visit

Introduction:

This report provides the results of a full safety and health survey. When referring to this report, please reference the safety visit report number **504841503** and health visit report number **504841545**. The survey of the company was requested by Mr. Wilson.

Sierra Packaging & Converting LLC is a commercial flexographic printing company. The company is located at 1400 Kleppe Lane, in Sparks, Nevada. The company employs 90 full-time employees, who work an eight hour shift, five days a week.

Opening Conference:

On March 15, 2011, Safety Specialist Oscar Fuentes and Industrial Hygienist Randy Westmoreland held an opening conference with Mr. Wilson At this time, safety consultation procedures and the employer's rights and responsibilities as prescribed by 29 CFR Part 1908 were explained in detail. Mr Wilson was cooperative and courteous throughout the survey. He made a commitment to correct any occupational hazards discovered during the survey and also agreed that the scope of the survey would encompass the entire facility and all safety and health program documents and records were subject to review

Facility Survey:

A facility survey began on March 15, 2011 and concluded on April 19, 2011 Mr. Wilson accompanied and assisted Safety Specialist Oscar Fuentes and Industrial Hygienist Randy Westmoreland during the survey

The company had the required posters posted. First aid kits and fire extinguishers were located in various locations. Welding equipment, electrical extension cords, power tools, ink press machines, and personal protective equipment were inspected. Two forklifts were inspected with minor deficiencies.

The walkaround portion of the survey covered the production department, ink press department, laminator department, slitter department, and pouch machine department, plate making department, shipping/receiving departments and the maintenance department.

During the course of the survey 21 non-compliances were discovered. 18 items were categorized as serious and the remaining items were other-than-serious.

The following deficiencies included:

- Ladders/Stairs – Two identified hazards.
- Electrical – Six identified hazards.
- Fire Protection – Two identified hazards.
- Machine Guarding – Two identified hazards
- Exits & Routes – One identified hazard
- Power Industrial Truck – One identified hazard

- Nevada Written Safety Program – Two identified hazards
- Hazard Communication – Five identified hazards

Eight employees were interviewed as a sample to ascertain the safety and health awareness of the employees collectively. Based on these interviews, it was determined that the employees felt that it was a safe place to work.

Safety and Health Program Management:

The employer's written safety program did not include the following Elements:

Element 2: An explanation of the methods used to identify, analyze and control new and existing hazardous conditions.

Element 4: The procedures that must be followed to investigate and accident which has occurred and the corrective actions that are to be initiated

In addition, the employer's hazard communication program, lockout, tagout program and forklift program were reviewed. Of these programs reviewed, the hazard communication program is in need of being updated. Also, the written hazard communication program must be fully implemented for the overall program to be compliant. The implementation aspect of this survey includes maintaining current material safety data sheets (MSDSs) as well as properly labeling containers of hazardous substances

Other Services:

The employer was informed during the opening conference and survey, that the Safety Consultation and Training Section provides a variety of services such as regularly scheduled formal safety and health regulatory awareness training classes for employers and employees; a lending library of video tapes covering a variety of safety and health topics; copies of safety and health regulatory documents; written information, fact sheets, booklets, and other information on a variety of safety and health topics; and telephone assistance on an as needed basis.

Sierra Packaging & Converting LLC would benefit from having selected employees attend the Safety Consultation and Training Section formal training sessions These training classes are held at the Safety Consultation and Training Section offices. Please call our office to make a reservation and to obtain specific time and location information.

Closing Conference:

The closing conference was conducted on April 19, 2011, with Mr. Otis Wilson and Mr. Greg Guevarra, Maintenance Manager for the company All of the identified hazards were discussed in detail along with abatement dates

We informed Mr. Wilson and Mr. Guevarra that we would be available for any needed assistance in the event that the company would seek safety consultation services in the future.

Oscar Fuentes
Safety Specialist

Randy Westmoreland
Industrial Hygienist

Attachments:
A - Report of Hazards Found (safety and health)
B - Employer Report of Action Taken (safety and health)
C - List of Hazards (safety and health)

Attachments

A - Report of Hazards Found

Item Number	0001	Instance	A	Correction Due Date	03/15/11
Hazards Type	Serious				

Condition: A flight of stairs with four or more risers, less than 44 inches wide and having both sides open, was not equipped with one standard stair railing on each side.

INSTANCE A: A set of steps with four or more risers was not equipped with a standard stair railing on each side. Located at ink press #1. See Item (1) on the identified hazards form.

Potential Effects: Sprains, strains, contusions and fractures, from falls

Standard: 29 CFR 1910.23(d)(1)(iii)

Recommended Action: Install standard stair railings on each side.

A standard stair railing consists of top and intermediate rails and posts, and is 30-34 inches high when measured from the top of the top rail to the top of the stair tread next to a riser. The top rail must be smooth-surfaced; the ends must not present projection hazards, and the entire structure must withstand a force of at least 200 pounds in any direction at any point on the top rail.

Item Number	0002	Instance	A	Correction Due Date	03/15/11
Hazards Type	Serious				

Condition: Clear working space about electrical equipment was used for storage

INSTANCE A: An electrical panel was impeded by a metal file cabinet. Located at the east corner of the facility, near ink press #1. See Item (2a) on the identified hazards form

INSTANCE B: The electrical shut off switch that controls the lathe machine was impeded by another lathe machine. Located at the south wall of the maintenance department. The item was corrected prior to the closing conference. See Item (2b) on the identified hazards form.

Potential Effects: Burns and smoke-related injuries, from fire; electric shock, burns, and electrocution, from contact with live parts.

Standard: 29 CFR 1910.303(g)(1)(ii)

Recommended Action: Provide a minimum safe working clearance of at least three feet for equipment with voltages from 0-150 volts Equipment operating from 151-600 volts requires between three and four feet clearance depending on conditions as specified in Table S-1 of this standard. This clearance depth is measured from the front of the equipment and must be at least 30 inches wide

Item Number	0003	Instance	A	Correction Due Date	04/04/11
Hazards Type	Serious				

Condition: Unless specifically permitted otherwise in paragraph (g)(1)(ii) of this section, flexible cords and cables must not be used:

- As a substitute for the fixed wiring of a structure;
- Where run through holes in walls, ceilings, or floors;
- Where run through doorways, windows, or similar openings;
- Where attached to building surfaces;
- Where concealed behind building walls, ceilings, or floors; or
- Where installed in raceways, except as otherwise permitted in this subpart.

INSTANCE A: An orange electrical extension cord was used to power a refrigerator. Located at the east corner of the facility, near ink press #1. The item was corrected prior to the closing conference. See Item (3a) on the identified hazards form.

INSTANCE B: An orange electrical extension cord was used to power an industrial fan. Located upstairs platform of ink press #1. The item was corrected prior to the closing conference. See Item (3b) on the identified hazards form.

Potential Effects: Electrical burns, fires smoke inhalation, or death from electrocution.

Standard: 29 CFR 1910.305 (g) (1) (iv)

Recommended Action: Don't use flexible cords or cables for any of the purposes listed above. They are subject to damage, which could cause the electrical continuity to be compromised and create fire hazards as well.

Item Number	0004	Instance	A	Correction Due Date	03/21/11
Hazards Type	Other				

Condition: A portable fire extinguisher was not subjected to an annual maintenance check.

INSTANCE A: A portable fire extinguisher was not subjected to an annual inspection since February 11, 2010. Located outside of the production office. The item was corrected prior to the closing conference. See Item (4) on the identified hazards form.

Potential Effects: Burns and smoke-related injuries, from reliance on a defective extinguisher.

Standard: 29 CFR 1910.157(e)(3)

Recommended Action: Have all fire extinguishers on the site inspected by a qualified supplier at least annually. This inspection does not preclude the need for a monthly visual inspection.

Alternatively, eliminate the requirement for extinguishers by developing a written fire safety policy which requires the immediate evacuation of all employees from the workplace in the event of a fire and which includes a fire prevention plan.

Item Number	0005	Instance	A	Correction Due Date	03/21/11
Hazards Type	Serious				

Condition: Flexible cords and cables must be connected to devices and fittings so that strain relief is provided that will prevent pull from being directly transmitted to joints or terminal screws.

INSTANCE A: An orange electrical extension cord has a pulled strain relief at the male plug end. Located upstairs, ink press #1. The item was corrected prior to the closing conference. See Item (5a) on the identified hazards form.

INSTANCE B: A GEAR PUMP had a pulled strain relief at the housing of the motor. Located at the ink press #1. The item was corrected prior to the closing conference. See Item (5b) on the identified hazards form.

INSTANCE C: A GEAR PUMP had a pulled strain relief at the housing of the motor. Located at the back side of press station #1. The item was corrected prior to the closing conference. See Item (5c) on the identified hazards form.

INSTANCE D: A shop light had the male plug end with a pulled strain relief. Located inside the storage trailer, next to the maintenance department. The item was corrected prior to the closing conference. See Item (5d) on the identified hazards form.

INSTANCE E: An overhead hoist had the male plug end with a pulled strain relief. Located at the south wall of the facility. The item was corrected prior to the closing conference. See Item (5e) on the identified hazards form.

Potential Effects: Electrical burns, fires, smoke inhalation, or death from electrocution

Standard: 29 CFR 1910.305(g)(2)(iii)

Recommended Action: Use strain relief devices, and watch for wiring pulling loose from fittings where workers could contact live conductors

Item Number	0006	Instance	A	Correction Due Date	03/17/11
Hazards Type	Serious				

Condition: Snap switches mounted in boxes must have faceplates installed that:

- Completely cover the opening, and
- Seat against the finished surface.

INSTANCE A: A receptacle face plate did not completely cover the opening. Located at the dry rack area. The item was corrected prior to the closing conference. See Item (6a) on the identified hazards form.

INSTANCE B: A metal solid junction box was not equipped with a cover plate. Located near the north "EXIT" door. The item was corrected prior to the closing conference. See Item (6b) on the identified hazards form.

Potential Effects: Electrical burns, fires, smoke inhalation, or death from electrocution.

Standard: 29 CFR 1910.305(c)(4)

Recommended Action: Make sure snap switches mounted in boxes:

- Completely cover the opening, and
- Seat against the finished surface

Use a qualified electrician to do electrical work

Item Number	0007	Instance	A	Correction Due Date	03/21/11
Hazards Type	Serious				

Condition: Type of guarding: One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks

INSTANCE A: A GEAR PUMP station was not adequately guarded around the pulley, thus exposing employees to rotating parts. Located at ink press #2. The item was corrected prior to the closing conference. See Item (7a) on the identified hazards form

INSTANCE B: A GEAR PUMP station was not adequately guarded around the pulley, thus exposing employees to rotating parts. Located at the back end of ink press #2. The item was corrected prior to the closing conference. See Item (7b) on the identified hazards form.

INSTANCE C: The center section of LAMINATOR #2 was not equipped with a guard to protect employees from rotating parts. Located at the ECO CONVERT JUNIOR LAMINATOR #2 machine. See Item (7c) on the identified hazards form.

Potential Effects: Cuts, abrasions, and amputation, from contact with exposed nip point or rotating part; cuts, puncture wounds, and blindness, from flying chips; burns, from flying sparks.

Standard: 29 CFR 1910.212(a)(1)

Recommended Action: Securely attach guards in place to prevent dangerous machine components from being exposed, or to keep the guard from falling.

Item Number	0008	Instance	A	Correction Due Date	03/24/11
Hazards Type	Serious				

Condition: Listed or labeled equipment must be installed and used in accordance with any instructions included in the listing or labeling

INSTANCE A: A duplex receptacle attached to the bottom of an electrical panel designed for the interior lighting was broken. Located at the north wall of the facility. The item was corrected prior to the closing conference. See Item (8a) on the identified hazards form.

INSTANCE B: A fan was in operation that was designed for "Household Use" only. Located at the east corner of the maintenance shop, next to the storage trailers. The item was corrected prior to the closing conference. See Item (8b) on the identified hazards form.

Potential Effects: Electrical burns, fires, smoke inhalation, or death from electrocution.

Standard: 1910.303(b)(2)

Recommended Action: Install and use listed or labeled equipment in accordance with any instructions included in the listing or labeling. Only use electrical equipment within that listing or labeling, to do otherwise can lead to fires or electrical shock.

Item Number	0009	Instance	A	Correction Due Date	03/15/11
Hazards Type	Serious				

Condition: A portable fire extinguisher was not located and identified so that it was readily available to employees without subjecting the employees to possible injury.

INSTANCE A: A portable fire extinguisher was impeded by several paper rolls. Located next to ink press #3. The item was corrected prior to the closing conference. See Item (9) on the identified hazards form.

Potential Effects: Burns and smoke-related injuries, from uncontrolled fire.

Standard: 29 CFR 1910.157(c)(1)

Recommended Action: Provide appropriate fire extinguishers for the work environment; and provide them in sufficient number and in appropriate locations. The local fire department should be able to assist in determining the type and number of extinguishers that are required.

Do not allow materials or equipment to be stored around or in front of extinguishers in any way that would prevent immediate use in an emergency. Marking the floor area around each extinguisher with a notation such as "Keep This Area Clear" may help in this effort

Extinguishers are effective only when fires are in early stages.

Item Number	0010	Instance	A	Correction Due Date	03/15/11
Hazards Type	Serious				

Condition: An exit, way of approach thereto, or way of travel from the exit into the street or open space was not continuously maintained free of all obstructions or impediments to full instant use in the case of fire or other emergency.

INSTANCE A: The approach to the east "EXIT" door was impeded by buckets, spindles and wood lumber Located in the maintenance department The item was corrected prior to the closing conference. See Item (10) on the identified hazards form.

Potential Effects: Burns, smoke-related injuries, and other injuries, from delayed egress during fire or other emergency.

Standard: 29 CFR 1910.37(a)(3)

Recommended Action: Remove materials from exit ways and continuously maintain exit ways free from all obstructions and impediments.

The exit access must not go through a room that can be locked, such as a bathroom, to reach an exit or exit discharge, nor may it lead into a dead-end corridor.

Perform routine inspections to ensure exits, ways of approach thereto, and ways of travel from exits into the street or open space are available for instant use in case of fire or other emergency

Item Number	0011	Instance	A	Correction Due Date	03/25/11
Hazards Type	Serious				

Condition: Powered industrial trucks were not examined before being placed in service.

INSTANCE A: The right side signal of a KOMATSU forklift (#7), serial #3001b3A was inoperable. Located in warehouse #1. The item was corrected prior to the closing conference. See Item (11a) on the identified hazards form.

INSTANCE B: A TOYOTA forklift, serial #5FGEU25-74262 had the front mast damaged. Located inside warehouse #4. The item was corrected prior to the closing conference. See Item (11b) on the identified hazards form.

Potential Effects: Contusions, abrasions, fractures and crushing injuries, from mechanical handling equipment striking employees in the event of a malfunction.

Standard: 29 CFR 1910.178(q)(7)

Recommended Action: Establish and implement an inspection program. At the start of each shift, the operator should check the truck assigned to assure that it is in safe working order. If for any reason the operator believes that the truck is unsafe to drive or operate, it should be immediately reported to the supervisor.

Among the items to check are: operator controls, brakes, fluid lines and levels, lights, filters, safety devices (horn, fire extinguisher, etc.), and movement of the fork.

Unless qualified, the operator should not attempt to make any repairs. Only qualified and authorized personnel should be permitted to maintain, repair and adjust industrial trucks.

Item Number	0012	Instance	A	Correction Due Date	03/27/11
Hazards Type	Serious				

Condition: Electrical disconnecting means were not adequately marked to indicate their purpose.

INSTANCE A: Electrical panel (E-2) was not properly labeled. Located at the south wall, next to the shaft storage. The item was corrected prior to the closing conference. See Item (12a) on the identified hazards form.

INSTANCE B: An electrical panel was not properly labeled with a durable identification tag. Located at the northwest corner of the shipping office, warehouse #4. The item was corrected prior to the closing conference. See Item (12b) on the identified hazards form.

Potential Effects: Burns and smoke-related injuries, from fire; electric shock, burns, and electrocution, from contact with live parts.

Standard: 29 CFR 1910.303(f)(1)

Recommended Action: Markings which are legible, easily understood, and capable of withstanding the environment should be placed on each electrical disconnecting means.

Item Number	0013	Instance	A	Correction Due Date	03/27/11
Hazards Type	Serious				

Condition: A portable metal ladder was not maintained in good condition.

INSTANCE A: A portable metal step ladder was missing the right front wheel. Located inside warehouse #4. The item was corrected prior to the closing conference. See Item (13) on the identified hazards form.

Potential Effects: Sprains, strains, contusions and fractures, from falls.

Standard: 29 CFR 1910.26(c)(2)(iv)

Recommended Action: Remove the ladder from service and tag it for repair or replacement. Ladders must be inspected frequently and maintained in good condition at all times

"Frequent" inspection is generally interpreted as "before each use" for infrequently used ladders and "at the beginning or end of each day" for frequently used ladders. If a portable metal ladder tips over, it must be checked for side rail dents or bends, excessively dented rungs, loose rung-to-side rail or hardware connections, and sheared rivets. Oil or grease should be removed using steam cleaning or a solvent.

Item Number	0014	Instance	A	Correction Due Date	05/30/11
Hazards Type	Other				

Condition: A written safety program must include the following:

a. A statement explaining that the managers, supervisors and employees are responsible for carrying out the program;
b An explanation of the methods used to identify, analyze and control new and existing hazardous conditions;
c. An explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties;
d The procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated; and
e. A method for ensuring that employees comply with the safety rules and work practices.

INSTANCE A: The employer's written safety program did not include a procedure to identify, analyze and control hazards in the workplace. See Item (14) on the identified hazards form.

Potential Effects: Employee injury/illness from a lack of hazard identification and control, safety training and workplace hazard awareness.

Standard: NAC 618.540.1

Recommended Action: Develop a program specific to your worksite that includes the following:

1 A procedure that assigns responsibilities for managers, supervisors and employees.
2 Ensure that employees sign the "Rights and Responsibilities" document.
3. A procedure to identify high hazard areas at a work site.
4 A procedure for correcting hazards and a method for following up to ensure hazards do not reoccur.
5. Ensure an appropriate list of training topics specific to each job is identified in the written workplace safety program.
6. A procedure that ensures inspection records are maintained for purposes of trend analysis.
7. A procedure that allows employees to provide input without fear of reprisal.
8. Ensure the responsibility for the development and implementation of a safety and health training program is assigned to a trained individual.
9 Ensure training is provided to new employees, leased employees and outside contractors before they begin work
10 A procedure for follow up training needs to be implemented.
11 A policy that addresses rendering first aid and who can render first aid.
12. A procedure for investigating accidents and incidents that addressed corrective action

13 A method for maintaining accident investigation records.
14 A procedure that addresses the required forms that must be filled out for worker's compensation.
15. A procedure that ensures all employees are held equally accountable for compliance with safety policies
16. A procedure that provides positive reinforcement to individuals who comply with safe work practices.

The written program, and any training programs, shall be presented in a language and format that is understandable to each employee.

The written program shall be created and implemented within 90 days of the time that an employer starts business in Nevada Develop and provide compliant training programs for the new or revised subjects, and ensure that proper records are maintained. Where employees have not been trained to the existing program, provide training to all of the elements in the program that pertain to their duties, tasks, and to the possible emergency conditions that they might be exposed to in the interim.

Item Number	0015	Instance	A	Correction Due Date	05/30/11
Hazards Type	Other				

Condition: A written safety program must include the following:

a. A statement explaining that the managers, supervisors and employees are responsible for carrying out the program;
b An explanation of the methods used to identify, analyze and control new and existing hazardous conditions;
c. An explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties;
d The procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated; and
e. A method for ensuring that employees comply with the safety rules and work practices

INSTANCE A: The employer's written safety program did not include a procedure to investigate accidents and how to correct the identified hazards. See Item (15) on the identified hazards form.

Potential Effects: Employee injury/illness from a lack of hazard identification and control, safety training and workplace hazard awareness.

Standard: NAC 618.540.1

Recommended Action: Develop a program specific to your worksite that includes the following:

1. A procedure that assigns responsibilities for managers, supervisors and employees
2. Ensure that employees sign the "Rights and Responsibilities" document.
3. A procedure to identify high hazard areas at a work site.
4. A procedure for correcting hazards and a method for following up to ensure hazards do not reoccur
5 Ensure an appropriate list of training topics specific to each job is identified in the written workplace safety program
6. A procedure that ensures inspection records are maintained for purposes of trend analysis.
7. A procedure that allows employees to provide input without fear of reprisal.
8 Ensure the responsibility for the development and implementation of a safety and health training program is assigned to a trained individual.
9 Ensure training is provided to new employees, leased employees and outside contractors before they begin work

10. A procedure for follow up training needs to be implemented.
11. A policy that addresses rendering first aid and who can render first aid
12 A procedure for investigating accidents and incidents that addressed corrective action
13. A method for maintaining accident investigation records
14. A procedure that addresses the required forms that must be filled out for worker's compensation.
15. A procedure that ensures all employees are held equally accountable for compliance with safety policies.
16. A procedure that provides positive reinforcement to individuals who comply with safe work practices.

The written program, and any training programs, shall be presented in a language and format that is understandable to each employee.

The written program shall be created and implemented within 90 days of the time that an employer starts business in Nevada. Develop and provide compliant training programs for the new or revised subjects, and ensure that proper records are maintained. Where employees have not been trained to the existing program, provide training to all of the elements in the program that pertain to their duties, tasks, and to the possible emergency conditions that they might be exposed to in the interim.

Item Number	0016	Instance	A	Correction Due Date	05/30/11
Hazards Type	Serious				

Condition: Exposed parts of rotating horizontal shafting were not protected by stationary casings enclosing the shafting completely or troughs enclosing the sides and top or sides and bottom of the shafting.

INSTANCE A: Throughout warehouse #1, SLITTER and LAMINATOR machines were not equipped with guards over the shafts, thus exposing employees to rotating parts. See Item (16) on the identified hazards form

Potential Effects: Lacerations, abrasions, fractures, crushing injuries and amputation, from contact with or getting wound around in rotating parts.

Standard: 29 CFR 1910.219(c)(2)(i)

Recommended Action: Enclose the shafting either with a non-rotating or with a guard enclosing the sides, top and bottom.

You may construct and install a shop-made guard that conforms to OSHA's description of a standard guard. A standard guard is made of expanded metal, perforated or solid sheet metal, wire mesh on a frame of angle iron, or iron pipe. It is free of burrs and sharp edges. It is fastened securely either to the floor or to the machine it guards.

operation a piece of equipment requires specialized train and/or has specific training requirements under other OSHA standards. Training will be conducted for each specific piece of machinery and equipment to be utilized by the employee in the assigned work area.

[Safety Manager Name] will identify all new employees in the employee Orientation Program and make arrangements with Supervisor to schedule training.

Operational training consists of:

- Pre-operational procedures.
- Basic maintenance for machinery and equipment.
- Operational review of each piece of machinery, tool, or equipment the employee is expected to operate.
- How to safely operate each machine they will be required to use
- How to recognize potential accident producing situations, and
- How to know what to do when hazards are discovered.

Machine Guards

Purpose

The Machine Guard Program is designed to protect Employees from hazards of moving machinery. All hazardous areas of a machine shall be guarded to prevent accidental "caught in" situations. References: General Requirements for all Machines (29 CFR 1910.212), Woodworking Machinery (29 CFR 1910.213), Abrasive Wheels (29 CFR 1910.215), Power Presses (29 CFR 1910.217), Power Transmission (29 CFR 1910.219), and Subpart I of 29 CFR 1926.

Many accidents are caused by machinery that is improperly guarded or not guarded at all. Important factor that must be kept in mind relative to machinery guarding is that no mechanical motion that threatens a worker's safety should be left without a safeguard.

The following areas of machinery will be provided with barriers and/or enclosures that will effectively prevent employees from coming in contact with moving components:

1. Point of operation exposures such as blades, knives and cutting heads.

2. Power transmission exposures such as belts, pulleys, shaft, gears, etc.

3. Top, bottom and backside exposures, such as the underside of table saws and the wheels on band saws.

4. When a point-of-operation guard cannot be used because of unusual shapes or cuts, jigs or fixtures which will provide equal safety for the operator will be used.

5. Upon completion of an unusual operation, the guard will be immediately replaced.

Whenever a guard is removed for other than an operational requirement, the machine will be shut down and the control switch(es) locked and tagged in the "OFF" position.

Guards will be affixed to the machine. Where possible, the guards will be of the hinged type to enhance maintenance or adjustments.

Responsibilities

Management will ensure all machinery is properly guarded and that employees are provided adequate training on machine guard rules.

Supervisors will train assigned employees on the specific machine guard rules in their work areas. In addition, they will monitor and inspect to ensure machine guards remain in place and functional, and immediately correct machine guard problems.

Employees will not remove machine guards unless equipment if locked and tagged. They will replace machine guards properly and report machine guard problems to their supervisor immediately. Employees will not operate equipment unless guards are in place and functional. Only trained and authorized employees may remove machine guards

Machine Guarding Requirements

1. Guards shall be affixed to the machine where possible and secured.

2. A guard shall not offer an accident hazard in itself.

3. The point-of-operation of machines whose operation exposes an Employee to injury shall be guarded.

4. Revolving drums, barrels and containers shall be guarded by an enclosure which is

interlocked with the drive mechanism.

5. When periphery of fan blades are less than 7 feet above the floor or working level the blades shall be guarded with a guard having openings no larger than 1/2 inch.

6. Machines designed for a fixed location shall be securely anchored to prevent walking or moving. For example; Drill Presses, Bench Grinders, etc.

General Requirements for Machine Guards

1. Guards must prevent hands, arms or any part of an Employees body from making contact with hazardous moving parts. A good safeguarding system eliminates the possibility of the operator or other Employees from placing parts of their bodies near hazardous moving parts.

2. Employees should not be able to easily remove or tamper with guards. Guards and safety devices should be made of durable material that will withstand the conditions of normal use and must be firmly secured to the machine.

3. Guard should ensure that no objects can fall into moving parts. An example would be a small tool which is dropped into a cycling machine could easily become a projectile that could and injure others.

4. Guard edges should be rolled or bolted in such a way to eliminate sharp or jagged edges.

5. Guard should not create interference which would hamper Employees from performing their assigned tasks quickly and comfortably.

6. Lubrication points and feeds should be placed outside the guarded area to eliminate the need for guard removal.

Training

All Employees shall be provided training in the hazards of machines and the importance of proper machine guards. Machine safety and Machine guarding rules will be thoroughly explained as part of the new hire orientation program and annually as refresher safety training.

New Equipment Start-up Inspection Procedures

The procedures in this section are required at the following times:

- during and after the installation of new equipment,
- during and after the rearrangement of existing equipment into a new layout, and
- during the relocation of existing equipment.

While work is in progress on installation of new equipment, the following departments, in charge of specific expertise, must be involved from the beginning to the end of the installation process:

- Engineering
- Maintenance

Corrections that need implementation during the installation should be done as needed.

Before operation of the equipment in the workplace, all specialty departments must signify that the equipment meets all expectations in their area of concern.

The Supervisor is accountable for all phases of installation and for making sure equipment is safe and efficient to run before letting employees operate it.
Once the Supervisor has verified completion, the equipment can be put into service.

Inspections

Machinery, tools, and equipment will be inspected regularly to insure safety and serviceability. Supervisor inspects all machinery, equipment, cords and accessories on a monthly basis.

Recordkeeping

Each Supervisor is responsible for maintaining records of inspections of machinery, tools, and equipment. These records are kept worksite trailer and/or Safety Manager's office.

The Safety Manager maintains records in employee safety files of individuals trained and certified for machinery and equipment.

Disciplinary Procedures

Constant awareness of and respect for machine, tool, and equipment safety procedures and compliance with all safety rules are considered conditions of employment. Supervisors and individuals in the Safety and Employees Department reserve the right to issue disciplinary warnings to employees, up to and including termination, for failure to follow the guidelines of this machine, tool, and equipment safety program.

Program Evaluation

Although we may not be able to eliminate all problems, we try to eliminate as many as possible to improve employee protection and encourage employee safe practices. Therefore, [Safety Manager Name], Safety Manager is responsible for evaluating and updating this written plan. The evaluation will include a review of reported accidents, as well as near misses, to identify areas where additional safety measures need to be taken.

[Safety Manager Name], Safety Manager will also conduct a periodic review to determine the effectiveness of the program. This review may include:
a walk-through of the facility, and interviews with employees to determine whether they are familiar with the requirements of this program and if safety measures are being practiced.

Appendices

Machine Guarding Inspection List

Machine & Operation Safety Inspection List

Machine Guarding

Company Name: _____ Facility Address: _____

Manager/Supervisor: _____ Date/Time: _____ _____

Inspector(s): _____

Yes	No	NA	Corr Date	Area Inspected

Machine & Operation Safety Inspection

Company Name : _____ **Facility Address:** _____

Manager/Supervisor: _____ **Date:** _____

Inspector(s): _____

Machinery Inspected: _____

Yes	No	NA	Correction Date	Area Inspected
				Safeguard Requirements 1. Do the safeguards prevent workers' hands, arms, and other body parts for making contact with dangerous moving parts? 2. Are the safeguards firmly secured and not easily removable? 3. Do the safeguards ensure that no object will fall into the moving parts? 4. Do the safeguards permit safe, comfortable, and relatively easy operation of the machine? 5. Can the machine be oiled without removing the safeguard? 6. Is there a system for shutting down the machinery before safeguards are removed? 7. Can the existing safeguards be improved?
				Point of Operation Hazards 1. Is there a point-of-operation safeguard provided for the machine? 2. Does it keep the operator's hands, fingers, body out of the danger area? 3. Is there evidence that the safeguards have been tampered with or removed? 4. Could you suggest a more practical, effective safeguard? 5. Could changes be made on the machine to eliminate the point-of-operation hazard entirely?

				Power Transmission Hazards 1. Are there any unguarded gears, sprockets, pulleys, or flywheels on the apparatus? 2. Are there any exposed belts or chain drives? 3. Are there any exposed set screws, key ways, collars, etc.? 4. Are starting and stopping controls within easy reach of the operator? 5. If there is more than one operator, are separate controls provided?
				Moving Parts Hazards 1. Are safeguards provided for all hazardous moving parts of the machine including auxiliary parts?
				Non-Mechanical Hazards 1. Have appropriate measures been taken to safeguard workers against noise hazards? 2. Have special guards, enclosures, or personal protective equipment been provided, where necessary, to protect workers from exposure to harmful substances used in machine operation?
				Electric Hazards 1. Is the machine installed in accordance with National Fire Protection Association and National Electrical Code requirements? 2. Are there loose conduit fittings? 3. Is the machine properly grounded? 4. Is the power supply correctly fused and protected? 5. Do workers occasionally receive minor shocks while operating any of the machines?
				Employee Training 1. Do operators and maintenance workers have the necessary training in how to use the safeguards and why? 2. Have operators and maintenance workers been trained in where the safeguards are located, how they provide protection, and what hazards they protect against? 3. Have operators and maintenance workers been trained in how and under what circumstances guards can be removed? 4. Have workers been trained in the procedures to follow if they notice guards that are damaged, missing, or inadequate?

				Protective Equipment and Proper Clothing 1. Is protective equipment required? 2. If protective equipment is required, is it appropriate for the job, in good condition, kept clean and sanitary, and stored carefully when not in use? 3. Is the operator dressed safely for the job (no loose-fitting clothing or jewelry)?
				Machinery Maintenance and Repair 1. Have maintenance workers received up-to-date instruction on the machines they service? 2. Do maintenance workers lock out the machine from its power sources before beginning repairs? 3. Where several maintenance persons work on the same machine, are multiple lockout devices used? 4. Do maintenance persons use appropriate and safe equipment in their repair work? 5. Is the maintenance equipment itself properly guarded? 6. Are maintenance and servicing workers trained in the requirements of 29 CFR 1910.147, lockout/tagout hazard, and do the procedures for lockout/tagout exist before they attempt their tasks?

Use a separate form for each piece of equipment

Personal Protective Equipment

Purpose

The Sierra Packaging and Converting, LLC provides all Employees with required PPE to suit the task and known hazards. This Chapter covers the requirements for Personal Protective Equipment with the exception of PPE used for hearing conservation and respiratory protection or PPE required for hazardous material response to spills or releases, which if applicable are covered under separate programs.

The [Safety Manager Name], Safety Manager is the program coordinator, acting as the representative of the plant manager, who has overall responsibility for the program. The Safety Manager will designate appropriate plant supervisors to assist in training employees and monitoring their use of PPE. This written plan is kept in the Safety Manager's office. Then he/she will review and update the program as necessary. Copies of this program may be obtained from the Safety Manager's office.

We at Sierra Packaging and Converting, LLC believe it is our obligation to provide a hazard free environment to our employees. Any employee encountering hazardous conditions must be protected against the potential hazards. The purpose of protective clothing and equipment (PPE) is to shield or isolate individuals from chemical, physical, biological, or other hazards that may be present in the workplace. (See separate documents for respiratory protection and hearing conservation programs.)

Establishing an overall written PPE program detailing how employees use PPE makes it easier to ensure that they use PPE properly in the workplace and document our PPE efforts in the event of an OSHA inspection. Sierra Packaging and Converting, LLC's PPE program covers:

- Purpose
- Hazard assessment
- PPE selection
- Employee training
- Cleaning and maintenance of PPE
- PPE specific information

If after reading this program, you find that improvements can be made, please contact the Safety Manager, [Safety Manager Name]. We encourage all suggestions because we are committed to the success of our Personal Protective Equipment Program. We strive for

clear understanding, safe behavior, and involvement in the program from every level of the company.

General Policy

Engineering controls shall be the primary methods used to eliminate or minimize hazard exposure in the workplace. When such controls are not practical or applicable, personal protective equipment shall be employed to reduce or eliminate personnel exposure to hazards. Personal protective equipment (PPE) will be provided, used, and maintained when it has been determined that its use is required and that such use will lessen the likelihood of occupational injuries and/or illnesses.

Responsibilities

The Safety Manager will be responsible for assessing the hazards and exposures that may require the use of PPE, determining the type of equipment to be provided, and purchasing the equipment. Input from managers, supervisors, and employees will be obtained and considered in selecting appropriate equipment.

Managers/supervisors will be responsible for training employees in the use and proper care of PPE, ensuring that all employees are assigned appropriate PPE, and ensuring that PPE is worn by employees when and where it is required.

Employees are responsible for following all provisions of this program and related procedures. They are expected to wear PPE when and where it is required.

Hazard Assessment

The Company will perform an assessment of the workplace to determine if hazards are present, or likely to be present, which necessitate the use of personal protective equipment (PPE). This assessment will consist of a survey of the workplace to identify sources of hazards to workers. Consideration will be given to hazards such as impact, penetration, laceration, compression (dropping heavy objects on foot, roll-over, etc.), chemical exposures, harmful dust, heat, light (optical) radiation, electrical hazards, noise, etc. If such hazards are identified, the following will be done.

- Select and have each affected employee use the proper PPE.
- Explain selection decisions to each affected employee.
- Select PPE that properly fits each affected employee.

Defective & Damaged Equipment

Defective or damaged personal protective equipment shall not be used.

Training

All Employees who are required to use PPE shall be trained to know at least the following:

- When PPE is necessary;
- What PPE is necessary;
- How to properly don, remove, adjust, and wear PPE;
- The limitations of the PPE
- The proper care, maintenance, useful life and disposal of the PPE.

Each affected Employee shall demonstrate an understanding of the training and the ability to use PPE properly, before being allowed to perform work requiring the use of PPE.

Certification of training for PPE is required by OSHA and shall be accomplished by using the *Job Safety Checklist* to verify that each affected Employee has received and understood the required PPE training.

PPE Selection

Controlling hazards.

PPE devices alone should not be relied on to provide protection against hazards, but should be used in conjunction with guards, engineering controls, and sound manufacturing practices.

Selection guidelines.

The general procedure for selection of protective equipment is to:

a) become familiar with the potential hazards and the type of protective equipment that is available, and what it can do; i.e., splash protection, impact protection, etc.;

b) compare the hazards associated with the environment; i.e., impact velocities, masses, projectile shape, radiation intensities, with the capabilities

of the available protective equipment;

c) select the protective equipment which ensures a level of protection greater than the minimum required to protect employees from the hazards

d) fit the user with the protective device and give instructions on care and use of the PPE. It is very important that end users be made aware of all warning labels for and limitations of their PPE.

Fitting the Device

Careful consideration must be given to comfort and fit. PPE that fits poorly will not afford the necessary protection. Continued wearing of the device is more likely if it fits the wearer comfortably. Protective devices are generally available in a variety of sizes. Care should be taken to ensure that the right size is selected.

Devices with Adjustable Features

Adjustments should be made on an individual basis for a comfortable fit that will maintain the protective device in the proper position. Particular care should be taken in fitting devices for eye protection against dust and chemical splash to ensure that the devices are sealed to the face. In addition, proper fitting of helmets is important to ensure that it will not fall off during work operations. In some cases a chin strap may be necessary to keep the helmet on an employee's head. (Chin straps should break at a reasonably low force, however, so as to prevent a strangulation hazard). Where manufacturer's instructions are available, they should be followed carefully.

Eye & Face Protection

The majority of occupational eye injuries can be prevented by the use of suitable/approved safety spectacles, goggles, or shields. Approved eye and face protection shall be worn when there is a reasonable possibility of personal injury.

- Each employee shall 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.
- Each employee shall use eye protection that provides side protection when there is a hazard from flying objects. Detachable side protectors are acceptable.
- Each employee who wears prescription lenses while engaged in operations

that involve eye hazards shall wear eye protection that incorporates the prescription in its design, or shall wear eye protection that can be worn over the prescription lenses without disturbing the proper position of the prescription lenses or the protective lenses.

- Eye and face PPE shall be distinctly marked to facilitate identification of the manufacturer.
- Each employee shall use equipment with filter lenses that have a shade number appropriate for the work being performed for protection from injurious light radiation.

Typical hazards that can cause eye and face injury are:

- Splashes of toxic or corrosive chemicals, hot liquids, and molten metals;
- Flying objects, such as chips of wood, metal, and stone dust;
- Fumes, gases, and mists of toxic or corrosive chemicals; and
- Aerosols of biological substances.

Prevention of eye accidents requires that all persons who may be in eye hazard areas wear protective eyewear. This includes employees, visitors, contractors, or others passing through an identified eye hazardous area. To provide protection for these personnel, activities shall procure a sufficient quantity of heavy duty goggles and/or plastic eye protectors which afford the maximum amount of protection possible. If these personnel wear personal glasses, they shall be provided with a suitable eye protector to wear over them.

Eye &Face Protection Specs

Eye and face protectors procured, issued to, and used by employees, contractors and visitors must conform to the following design and performance standards:

a) Provide adequate protection against the particular hazards for which they are designed

b) Fit properly and offer the least possible resistance to movement and cause minimal discomfort while in use.

c) Be durable.

d) Be easily cleaned or disinfected for or by the wearer.

e) Be clearly marked to identify the manufacturer.

f) Persons who require corrective lenses for normal vision, and who are required

to wear eye protection, must wear goggles or spectacles of one of the following types:

1) Spectacles with protective lenses which provide optical correction.

2) Goggles that can be worn over spectacles without disturbing the adjustment of the spectacles.

3) Goggles that incorporate corrective lenses mounted behind the protective lenses.

Eye & Face PPE Use

Safety Spectacles. Protective eye glasses are made with safety frames, tempered glass or plastic lenses, temples and side shields which provide eye protection from moderate impact and particles encountered in job tasks such as carpentry, woodworking, grinding, scaling, etc.

Single Lens Goggles. Vinyl framed goggles of soft pliable body design provide adequate eye protection from many hazards. These goggles are available with clear or tinted lenses, perforated, port vented, or non-vented frames. Single lens goggles provide similar protection to spectacles and may be worn in combination with spectacles or corrective lenses to insure protection along with proper vision.

Welders/Chippers Goggles. These goggles are available in rigid and soft frames to accommodate single or two eye piece lenses.

1) Welders goggles provide protection from sparking, scaling or splashing metals and harmful light rays. Lenses are impact resistant and are available in graduated shades of filtration.

2) Chippers/grinders goggles provide eye protection from flying particles. The dual protective eye cups house impact resistant clear lenses with individual cover plates.

Face Shields. These normally consist of an adjustable headgear and face shield of tinted/transparent acetate or polycarbonate materials, or wire screen. Face shields are available in various sizes, tensile strength, impact/heat resistance and light ray filtering capacity. Face shields will be used in operations when the entire face needs protection and should be worn to protect eyes and face against flying particles, metal sparks, and chemical/ biological splash.

Welding Shields. These shield assemblies consist of vulcanized fiber or glass fiber body, a ratchet/button type adjustable headgear or cap attachment and a filter and cover plate holder. These shields will be provided to protect workers' eyes and face

from infrared or radiant light burns, flying sparks, metal spatter and slag chips encountered during welding, brazing, soldering, resistance welding, bare or shielded electric arc welding and oxyacetylene welding and cutting operations.

Filter Lenses for Protection Against Radiant Energy			
Operations	**Electrode Size 1/32 in**	**Arc Current**	**Protective Shade**
Shielded metal arc welding	Less than 3	Less than 60	7
	3-5	60-160	8
	5-8	160-250	10
	More than 8	250-550	11
Torch brazing			3
Torch soldering			2
Note: as a rule of thumb, start with a shade that is too dark to see the weld zone. Then go to a lighter shade which gives sufficient view of the weld zone without going below the minimum. In oxyfuel gas welding or cutting where the torch produces a high yellow light, it is desirable to use a filter lens that absorbs the yellow or sodium line in the visible light of the (spectrum) operation.			

Selection chart guidelines for eye and face protection		
The following chart provides general guidance for the proper selection of eye and face protection to protect against hazards associated with the listed hazard "source" operations.		
Source	***Hazard***	***Protection***
IMPACT - Chipping, grinding machining, masonry work, woodworking, sawing, drilling, chiseling, powered fastening, riveting, and sanding	Flying fragments, objects, large chips, particles, sand, dirt, etc.	Spectacles with side protection, goggles, face shield For severe exposure, use face shield
HEAT-Furnace operation and arc welding	Hot sparks	Faceshields,, spectacles with side. For severe exposure use faceshield.

CHEMICALS-Acid and chemical handling, degreasing, plating	Splash	Goggles, eyecup and cover types. For severe exposure, use face shield.
DUST - Woodworking, buffing, general,buffing, general dusty conditions.	Nuisance dust	Goggles, eye cup and cover type

Head Protection

Hats and caps have been designed and manufactured to provide workers protection from impact, heat, electrical and fire hazards. These protectors consist of the shell and the suspension combined as a protective system. Safety hats and caps will be of nonconductive, fire and water resistant materials. Bump caps or skull guards are constructed of lightweight materials and are designed to provide minimal protection against hazards when working in congested areas.

Head protection will be furnished to, and used by, all employees and contractors engaged in construction and other miscellaneous work in head-hazard areas. Head protection will also be required to be worn by engineers, inspectors, and visitors at construction sites. Bump caps/skull guards will be issued to and worn for protection against scalp lacerations from contact with sharp objects. They will not be worn as substitutes for safety caps/hats because they do not afford protection from high impact forces or penetration by falling objects.

Head Protection Selection

All head protection is designed to provide protection from impact and penetration hazards caused by falling objects. Head protection is also available which provides protection from electric shock and burn. When selecting head protection, knowledge of potential electrical hazards is important. Class A helmets, in addition to impact and penetration resistance, provide electrical protection from low-voltage conductors (they are proof tested to 2,200 volts). Class B helmets, in addition to impact and penetration resistance, provide electrical protection from high-voltage conductors (they are proof tested to 20,000 volts). Class C helmets provide impact and penetration resistance (they are usually made of aluminum which conducts electricity), and should not be used around electrical hazards.

Where falling object hazards are present, helmets must be worn. Some examples

include: working below other workers who are using tools and materials which could fall; working around or under conveyor belts which are carrying parts or materials; working below machinery or processes which might cause material or objects to fall; and working on exposed energized conductors.

Foot Protection

Each affected employee shall wear protective footwear when working in areas where there is a danger of foot injuries due to falling or rolling objects, or objects piercing the sole, and where employee's feet are exposed to electrical hazards.

Selecting Foot PPE

Safety shoes and boots provide both impact and compression protection. Where necessary, safety shoes can be obtained which provide puncture protection. In some work situations, metatarsal protection should be provided, and in other special situations electrical conductive or insulating safety shoes would be appropriate. Safety shoes or boots with impact protection would be required for carrying or handling materials such as packages, objects, parts or heavy tools, which could be dropped; and, for other activities where objects might fall onto the feet. Safety shoes or boots with compression protection would be required for work activities involving skid trucks (manual material handling carts) around bulk rolls (such as paper rolls) and around heavy pipes, all of which could potentially roll over an employee's feet. Safety shoes or boots with puncture protection would be required where sharp objects such as nails, wire, tacks, screws, large staples, scrap metal etc., could be stepped on by employees causing a foot injury.

Hand Protection

Hand protection is required when employees' hands are exposed to hazards such as those from skin absorption of harmful substances; severe cuts or lacerations; severe abrasions; punctures; chemical burns; thermal burns; and harmful temperature extremes.

Skin contact is a potential source of exposure to toxic materials; it is important that the proper steps be taken to prevent such contact. Gloves should be selected on the basis of the material being handled, the particular hazard involved, and their suitability for the

operation being conducted. One type of glove will not work in all situations.

Most accidents involving hands and arms can be classified under four main hazard categories: chemicals, abrasions, cutting, and heat. There are gloves available that can protect workers from any of these individual hazards or combination of hazards.

Gloves should be replaced periodically, depending on frequency of use and permeability to the substance(s) handled. Gloves overtly contaminated should be rinsed and then carefully removed after use.

Gloves should also be worn whenever it is necessary to handle rough or sharp-edged objects, and very hot or very cold materials. The type of glove materials to be used in these situations include leather, welder's gloves, aluminum-backed gloves, and other types of insulated glove materials.

Careful attention must be given to protecting your hands when working with tools and machinery. Power tools and machinery must have guards installed or incorporated into their design that prevent the hands from contacting the point of operation, power train, or other moving parts. To protect the hands from injury due to contact with moving parts, it is important to:

- Ensure that guards are always in place and used.
- Always lock out machines or tools and disconnect the power before making repairs.
- Treat a machine without a guard as inoperative; and
- Do not wear gloves around moving machinery, such as drill presses, mills, lathes, and grinders.

Selecting Hand PPE

Selection of hand PPE shall be based on an evaluation of the performance characteristics of the hand protection relative to the task(s) to be performed, conditions present, duration of use, and the hazards and potential hazards identified. Gloves are often relied upon to prevent cuts, abrasions, burns, and skin contact with chemicals that are capable of causing local or systemic effects following dermal exposure. There is no glove that provides protection against all potential hand hazards, and commonly available glove materials provide only limited protection against many chemicals. Therefore, it is important to select the

most appropriate glove for a particular application and to determine how long it can be worn, and whether it can be reused. It is also important to know the performance characteristics of gloves relative to the specific hazard anticipated; e.g., chemical hazards, cut hazards, flame hazards, etc. Before purchasing gloves, request documentation from the manufacturer that the gloves meet the appropriate test standard(s) for the hazard(s) anticipated. Other factors to be considered for glove selection in general include:

(A) As long as the performance characteristics are acceptable, in certain circumstances, it may be more cost effective to regularly change cheaper gloves than to reuse more expensive types.

(B) The work activities of the employee should be studied to determine the degree of dexterity required, the duration, frequency, and degree of exposure of the hazard, and the physical stresses that will be applied.

Chemical Hazards

The first consideration in the selection of gloves for use against chemicals is to determine, if possible, the exact nature of the substances to be encountered. Read instructions and warnings on chemical container labels and MSDSs before working with any chemical. Recommended glove types are often listed in the section for personal protective equipment.

All glove materials are eventually permeated by chemicals. However, they can be used safely for limited time periods if specific use and glove characteristics (i.e., thickness and permeation rate and time) are known. The safety office can assist is determining the specific type of glove material that should be worn for a particular chemical.

(A) The toxic properties of the chemical(s) must be determined; in particular, the ability of the chemical to cause local effects on the skin and/or to pass through the skin and cause systemic effects.

(B) Generally, any "chemical resistant" glove can be used for dry powders;

(C) For mixtures and formulated products (unless specific test data are available), a glove should be selected on the basis of the chemical component with the shortest breakthrough time, since it is possible for solvents to carry active ingredients through polymeric materials.

(D) Employees must be able to remove the gloves in such a manner as to prevent skin contamination.

Appendices

PPE Hazard Assessment Form

Certification of Hazard Assessment

Date of Hazard Assessment: _____

Person Certifying Hazard Assessment: _____

Title: _____

Task	Hazard	PPE Required	Department(s)	Comments

Housekeeping & Material Storage

Good housekeeping is a necessary requirement for maintaining safety in all work areas. Clean and tidy work areas hold fewer hazards for all employees. Accidents and injuries are avoided and productivity improved where good housekeeping is a daily occurrence. This document informs interested persons, including employees, that our company is complying with OSHA's housekeeping requirements.

Many regulations lead to housekeeping procedures. Common sense and safety concerns encourage standardization of housekeeping measures in the workplace. Sierra Packaging and Converting, LLC has developed a set of written housekeeping procedures. In this way we have standardized housekeeping measures and are providing clear expectations and procedures for housekeeping at our company.

Good housekeeping is possibly the most visible evidence of management and employee concern for safety and health that a company displays on a day-to-day basis. Orderliness in our workplace contributes to a safe working environment by minimizing obstacles and potential safety and health threats such as spills, trip hazards, etc. In fact, we have nine good reasons for housekeeping:

1. Prevents accidents
2. Prevents fire
3. Saves time
4. Gives control to our workers
5. Increases production
6. Gives our workers the freedom to move
7. Gives our workers pride
8. Protects our products and equipment
9. Reduces our waste.

Our Written Housekeeping Program begins with a purpose statement. Then it provides a section to explain our expectations for a walk-around assessment. We have also included specific housekeeping procedures. Because no program can be successful without employee participation, we train our employees in the procedures. Plus, we have a system to promptly address and resolve any housekeeping-related accidents and hazard reports.

Purpose Statement

This document serves as the written procedures for general housekeeping at Sierra

Packaging and Converting, LLC. These guidelines provide housekeeping standards in this facility to help ensure a safe work environment at all times in all areas.

Administrative Duties

[Safety Manager Name], Safety Manager, is responsible for developing and maintaining the program. A copy of the plan may be reviewed by employees. It is located in the Safety Manager's Office. In addition, each Supervisor is responsible for maintaining any records related to the housekeeping program.

If after reading this program, you find that improvements can be made, please contact [Safety Manager Name], Safety Manager. We encourage all suggestions because we are committed to the success of our written housekeeping program.
We strive for clear understanding, safe behavior, and involvement from every level of the company.

Walk-Around Assessment

Every week the Safety Manager and/or Supervisors walk(s) around the facility for an assessment to identify main housekeeping issues. These persons look for a lack of order, unremoved spills or obstructions, or other hazards due to poor organization or poor housekeeping. They ask employees working in each area to identify and recommend corrective actions for their area. They also walk around the grounds to see if there is refuse or an untidy appearance due to storing materials haphazardly. In addition, they check the OSHA Form 300 injury and illness records (which are located Safety Manager's office) to see if one or more incidents such as slips, trips, falls, or other types of accidents were related in some way to poor housekeeping.

Responsibilities

All Employees share the responsibility for maintaining good housekeeping practice and following the established housekeeping procedures. The Safety Manager, each Supervisor and Safety Committee will be responsible to monitor housekeeping as part of their facility safety inspection procedures, note any hazards or areas of non-compliance, initiate clean-up procedures and provide follow-up. Management has the additional responsibility to provide disciplinary action when necessary to reinforce compliance with this program.

Smoking Policy

Smoking is not permitted inside buildings and/or within 50 feet of material storage. Smoking is "strictly" prohibited on some specific work sites. The Safety Manager and/or

each Supervisor are responsible for assessing the hazards of each site and designating smoking areas. Smoking is permitted outside in designated areas and in the Smoking Section of authorized break areas before work, after work and during breaks. To prevent fires and keep the grounds neat and orderly, all cigarette/cigar ashes and butts are to be disposed in the provided butt cans or ash-trays only.

Main Facility and Work Area Housekeeping Procedures

Office areas are to be kept neat and orderly. The following general rules apply to prevent injuries and maintain a professional appearance.

1. All aisles, emergency exits, fire extinguishers, etc., will be kept clear (a minimum of three feet of either side) of material storage (temporary and permanent) at all times.
2. Storage areas will be maintained orderly at all times. When supplies are received, the supplies will be stored properly.
3. Spills will be cleaned-up immediately and wastes disposed of properly.
4. All waste receptacles will be lined with a plastic trash bag to avoid direct contact while handling. Custodial Employees will use rubber gloves and compaction bar when handling wastes.
5. Keep file and desk drawers closed when not attended to avoid injuries. Open only one drawer at a time to prevent tipping of file cabinets.
6. At the end of the business day, turn off all office equipment (area heaters, lamps, coffee-maker, PCs, etc.) and lights to save energy and prevent fires. All space heaters must be un-plugged at the end of the day to assure they have been turned-off.

Work areas will be kept neat and orderly, during operations and as follows:

1. All aisles, emergency exits, fire extinguishers, eye wash stations, etc., will be kept clear (a minimum of three feet in front of and to either side) of product storage, material storage, fork trucks and pallet jacks at all times.
2. Spills will be cleaned up immediately.
3. All process leaks will be reported to supervision and maintenance for immediate repair and clean-up.
4. Utility Employees will be responsible to keep aisles and work floors clear of excessive debris and waste materials during shift operation, between breaks and

at shift change when necessary or directed by supervision; however, all Employees are responsible to communicate slippery floors to supervision for immediate clean-up.

5. All refuse and waste materials will be placed in the recognized waste containers for disposal.

Restrooms and break areas are provided as a convenience for all Employees.

The following rules will apply:

1. Employees are expected to clean-up after themselves as a common courtesy to fellow Employees.
2. Flammable materials (fire works, explosives, gasoline, etc.) may not be stored in break areas or brought on company property.
3. Personal food item will not be stored in break areas overnight.
4. All waste receptacles will be lined with a plastic trash bag to avoid direct contact while handling and Custodial Employees will use rubber gloves and compaction bar when handling wastes.
5. All refuse and waste materials will be placed in the recognized waste containers for disposal.

Maintenance Areas

1. All aisles, emergency exits, fire extinguishers, etc., will be kept clear (a minimum of three feet of either side) of material storage (temporary and permanent) at all times.
2. Storage Areas will be maintained orderly at all times:
   a. Pipe stock stored horizontally on racks and sorted by size
   b. Metal stock stored horizontally on racks and sorted by size
   c. Sheet metal stock stored vertically in racks and sorted by type
   d. All fittings, etc., stored in bins on shelves and sorted by type and use
   e. All flammables stored in OSHA-approved Fire Cabinets and self-closing cans where necessary
3. Spills will be cleaned-up immediately by the person responsible and wastes disposed properly.
4. All refuse and waste materials will be placed in the recognized waste containers for disposal.

Grounds

The grounds surrounding our main facility and worksites are an extension of the work place. Grounds that are kept neat and orderly show pride by the Company for Employees, customers and neighbors to enjoy.

The following general rules will apply:

1. Keep the parts of buildings that are visible to public roads cleaned by washing them at regular intervals.

2. Keep the other parts of buildings cleaned at regular intervals.

3. Keep all doors and loading docks completely free of debris, shrubs, or other obstructions.

4. Maintain visibility through all windows by washing at regular intervals.

5. Keep doors and windows properly maintained in good working order.

6. Repair any damage to doors and windows at regular intervals.

7. All trash will be discarded only in the waste containers provided.

8. Park only in the designated assigned area.

9. The Maintenance Department will be responsible for grounds keeping (mowing, trimming, etc.) as needed. Maintenance will also establish procedures for ice/snow removal, when necessary, prior to operations each day.

10. Provide any stairs or platforms adjacent to or leading into the building(s) with adequate rails, adequate treads to climb, and an area clean and free of materials.

11. Keep grounds neat and orderly, free of refuse and unnecessary materials.

12. Store materials outdoors only in designated areas of the grounds.

13. Provide designated walkways through grounds, preferably paved and kept clear of snow, ice, materials, or any other physical hazards.

14. Provide a lighting system that is adequate to allow employees to navigate around the grounds as necessary at dusk and after dark.

15. Maintain a neat landscaping appearance--trim lawn, trees and shrubs in such a way as to minimize any possible safety hazards.

16. Trim grass short enough to prevent trip hazards to employees.

17. Prevent trees and shrubs from obstructing doors and windows.

Material Storage

Proper storage procedures are required for dry, raw materials, flammables and compressed gases storage to prevent fires, keep exits and aisles clear and avoid injuries and illnesses. General rules for material storage are as follows:

Materials Storage

1. Materials may not be stored any closer than 18 inches to walls or sprinkler heads. A minimum of 3 feet side clearance will be maintained around doorways and emergency exits. Passageways and aisle will be properly marked and a minimum of six feet in width. Materials, fork lifts, pallet jacks, etc., may not be stored in aisles or passageways.
2. Aisles and passageways will be kept clear of debris. All spills of materials will be immediately cleaned-up by the person responsible.
3. All platforms and racks will have maximum load capacity displayed. The weight of stored material will not exceed the rated load capacity.

Flammable Storage

1. All flammables will be stored in OSHA-approved flammable storage cabinets or stored outside (at least 50 feet from any structure)
2. Fuels, solvents and other flammables (not stored in original shipping containers) will be stored in OSHA-approved self-closing containers with flame arresters. Flammables may not be stored in open containers (open parts baths, etc.).
3. Flammable storage areas will be kept dry and well ventilated. No storage of combustible materials, open flames or exposed electrical components are permitted in the flammable storage area.
4. Flammable or combustible materials may not be stored in electrical rooms. Electrical rooms must be kept clean and dry at all times.

Compressed Gas Storage Safety

Gas Cylinder Shipment Receiving

1. Inspect bottle for defects & proper marking/labels
2. Ensure stamped date on bottle has not expired
3. Inspect valve assembly and adapter thread area
4. Ensure MSDS is on file or with shipment
5. Follow MSDS requirements for storage

Gas Cylinder Storage

1. Cylinder cap securely in place when not in use.
2. Marked with contents and if empty/full.
3. Stored up-right and secured to a stationary structure in an shaded and well ventilated area.
4. Cylinders not stored within 50 feet of exposed electrical components or combustible materials.
5. Cylinders are protected from accidental rupture.
6. Chemically reactive gases not stored within 50 feet of each other.

Gas Cylinder Movement

1. Must be secured to a cart or cylinder trolley
2. Cap securely fastened

Gas Cylinder Usage

1. Inspect valve adapter threads.
2. Inspect all fasteners, hoses & regulators prior to hooking up to cylinder.
3. Use only for approved purposes.
4. Use in up-right position.
5. Fasten cylinder to structure or cart.
6. Regulators must be of same rated pressure as cylinder

7. Keep cylinder valve shut when not in use; don't depend on regulators

Fire Prevention Plan

Purpose

The Company Fire Safety Plan has been developed to work in conjunction with company emergency plans and other safety programs. This includes reviewing all new building construction and renovations to ensure compliance with applicable state, local, and national fire and life safety standards. Fire prevention measures reduce the incidence of fires by eliminating opportunities for ignition of flammable materials.

This FPP is in place at this company to control and reduce the possibility of fire and to specify the type of equipment to use in case of fire. This plan addresses the following issues:

- Major workplace fire hazards and their proper handling and storage procedures.
- Potential ignition sources for fires and their control procedures.
- The type of fire protection equipment or systems which can control a fire involving them.
- Regular job titles of personnel responsible for maintenance of equipment and systems installed to prevent or control ignition of fires and for control of fuel source hazards.

Under this plan, our employees will be informed of the plan's purpose, preferred means of reporting fires and other emergencies, types of evacuations to be used in various emergency situations, and the alarm system. The plan is closely tied to our emergency action plan where procedures are described for emergency escape procedures and route assignments, procedures to account for all employees after emergency evacuation has been completed, rescue and medical duties for those employees who perform them. Please see the emergency action plan for this information.

[Safety Manager Name], Safety Manager, is the program coordinator, who has overall responsibility for the plan. The written program is kept in Safety Manager's office. He will review and update the plan as necessary. Copies of this plan may be obtained in the Safety Manager's office.

The FPP communicates to employees, policies and procedures to follow when fires erupt. This written plan is available, upon request, to employees, their designated representatives,

and any OSHA officials who ask to see it.

If after reading this program, you find that improvements can be made, please contact [Safety Manager Name], Safety Manager. We encourage all suggestions because we are committed to the success of our emergency action plan. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Safety Manager Responsibilities

Here at Sierra Packaging and Converting, LLC, the Safety Manager is responsible for the following activities. He must:

1. Develop a written fire prevention plan for regular and after-hours work conditions.

2. Immediately notify the local fire department fire or police departments, and the building owner/superintendent in the event of a fire affecting the office.

3. Integrate the fire prevention plan with the existing general emergency plan covering the building occupied.

4. Distribute procedures for reporting a fire, the location of fire exits, and evacuation routes to each employee.

5. Conduct drills to acquaint the employees with fire procedures, and to judge their effectiveness.

6. Satisfy all local fire codes and regulations as specified.

7. Train designated employees in the use of fire extinguishers and the application of medical first-aid techniques.

8. Keep key management personnel home telephone numbers in a safe place in the office for immediate use in the event of a fire. Distribute a copy of the list to key persons to be retained in their homes for use in communicating a fire occurring during non-work hours.

9. Decide to remain in or evacuate the workplace in the event of a fire.

10. If evacuation is deemed necessary, the safety manager ensures that:

    - All employees are notified and a head count is taken to confirm total

evacuation of all employees.

- When practical, equipment is placed and locked in storage rooms or desks for protection.

- The building owner/superintendent is contacted, informed of the action taken, and asked to assist in coordinating security protection.

- In locations where the building owner/superintendent is not available, security measures to protect employee records and property are arranged as necessary.

Workplace Fire Hazards

It is the intent of this company to assure that hazardous accumulations of combustible waste materials are controlled so that a fast developing fire, rapid spread of toxic smoke, or an explosion will not occur. Employees are to be made aware of the hazardous properties of materials in their workplaces, and the degree of hazard each poses.

Fire prevention measures must be developed for all fire hazards found. Once employees are made aware of the fire hazards in their work areas, they must be trained in the fire prevention measures developed and use them in the course of their work. For example, oil soaked rags must be treated differently than general paper trash in office areas. In addition, large accumulations of waste paper or corrugated boxes, etc., can pose a significant fire hazard. Accumulations of materials which can cause large fires or generate dense smoke that are easily ignited or may start from spontaneous combustion, are the types of materials with which this fire prevention plan is concerned. Such combustible materials may be easily ignited by matches, welder's sparks, cigarettes and similar low level energy ignition sources. It is the intent of this company to prevent such accumulation of materials.

Certain equipment is often installed in workplaces to control heat sources or to detect fuel leaks. An example is a temperature limit switch often found on deep-fat food fryers found in restaurants. There may be similar switches for high temperature dip tanks, or flame failure and flashback arrester devices on furnaces and similar heat producing equipment. If these devices are not properly maintained or if they become inoperative, a definite fire hazard exists. Again employees and supervisors should be aware of the specific type of control devices on equipment involved with combustible materials in the workplace and should make sure, through periodic inspection or testing, that these controls are operable. Manufacturer's recommendations should be followed to assure proper maintenance procedures.

Fuel is used throughout the building and work areas/sites as an energy source for various

systems or equipment. This fuel can be a significant fire hazard and must be monitored and controlled. Flammables are stored is safe, approved areas away from flames, sparks, heat, or other ignition sources.

Potential Ignition Sources

Flammable or combustible materials may not ignite on their own without an external source of ignition.

Many of the thousands of chemicals in use in the workplace are both highly toxic and highly volatile. Extreme caution must be used to prevent and fight fires resulting from chemical spills and accidents. Chemicals can cause serious injuries through physical (fire or explosion) or health (burns or poisons) hazards. Chemicals are classified by the inherent properties that make them hazardous.

Flammable - these chemicals catch fire very easily; hazards include property damage, burns and injuries that result when toxic and corrosive compounds are released into the air.

Reactive - a reactive material is one that can undergo a chemical reaction under certain conditions; reactive substances can burn, explode, or release toxic vapor if exposed to other chemicals, air or water.

Explosive - an explosive is a substance that undergoes a very rapid chemical change producing large amounts of gas and heat; explosions can also occur as a result of reactions between chemicals not ordinarily considered explosive.

The National Fire Protection Association (NFPA) has classified four general types of fires, based on the combustible materials involved and the kind of extinguisher needed to put them out. The four fire classifications are A, B, C and D.

Class A. This type of fire is the most common. The combustible materials are wood, cloth, paper, rubber and plastics. The common extinguisher agent is water, but dry chemicals are also effective. Carbon dioxide extinguishers and those using sodium or potassium bicarbonate chemicals are not to be used on this type of fire.

Class B. Flammable liquids, gases and greases create class B fires. The extinguishers to use are foam, carbon dioxide and dry chemical. Also, water fog and vaporizing liquid extinguishers can be used.

Class C. Class C fires are electrical fires and a non-conducting agent must be used.

Carbon dioxide and dry chemical extinguishers are to be used. Never use foam or water-type extinguishers on these fires.

Class D. Combustible metals, such as magnesium, titanium, zirconium and sodium fires are class D. These fires require specialized techniques to extinguish them. None of the common extinguishers should be used since they can increase the intensity of the fire by adding an additional chemical reaction.

There are only two dry chemical extinguishers that can be used on A, B, and C fires, and those are multi-purpose ABC extinguishers, either stored pressure or cartridge operated. Multi-purpose extinguishers (ABC) will handle all A, B, and C fires. All fire extinguishers are labeled with either ABC, or A, or B, or C.

Type of Fire: A, combustibles like wood, paper, etc.
Type of Extinguisher: A or ABC, water or dry chemicals

Type of Fire: B, flammable liquids, gases and greases
Type of Extinguisher: B or ABC, foam, carbon dioxide, dry chemicals

Type of Fire: C, electrical fires
Type of Extinguisher: C or ABC, non-conducting agent such as carbon dioxide and dry chemicals

Type of Fire: D, combustible metals such as titanium and sodium.
Type of Extinguisher: This type of fire calls for specialized techniques for which the fire department will be called.

Maintenance of Fire Protection Equipment

Once hazards are evaluated and equipment is installed to control them, that equipment must be monitored on a regular basis to make sure it continues to function properly. The following personnel are responsible for maintaining equipment and systems installed to prevent or control fires: [Safety Manager Name], Safety Manager.

These individuals follow strict guidelines for maintaining the equipment.
Fire extinguishers are inspected on a monthly basis with each receiving an annual hydrostatic test.

Housekeeping Procedures

Our company controls accumulations of flammable and combustible waste materials and residues so that they do not contribute to a fire.

The following procedures have been developed to eliminate or minimize the risk of fire due to improperly stored or disposed of materials.

1. All aisles, emergency exits, fire extinguishers, eye wash stations, etc., will be kept clear (a minimum of three feet in front of and to either side) of product storage, material storage, fork trucks and pallet jacks at all times.

2. Storage areas will be maintained orderly at all times. When supplies are received, the supplies will be stored properly.

3. Spills will be cleaned-up immediately and wastes disposed of properly.

4. All process leaks will be reported to supervision and maintenance for immediate repair and clean-up.

5. All refuse and waste materials will be placed in the recognized waste containers for disposal keeping floor free of paper or saw dust, storing oily rags in specially designed containers, storing all flammables in fire cabinets when not in use

6. At the end of the business day, turn off all office equipment (area heaters, lamps, coffee-maker, PCs, etc.) and lights to save energy and prevent fires. All space heaters be un-plugged at the end of the day to assure they have been turned-off.

Training

At the time of a fire, employees should know what type of evacuation is necessary and what their role is in carrying out the plan. In cases where the fire is large, total and immediate evacuation of all employees is necessary. In smaller fires, a partial evacuation of nonessential employees with a delayed evacuation of others may be necessary for continued plant operation. We must be sure that employees know what is expected of them during a fire to assure their safety.

This document is not one for which casual reading is intended or will suffice in getting the message across. If passed out as a statement to be read to oneself, some employees will choose not to read it, or will not understand the plan's importance.
In addition, training on the plan's content is required by OSHA.

A better method of communicating the fire prevention plan is to give all employees a thorough briefing and demonstration. Sierra Packaging and Converting, LLC has chosen to train employees through presentation followed by a drill. Our local fire department requires one or more fire drill(s) each year, so we cover related FPP information at that time.

A better method of communicating the fire prevention plan is to give all employees a thorough briefing and demonstration. [Safety Manager Name] has all managers and supervisors present the plan to their staffs in small meetings.

Training, conducted on initial assignment, includes:

- What to do if employee discovers a fire
- Demonstration of alarm, if more than one type exists
- How to recognize fire exits
- Evacuation routes
- Assisting employees with disabilities
- Measures to contain fire (e.g., closing office doors, windows, etc. in immediate vicinity)
- Head count procedures (see EAP for details)
- Return to building after the "all-clear" signal

The employer must inform employees of the fire hazards of the materials and processes to which they are exposed.

The employer shall review with each employee upon initial assignment those parts of the fire prevention plan which the employee must know to protect the employee in the event of an emergency.

The written plan shall be kept in the workplace and made available for employee review. For those employers with 10 or fewer employees, the plan may be communicated orally to employees and the employer need not maintain a written plan.

If the Safety Manager has reason to believe an employee does not have the understanding required, the employee must be retrained. The Safety Manager certifies in writing that the employee has received and understands the fire prevention plan training.

Because failure to comply with company policy concerning fire prevention can result in OSHA citations and fines as well as employee injury, an employee who does not comply with this program will be disciplined.

The Safety Manager/supervisor provides training for each employee who is required to use fire prevention equipment. Employees shall not use fire prevention equipment without appropriate training. Training, before an individual is assigned responsibility to fight a fire, includes:

-Types of fires
-Types of fire prevention equipment
-Location of fire prevention equipment
-How to use fire prevention equipment
-Limitations of fire prevention equipment
-Proper care and maintenance of assigned fire prevention equipment and
-Employees must demonstrate an understanding of the training and the ability to use the equipment properly before they are allowed to perform work requiring the use of the equipment.

If the Safety Manager has reason to believe an employee does not have the understanding or skill required, the employee must be retrained. The Safety Manager certifies in writing that the employee has received and understands the fire prevention equipment training.

Emergency Action Plan

Purpose

Sierra Packaging and Converting, LLC is dedicated to the protection of its employees from emergencies such as tornadoes and fires. When emergencies do occur, our Emergency Action Plan (EAP) is initiated. This EAP is in place to ensure employee safety from emergencies during regular hours and after hours. It provides a written document detailing and organizing the actions and procedures to be followed by employees in case of a workplace emergency.

OSHA's Emergency Action Plan requirements, require Sierra Packaging and Converting, LLC to have a written emergency action plan (EAP). This EAP addresses emergencies that our company expects may reasonably occur at any of sites.

The EAP communicates to employees, policies and procedures to follow in emergencies. This written plan is available, upon request, to employees, their designated representatives, and any OSHA officials who ask to see it.

Administrative Duties

[Safety Manager Name], Safety Manager (or designee) is the EAP administrator, who has overall responsibility for the plan. This responsibility includes the following:

- Developing and maintaining a written Emergency Action Plan for regular and after hours work conditions;
  - Notifying the local fire or police departments, and the building owner/superintendent in the event of an emergency affecting the facility;
  - Taking security measures to protect employees;
  - Integrating the Emergency Action Plan with any existing general emergency plan covering the building or work area occupied;
  - Distributing procedures for reporting emergencies, the location of safe exits, and evacuation routes to each employee;
  - Conducting drills to acquaint employees with emergency procedures and to

judge the effectiveness of the plan;

- Training designated employees in emergency response such as the use of fire extinguishers and the application of first aid;
- Deciding which emergency response to initiate (evacuate or not);
- Ensuring that equipment is placed and locked in storage rooms or desks for protection;
- Maintaining records and property as necessary; and
- Ensuring that our facility meets all local fire codes, building codes, and regulations.

The Safety Manager is responsible for reviewing and updating the plan as necessary. Copies of this plan may be obtained from the Safety Manager's office.

The Safety Manager has full authority to decide to implement the EAP if he believes an emergency might threaten human health. The following potential emergencies might reasonably be expected at this facility or work areas and thus call for the implementation of this EAP:

- Fire emergencies (process area fires, non-pressurized tank fires, pressurized tank fires, fires at loading facilities, warehouse fires, office building fires, electrical fires)
- Toxic gas releases
- Flammable gas releases
- Hazardous liquid spills
- Oil spills
- Release of radiation
- Tornadoes
- Winter storms

- Flooding
- Bomb threat/Civil disturbance.
- First-aid emergencies

The Safety Manager can be contacted regarding further information about duties under this written Emergency Action Plan

Key management personnel home telephone numbers are kept in a safe place, on office and work area bulletin boards, and in company vehicles, for immediate use in the event of an emergency. These telephone numbers of key management personnel have been distributed all supervisors to be retained in their homes for use in communicating an emergency occurring during non-work hours:

If, after reading this plan, you find that improvements can be made, please contact the plan administrator, [Safety Manager Name]. We encourage all suggestions because we are committed to the success of our Emergency Action Plan. We strive for clear understanding, safe behavior, and involvement in the program from every level of the company.

Alarms

Different emergencies call for different alarms to indicate what actions employees should take. Sierra Packaging and Converting, LLC has established an employee alarm system that complies with 29 CFR 1910.165. We will use the tornado alarm to warn employees of tornado warnings only.

We have posted emergency telephone numbers near telephones, or emergency notice boards, and other conspicuous locations for use when telephones serve as a means of reporting emergencies:

Emergency Reporting and Weather Monitoring Procedures

In the Event of an Emergency Requiring Evacuation

When employees detect an emergency that requires an evacuation, such as a fire or hazardous release, they should Activate the fire alarm and exit the building to the

designated safe area for a headcount. The fire department will be notified via telephone.

In the Event of a Tornado Watch

We monitor tornadoes by severe weather radio. When available, our backup method for monitoring tornadoes includes city and county tornado sirens

Evacuation Procedures

Some emergencies require evacuation or escape procedures, while some require employees to stay indoors, or in a safe area. Our emergency escape procedures are designed to respond to many potential emergencies, depending on the degree of seriousness. Nothing in these procedures precludes the plan administrator's authority in determining whether employees should remain inside or evacuate.
At this company, the following types of emergency evacuations exist:

- total and immediate evacuation
- partial evacuation

Our emergency escape procedures and assignments are designed to respond to many potential emergencies that require them, including: fire, tornado, bomb threat, chemical release.

Employees need to know what to do if they are alerted to a specific emergency. After an alarm is sounded to evacuate, employees should take the following steps:

1. Cease work immediately and proceed to the nearest available exit.
2. Go to your designated safe area for a headcount and further instructions.

Procedures to Account for Employees

Trained evacuation personnel assist in safe and orderly evacuation for all types of emergencies that require evacuation. Once evacuation is complete, they conduct head counts. The employees selected are trained in the complete workplace layout and the various alternative escape routes from the workplace. All trained personnel are made aware of employees with disabilities who may need extra assistance, such as using the buddy system, and of hazardous areas to be avoided during emergencies. Before leaving, these employees check rooms and other enclosed spaces in the workplace for employees who may be trapped or otherwise unable to

evacuate the area.

Frontline supervisors must be aware of the locations of those employees working on a particular day when an emergency occurs, and be aware of who is absent or otherwise away from the premises. Accounting for employees will aid local responding fire/rescue departments in determining whether rescue efforts are necessary.

Once each evacuated group of employees have reached their evacuation destinations, each trained evacuation employee:

- Takes roll of his or her group,
- Makes sure all persons are accounted for,
- Reports in to a central checkpoint managed by [Safety Manager Name], Safety Manager, and
- Assumes role of department contact to answer questions.

Head count results should be given to the Fire Chief or firefighter, if requested.

No employees are to return to their work area until advised by [Safety Manager Name], Safety Manager or designee (after determination has been made that such re-entry is safe).

Fire

1. Upon sounding the alarm, all personnel shall evacuate the work area by the most direct route. The routes are shown on the work place maps posted on the bulletin boards.

2. Prior to exiting, turn off machine at your work station or close the valves on gas operated equipment such as oxygen/acetylene carts. Do not try to retrieve items or tools.

3. [Safety Manager Name], prior to exiting the area, shall ensure that all equipment is secured and all areas are checked to ensure that no employee remains in his area.

4. All employees shall go directly upon sounding the alarm to the parking lot and assemble with your Supervisor for a head count. At no time will you leave this area unless directed by management or supervision. Do not try to re-enter the work area to obtain personal items or tools. Supervisors will report to [Safety Manager Name] or his or representative with the names of all employees counted and any

unaccounted for personnel as soon as the head count is completed.

5. Any fire fighting, rescue or medical duties will be performed by the fire department, police department, or hospital medical personnel. At no time will our personnel attempt on their own initiative, a rescue or fire suppression, after departing the area. The only fire fighting attempted by our personnel will be in the incipient stage of the fire.

6. Should an employee discover a fire, he or she will notify the Supervisor in that area who will advise [Safety Manager Name] or his or her representative. At the same time the Supervisor will direct the use of fire extinguishers against the fire and evacuate when he or she deems it necessary.

[Safety Manager Name] will be responsible for furnishing any further information to the employees concerning this plan.

Tornado

1. Upon being advised of the distinct possibility that a tornado may strike the area [Safety Manager Name] or his representative shall sound the alarm, two short blasts from an air horn or vehicle horn. All personnel shall seek shelter immediately by either crawling under sturdy work benches, equipment, inside rooms or basements within the shop after shutting off power to machines.

2. Upon sounding the all clear signal which will be a voice signal and providing the tornado missed the shop, all personnel shall resume normal production duties.

3. If the tornado strikes the shop and the all clear is sounded by the U.S. Weather Bureau, it may be necessary to evacuate part of the work area.

4. Personnel in each building will be advised by voice communication by [Safety Manager Name] or his representative as to what action is necessary. If evacuation is deemed necessary those personnel to be evacuated will proceed directly to the parking lot. Do not try to retrieve personal items or tools. Head counting procedures will be the same as for fires. At no time will you leave this area unless directed by management or supervisory personnel.

5. All fire fighting, rescue and medical duties will be performed by fire department, police department, and hospital medical personnel. At no time will our personnel attempt on his own initiative a rescue after departing the work area.

6. [OTIS WILSON] will be responsible for furnishing any further information to the employees.

Earthquake

1. Upon realization that an earthquake is occurring get under the nearest workbench or equipment that will provide you overhead protection from falling objects. Try to stay away from electrical lines and overhead storage racks containing heavy objects.

2. Upon sounding the alarm, one blast from an air horn or vehicle horn, all personnel shall evacuate the area by the most direct exit. The routes are shown on the work place maps posted on bulletin boards. Prior to your exit turn off your machine at your work station and close the valves on gas operated equipment such as oxygen/acetylene welding carts. Do not try and retrieve personal items or tools.

3. [Safety Manager Name], prior to exiting the work area, shall ensure that all equipment is secured and all areas are checked to ensure that no employee remains on the work area.

4. All employees shall go directly upon sounding of the alarm to the parking lot and assemble with your Supervisor for a head count. At no time will you leave the area unless directed by management or supervisory personnel. Do not try to re-enter the work area to obtain personal items or tools. Supervisors report to [Safety Manager Name] or his or her representative the names of personnel counted and any unaccounted personnel as soon as the head count is completed.

5. Any rescue or medical duties will be performed by fire departments, police departments, or hospital medical personnel. At no time will our personnel attempt on their own initiative a rescue or fire suppression after departing the work area.

Terrorist Bomb Threat

Conduct Bomb Search

1. All supervisory personnel shall be advised by voice communication that a bomb threat has been received by the company at this work area.

2. All work activities shall cease in the suspected areas and a planned, organized

search for the suspected bomb will be conducted by all personnel. They are to be instructed to look for any item that normally would not be in this area. This could be a package, bundle, sack, box, or any object that might look suspicious.

Employees are to be instructed never to touch the object in any way, but to notify supervision who in turn advise fire and police personnel of the find.

3. At this time management must consider the possibility of a partial evacuation of the area. If this evacuation is deemed advisable then evacuation procedures outlined in the following paragraph shall be followed.

Evacuation

1. Upon sounding the alarm, personnel shall evacuate the area by the most direct exit.

   The routes are shown on the work place maps posed on bulletin boards.

2. Prior to exit, turn off your machine at the work station or close valves on gas operated equipment. Do not try to retrieve personal items, tools or vehicles. [Safety Manager Name], prior to exiting the work area, shall ensure that all equipment is secured and all areas are checked to ensure no employees remain on the work area. LEAVE THE LIGHTS ON TO ASSIST SEARCH PERSONNEL.

The employees shall go directly upon sounding of the alarm, to the parking lot and assemble with your Supervisor for a head count.

At no time will you leave this area unless directed by management or supervisory personnel. Do not try to re-enter the building or grounds to obtain personal items or tools or cars. Supervisors shall report to [Safety Manager Name] or his representative the names of all employees counted and any unaccounted for personnel as soon as head count is completed.

Hazardous Chemical Release

In the event of an accidental release of hazardous chemicals, an evacuation would be required if the release is in a significant amount to cause, or have potential to cause, harm to employees.

1. After it is determined that there is a hazardous chemical emergency, the

Management Team will be notified and make the decision whether to evacuate any areas. All unqualified Employees should remain clear of any spill or release of any hazardous material. If evacuation procedures have been initiated, ALL EMPLOYEES MUST LEAVE THE PLANT and proceed to the designated meeting area

NO ONE MAY ENTER THE RELEASE/SPILL/AFFECTED AREAS WITHOUT PROPER PERSONAL PROTECTIVE EQUIPMENT AND MANAGEMENT PERMISSION.

PPE is required at all times until the hazard has been dissipated with proof by proper testing procedures.

2. Maintenance Manager will proceed directly to the emergency area to determine if evacuation or outside help is necessary.

3. Management will activate the Emergency Response Team if required.

4. Management will implement the **Emergency Spill Procedures** of the **Spill Prevention Control & Countermeasures Plan** if any hazardous material is released.

Notification of State Department of Environmental Monitoring and EPA is required if spilled oil material discharges or threatens to discharge into a waterway of the State causing a visible sheen on or a discoloration of the surface water or shorelines, or if a reportable quantity for a hazardous substance is discharged or may unavoidably be discharged to a waterway of the State.

Medical Emergencies

All Medical Treatment provided by OHCP employed by Company shall follow the *Medical Directives and Nursing Procedures for Emergency Care*

1. After a medical emergency has been identified, the Assigned Manager, Occupational Health Care Professional or Senior Management Team Member and Area Supervisor should be notified immediately. The Area Supervisor has the responsibility to assure that the Assigned Manager, OHCP or Senior Management Team Member has been notified.

2. The severity of the medical emergency and level of action required will be

determined by the on-site OHCP.

3. All Medical Emergency Care Providers will use the proper PPEs as outlined in the *Control of Blood-borne Pathogens Program* and will follow the proper standards of care.

4. All injured or ill Employees requiring emergency medical care for life/death medical emergencies will be transported by local Emergency Medical Services (EMS) to the nearest local Hospital.

5. All non-life/death medical emergencies will be managed by the OHCP and Company Physician following proper standards of care.

6. All Employees who are involved in an injury or accident shall be screened for drugs and alcohol as prescribed by company policy.

7. During any emergency, the OHCP or Assigned Manager will have the responsibility to set-up the emergency medical care station at a location directed by the Senior Management Team Member depending on the emergency and relevant conditions.

Plan Administrator Duties

During an emergency, [Safety Manager Name], Safety Manager will do the following:

- Take all necessary measures to contain the hazard and prevent its spread to other nearby areas, with the assistance of emergency personnel.

- If the emergency is a hazardous material spill, ensure that the hazardous material and any material with which in came into contact (gravel, soil, etc.,), will be scraped up using shovels and/or brooms. All this combined material will be considered hazardous waste unless analysis shows otherwise.

- Provide for collection, treatment, and disposal of the waste and contaminated material by the emergency crew or outside contractor, as appropriate.

- Ensure that contaminated soil, liquids, or other material is placed in drums and handled as a hazardous waste.

- Ensure that the emergency crew restores all emergency equipment to full operational status.

- Assisted by other qualified persons, begin to investigate the cause of the emergency and take steps to prevent a recurrence of such or similar incidents.

- Ensure that the cause of the emergency has been eliminated and that cleanup and restoration have progressed at least to the point of not jeopardizing the health and safety of the employees, and that EPA, state, and local authorities have been notified, if required.

- Ensure that for spills or releases involving a hazardous substance at or above its reportable quantity, the following necessary information is recorded and reported: name of chemical(s) involved, whether the substance is listed under 40 CFR 302—extremely hazardous substances, estimated quantity of the released substance, time of the release and duration, medium into which the substance was released, health risks associated with the release, precautions taken to respond to the release, name and telephone numbers of persons who can be contacted for further information.

Training

Our Plan Administrator reviews with each of our employees at the following times, those parts of the Emergency Action Plan that employees must know to protect themselves in the event of an emergency:

- Initially when the plan is developed,
- Whenever an employee's responsibilities or designated actions under the plan change, and
- Whenever the plan is changed.

The information in this plan is not intended for casual reading, but is intended to get the appropriate message across.

Drills are conducted annually. After a drill, the Plan Administrator judges the effectiveness of the plan and reviews any employee input concerning the drill. Employees performing the drill may identify something that did not follow procedure or was ineffective. For example, they may discover doors that would not open; they may enter storage closets instead of exiting; they may get lost and confused. These are the types of things the Plan Administrator needs to hear about after a drill. That way, they can be addressed before a real emergency.

Emergency Action Diagram

Attached is a copy of the company Emergency Action Diagram showing the following:

- Exit Locations
- Fire Extinguisher Locations
- Storage Locations for Hazardous/Flammable Materials
- Storage Area for Spill Response Supplies and Personal Protective Equipment
- Tornado Shelters

A copy of this diagram is posted on company bulletin boards and near each exit.

First Aid Program

Purpose

Sierra Packaging and Converting, LLC is dedicated to the protection of its employees from on-the-job injuries and illnesses. However, when injuries or illnesses do occur, we are prepared to see that the needs of the injured or ill are met.

This written First Aid Program is intended to ensure that Sierra Packaging and Converting, LLC meets the requirements of 29 CFR 1910.151, Medical Services and First Aid.

Administrative Duties

[OTIS WILSON], Safety Manager, our First Aid Program Administrator, is responsible for establishing and implementing the written First Aid Program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written program may be obtained from Safety Manager in his office. If after reading this program, you find that improvements can be made, please contact [Safety Manager Name], Safety Manager. We encourage all suggestions because we are committed to the success of this written program.

Company Policy

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 are adequately trained to render first aid and adequate first aid supplies are readily available.

The Company provides a First Aid Kit on the premises. It is there for employee's use in the treatment of minor scratches, burns, headaches, nausea, etc. All employees shall know the location of the First Aid Kit and shall notify their supervisor if they need to use the First Aid Kit.

If an employee has a work related injury or illnesses that requires professional medical assistance, they shall notify their supervisor and let him/her know before they receive this assistance. If they fail to notify their supervisor, they may be ineligible for Worker's Compensation, benefits to pay for doctor's bills, and/or lost wages.

The Safety Manager shall inspect First Aid Kits before the kits are sent out to each job, and on a weekly basis to insure that they are filled and complete

In all cases requiring emergency medical treatment, immediately call, or have a co-worker call, to request emergency medical assistance.

Refer to the "Emergency Medical Treatment" section of this program for a list of Sierra Packaging and Converting, LLC personnel who are trained in CPR and First Aid.

Minor First Aid Treatment

First aid kits are stored in the main office building and in each company vehicle. If an employee sustains an injury or are involved in an accident requiring minor first aid treatment, they shall:

- Inform their supervisor.
- Administer first aid treatment to the injury or wound.
- If a first aid kit is used, indicate usage on the accident investigation report.
- Access to a first aid kit is not intended to be a substitute for medical attention.
- Provide details for the completion of the accident investigation report.

Non-Emergency Medical Treatment

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

- Inform your supervisor.
- Proceed to the posted medical facility. Your supervisor will assist with transportation, if necessary.
- Provide details for the completion of the accident investigation report.

Portable eye wash stations shall be used in the event an employee accidentally spills or splashes injurious chemicals or liquids on their clothing or body. Employees shall notify their supervisor if they use an eye wash station.

Emergency Medical Treatment

If an employee sustains a severe injury requiring emergency treatment:

- Call for help.
  Fixed line telephones and mobile or cellular phones are available to contact emergency medical service.

- 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 accident investigation report.

Sierra Packaging and Converting, LLC will ensure that individual will be properly trained in First Aid and CPR should a medical facility, infirmary or clinic not be in near proximity of 3 – 4 minutes.

First Aid Supplies and Equipment

It is important that our first aid supplies and equipment meet the specific needs of our worksite. [Safety Manager Name], Safety Manager has ensured that adequate first aid supplies are readily available, including:

- Variety of bandages, compresses, and gauze pads
- Antiseptic swabs
- Burn treatments
- Adhesive tape
- Latex or similar gloves

- Eye dressing
- Eyewash solution
- Instant cold packs
- Antibiotic cream
- Ammonia inhalants

The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item. They are located in the main office building and each company vehicle.

[Safety Manager Name], Safety Manager checks the first aid supplies. The contents of the first-aid kit shall be checked by the employer before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced. Supplies are replaced promptly when expended.

Program Evaluation

By having [Safety Manager Name], Safety Manager thoroughly evaluate and, as necessary, revise our program, we ensure our program's effectiveness and prevent or eliminate any problems. Program evaluation is performed annually.

Blood borne Pathogen Program

Policy Statement

It is the policy of Sierra Packaging and Converting, LLC to provide a safe and healthful workplace for our employees. This policy and procedure will provide a method to safe guard our employees from being occupationally exposed to blood and other potentially infectious materials (OPIM), during first-aid and emergency situations. It is also the intent of this policy to comply with federal OSHA requirements listed in 29 CFI 1910.1030.

Scope

This policy applies to individuals, who in an emergency situation, have the potential for being exposed to blood and other potentially infectious materials when responding solely to injuries resulting from workplace incidents. This policy also applies to janitorial

Accident Reporting and Investigation Plan

Purpose

This is Sierra Packaging and Converting, LLC's Accident Reporting and Investigation Plan prescribes methods and practices for reporting and investigating accidents. No matter how conscientious the safety effort at a company, accidents happen occasionally due to human or system error. Therefore, this written plan is intended to provide a means to deal with all workplace accidents in a standardized way and demonstrate our company's compliance with the reporting requirements of 29 CFR 1904. In addition, it is the policy of the company to comply with all workers' compensation laws and regulations.

Administrative Duties

Otis Wilson, Safety Manager is responsible for developing and maintaining this written Accident Reporting and Investigation Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. Appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our Accident Reporting and Investigation Plan and conduct investigations, also qualify David Hodges.

This written Accident Reporting and Investigation Plan is kept at the following location: Plant Manager's office.

Accident Reporting Procedures

Our accident reporting procedures include the following:

1. Employees injured on the job are to report the injury to their supervisor immediately (if possible) or as soon as possible after an incident/accident. "Near miss" accidents or incident should be reported as well, i.e., when an employee nearly has an accident but is able to avoid an injury or illness.

2. The supervisor is then to immediately notify Otis Wilson, Plant Manager; complete the company Accident Report Form (see the Appendices for a sample form) with the employee, any witnesses, and/or other relevant people; and send a copy of the written Accident Report Form to the Safety Manager as soon as possible after the accident.

3. Any employee witnessing an accident at work is to call for emergency help or whatever assistance appears to be necessary. In addition, the employee is immediately to report the accident to the area supervisor and take part in answering questions related to the Accident Report Form and Accident Investigation Form.

   A sample Accident Report Form is provided in the appendices.

Accident Investigation Procedures

Thorough accident investigations will help the company determine why accidents occur, where they happen, and any trends that might be developing. Such identification is critical to preventing and controlling hazards and potential accidents. For all accident investigations, Safety Manager, Safety Team and Employee Supervisor will perform the following duties:

1. Conducts the accident investigation at the scene of the injury as soon after the injury as safely possible.

2. Asks the employee involved in the accident and any witnesses, in separate interviews, to tell him/her in their own words exactly what happened. He/She does not interrupt or ask for more details at that time; he/she just lets the employee describe it in his/her own style.

3. Repeats the employee's version of the event back to the employee or witness and allows him/her to make any corrections or additions.

4. After the employee or witness has given his/her description of the event, asks appropriate questions that focus on causes.

5. Reminds the employee that the investigation was to determine the cause and possible corrective action that can eliminate the cause(s) of the accident.

6. Completes section "A" of the attached Accident Investigation Form with the employee, and reviews the data with the employee for accuracy.

7. Uses the Accident Investigation Form for:

   - Tracking and reporting injuries on a monthly basis;
   - Grouping injuries by type, cause, body part affected, time of day, and process involved;
   - Determining if any trends in injury occurrence exist and graphing those trends if possible;
   - Identifying any equipment, materials, or environmental factors that seem to be commonly involved in injury incidents;
   - Discussing with the safety team and superiors the possible solutions to the problems identified; and
   - Proceeding with improvements to reduce the likelihood of future injuries.

   A sample Accident Investigation Form is provided in the appendices.

Injury, Illness and Medical Issues

We also follow these procedures:

1. If a workplace accident results in an injury or illness requiring hospitalization of three or more employees or a fatality of one or more employee, David Hodges, Safety Manager reports the incident within eight hours by phone or in person to the nearest OSHA office.

2. If an injured person is taken to a doctor, David Hodges attaches the doctor's statement to the Accident Report Form.

3. If the injury or illness is "recordable" according to OSHA regulation, 29 CFR 1904, then the Safety Manager enters each recordable injury or illness on the OSHA 300 Log, OSHA 301 Incident Report, and a separate, confidential list of privacy-concern cases, if any, within 7 calendar days of receiving information that a recordable injury or illness has occurred.

4. Employees with workplace injuries resulting in time off work shall be put in the company's Return-to-Work Program to facilitate their full recovery and resumption

of original work.

5. Weekly compensation for workplace injuries or illnesses requiring time off work, as indicated by law, applies after the third day of wage loss.

6. On the day of the injury, the company will cover the time loss due to doctor and/or emergency room visits or inability to work, up to a maximum of four hours.

7. Any time an associate is away from work because of an accident on-the-job, it should be recorded on the time sheet under Accident On Duty.

Recordkeeping

Otis Wilson, Plant Manager is responsible for maintaining the following records and documentation:

- Accident Report Forms.

- Accident Investigation Forms.

- OSHA 200 Form, Log of Occupational Injuries and Illnesses. Prior to and including the year 2001, injuries and illnesses at the company are recorded on this form no later than six working days after receiving information that a recordable injury or illness has occurred.

- OSHA 101 Form, Supplemental Record of Occupational Injuries and Illnesses. Prior to and including the year 2001, this form is completed at each establishment within six working days after receiving information that a recordable case has occurred. The form is available for inspection.

- OSHA 102 Form, Summary of Occupational Injuries and Illnesses. Prior to and including the year 2001, injuries and illnesses at the company are recorded on this form no later than six working days after receiving information that a recordable injury or illness has occurred. This form is posted no later than February 1 following the year covered by the form, and shall remain in place until March 1.

- OSHA 300 Form, Log of Work-Related Injuries and Illnesses. Starting January 1, 2002, injuries and illnesses at the company are recorded on this form within seven calendar days of receiving information that a recordable injury or illness has occurred.

- OSHA 301 Form, Injury and Illness Incident Report. Starting January 1, 2001, injuries and illnesses at the company are recorded on this form within seven calendar days of receiving information that a recordable injury or illness has occurred.

- OSHA 300-A Form, Summary of Work-Related Injuries and Illnesses. This form is completed by the end of the year, posted no later than February 1 of the year following the year covered by the form (the first one must be posted in the year 2003), and kept posted in place until April 30.

- Training records.

- Other forms including equivalent injury and illness recording forms.

Annual Summary Posting

At the end of each calendar year, [Safety Manager Name], Safety Manager performs the following steps:

1. Reviews the OSHA 300 Form to verify that the entries are complete and accurate,

2. Corrects any deficiencies identified in the entries,

3. Creates OSHA 300-A, an annual summary of injuries and illnesses recorded on the OSHA 300 Form,

4. Ensures that a company executive certifies that he/she reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and

5. Posts OSHA 300-A on the office bulletin board from February 1 through April 30 of the year following the year covered by the form.

   Note: The 2001 summary (summary portion of OSHA 200 Log) must only be posted from February 1 to March 1, 2002.

Employee Involvement and Training

This plan is an internal document guiding the action and behaviors of employees, so they need to know about it. At the time of their hire David Hodges, Safety Manager thoroughly explains to all employees why the Accident Reporting and Investigation Plan was prepared and how employees may be affected by it. Employees are informed in how to report an injury or illness.

Employees, and their representatives, are also provided limited access to our injury and illness records. Copies of relevant OSHA 300 Log are provided by the next business day to all employees, former employees, and representatives that request them. Employees, former employees, and personal representatives who request OSHA 301 Injury & Illness Incident Report will also receive them by the end of the next business day. However, authorized employee representatives will only receive requested OSHA 301 Injury & Illness Incident Report within seven calendar days, and all sections of the OSHA 301 Injury & Illness Incident Report will be removed except the 'Tell us about the case.' section. All initial copies are provided to requestors free of charge. Additional copies involve a reasonable charge.

Our company does not discriminate against employees for:

- Reporting a work-related fatality, injury, or illness;
- Filing a safety and health complaint;
- Asking for access to occupational injury and illness records; or
- Exercising any rights afforded by the Occupational Safety and Health Act.

Program Evaluation

The Accident Reporting and Investigation Plan is evaluated and updated by [Safety Manager Name], Safety Manager annually to determine whether the plan is being followed and if further training may be necessary.

Appendices

We have attached the following appendices to ensure better understanding of this plan:

- Accident report forms;
- Employee Report of Accident, Injury or Illness
- Supervisor's Report of Accident
- Safety Committee Accident Investigation Report

Sierra Packaging and Converting, LLC

Employee Report of Accident, Injury or Illness

Instructions: Please Print. Fill in all blanks. If a blank does not pertain to your accident, injury or illness write "N/A" in that blank. When completed, return this form to your supervisor.

Name: _____

Social Security Number: _____ Sex ___Age _____

Address_____ Phone Number _____

Marital Status ❑Single ❑Married ❑Separated ❑Divorced ❑Widowed
#of Dependents_____

Employment Start Date	Time in Present Job
Job Title	Supervisor's Name
Department	Date & Time of Accident
Location of Accident	Task being Performed
Name of Witness	Name of Witness
Describe how the accident happened	
What caused the Accident	
What could have prevented this accident	
Date & Time you first sought medical attention	
Name of Hospital or Doctor	
Were you using required safety equipment?	
Do you have a job at another company?	

The information I have provided either in my own writing or verbally for the purpose of this form is true and correct. I understand that providing false or misleading information or omission of information on this report or any other form relating to this claim of injury/accident may result in termination of my employment.

Signature of Employee: _____ **Date:** _____

Signature of Witness: _____

Supervisor's Report of Accident

Supervisor's Name: _____

Basic Rules for Accident Investigation

- Find the cause to prevent future accidents - Use an unbiased approach during investigation
- Interview witnesses & injured employees at the scene - conduct a walkthrough of the accident
- Conduct interviews in private - Interview one witness at a time.
- Get signed statements from all involved.
- Take photos or make a sketch of the accident scene.
- What hazards are present - what unsafe acts contributed to accident
- Ensure hazardous conditions are corrected immediately.

Incident Report Review

Supervisor _____ Date _____

Safety Manager _____ Date _____

Plant Manager _____ Date _____

Management Comments:

Date & Time		Location	
Tasks performed		Witnesses	
Resulted in	__ Injury __ Fatality __Property Damage	Property Damage	
Injured		Injured	
Describe Accident Facts & Events			

Supervisor's Incident Cause Analysis
Check ALL that apply to this accident

Unsafe Acts		Unsafe Conditions	
Improper work technique		Poor Workstation design	
Safety rule violation		Unsafe Operation Method	
Improper PPE or PPE not used		Improper Maintenance	
Operating without authority		Lack of direct supervision	
Failure to warn or secure		Insufficient Training	
Operating at improper speeds		Lack of experience	
By-passing safety devices		Insufficient knowledge of job	
Protective equipment not in use		Slippery conditions	
Improper loading or placement		Excessive noise	
Improper lifting		Inadequate guarding of hazards	
Servicing machinery in motion		Defective tools/equipment	
Horseplay		Poor housekeeping	
Drug or alcohol use		Insufficient lighting	

Unsafe Acts require a written warning and re-training <u>before</u> the Employee resumes work

	Date		Date
Re-Training Assigned		Unsafe Condition Guarded	
Re-Training Completed		Unsafe Condition Corrected	
Supervisor Signature		Supervisor Signature	

Sierra Packaging and Converting, LLC

Safety Committee Accident Investigation Report

Name	Age	Time	Date
Department – Shift	Job	How long on this job?	
What Happened?			
Why Did It Happen?			
What Should Be Done?			
What Has Been Done Thus Far?			
How Will This Improve Operations?			

Investigated By		Date	
Safety Manager Signature		Date	

NOTE: Number of injuries for this employee in the last 12 months: _____

Safety Committee & Accident Investigations

Purpose

Accident prevention and control of hazards is the result of a well-designed and executed safety and health program. One of the keys to a successful program includes company safety committees composed of management and general labor personnel. Two of the most critical functions of a well-designed, trained safety committee are safety audits and accident investigations. The basic purpose of audits and investigations is to determine measures that can be taken to prevent accidents in the future. Sierra Packaging and Converting, LLC is committed to accident prevention in the workplace.

Policy

A company safety committee has been established composed of the personnel listed below. When possible, new employees will be rotated on to the committee to provide new enthusiasm and perspectives on safety in the workplace.

The safety committee has four primary responsibilities and they are as follows:

1. Assisting in the enforcement of company safety policies.
2. Investigating employee safety complaints.
3. Conducting periodic safety audits of their assigned area(s).
4. Conducting prompt, unbiased, and accurate accident investigations.

The safety committee meets on a monthly basis to discuss current safety issues and to conduct a safety audit of the job site(s). These activities will be documented using the attached Minutes of Safety Committee Meeting Form.

Safety Inspections & Audits

Inspection of job sites and audits of safety programs are tools that can be used to identify problems and hazards before these conditions result in accidents or injuries. Audits also help to identify the effectiveness of safety program management and can be used as a guide to assure regulatory compliance and a safe workplace.

Types of Inspections

- **Supervisor & Management Daily Walk-through:** this is an undocumented inspection that is made daily prior to startup and shift change to ensure the job site and equipment is in safe conditions for Employees. All noted unsafe areas are placed in a safe condition prior to Employees working in the area.

- **Monthly Safety Committee Inspection:** each month members of the Safety Committee will tour the job site(s) with the Safety Manager. This tour is to ensure Safety Committee Members are familiar with all areas of the operation. Record of problem areas, committee recommendations and deficiencies will be recorded and provided to management.

- **Equipment Inspections:** are conducted on a routine basis to ensure specific safety equipment is in good working order and will function when needed.

- **Program Audits**: are conducted to check the administration of specific safety and health programs. Program Audits shall be conducted annually.

  As a minimum, the last two program audits will be kept on record. Routine inspection records will be maintained on a most current basis. Records of deficiency corrections will be maintained for one calendar year from date of correction.

Accident Investigations

It is the policy of Sierra Packaging and Converting, LLC that all work related accidents, injuries and illnesses are to be conducted in a professional manner to identify probable causes and are used to develop specific management actions for the prevention of future accidents. Every minor or non-disabling injury will be investigated with the same vigor and thoroughness as serious injuries. Proper and complete investigation of these injuries can be an effective injury prevention tool. The Safety Committee will be responsible for conducting accident investigations.

All accident investigations will be conducted as soon as possible, within 48 hours. All accident investigations will be documented using the attached Accident Investigation Report Form. While conducting accident investigations, particular attention will be given to suggesting ways to prevent future occurrences of the events which caused the accident and corrective action to be taken.

Sierra Packaging and
Converting, LLC

Minutes of Safety Committee Meeting

Department: _____ Date: _____

Location: _____ Date Previous Meeting: _____

Attendance (also list absentees who should have attended meeting):

Minutes By: _____ Date of Next Meeting: _____

Minutes should serve as a record of important discussions on accidents and inspections, and action taken or suggested to correct accident producing conditions. List under the following headings:

1. Previous suggestions not acted upon (list and indicate why not, what to do now).

2. Accidents since last report (list & indicate corrective action necessary).

3. Other items discussed (based on inspections, suggestions, etc.)

4. Summary of new suggestions (indicate what is to be done & who is responsible).

5. Future plans (list items to be studied, reports to be made at next meeting, date, etc.).

Sierra Packaging and Converting, LLC

Safety Committee Accident Investigation Report

Name	Age	Time	Date
Department – Shift	Job	How long on this job?	
What Happened?			
Why Did It Happen?			
What Should Be Done?			
What Has Been Done Thus Far?			
How Will This Improve Operations?			

Investigated By		Date	
Safety Manager Signature		Date	

NOTE: Number of injuries for this employee in the last 12 months: _____

Hazard Communication Program

This Hazard Communication Program has been developed in accordance with the Occupational Safety and Health Administration (OSHA) regulations 29 CFR 1910.1200. It provides detailed safety guidelines and instructions for receipt, use and storage of chemicals at our facility by employees and contractors.

Administrative Duties

[Safety Manager Name], Safety Manager has overall responsibility for coordinating safety and health programs in this company. He/she is the person having overall responsibility for the Hazard Communication Program. [Safety Manager Name] will review and update the program, as necessary. Copies of the written program may be obtained in the Safety Manager's office.

General Program Information

This written Hazard Communication Plan (HAZCOM) has been developed based on OSHA's Hazard Communication Standard and consists of the following elements:

- Identification of Hazardous Materials
- Product Warning Labels
- Material Safety Data Sheets (MSDS)
- Written Hazard Communication Program
- Effective Employee Training

Some chemicals are explosive, corrosive, flammable, or toxic. Other chemicals are relatively safe to use and store but may become dangerous when they interact with other substances. To avoid injury and/or property damage, persons who handle chemicals in any area of the Company must understand the hazardous properties of the chemicals. Before using a specific chemical, safe handling methods and health hazards must always be reviewed. Supervisors are responsible for ensuring that the equipment needed to work safely with chemicals is accessible and maintained for all employees on all shifts.

Employee Training

Initial Orientation Training

All new employees shall receive safety orientation training covering the elements of the HAZCOM and Right to Know Program. This training will consist of general training covering:

1. Location and availability of the written Hazard Communication Program
2. Location and availability of the List of Chemicals used in the workplace
3. Methods and observation used to detect the presence or release of a hazardous chemical in the workplace.
4. The specific physical and health hazard of all chemicals in the workplace
5. Specific control measures for protection from physical or health hazards
6. Explanation of the chemical labeling system
7. Location and use of MSDS

Job Specific Training

Employees will receive on the job training from their supervisor. This training will cover the proper use, inspection and storage of necessary personal protective equipment and chemical safety training for the specific chemicals they will be using or will be working around.

Annual Refresher Training

Annual Hazard Communication refresher training will be conducted as part of the company's continuing safety training program.

Immediate On-the-Spot Training

This training will be conducted by supervisors for any employee that requests additional information or exhibits a lack of understanding of the safety requirements.

Non-Routine Tasks

Non-routine tasks are defined as working on, near, or with unlabeled piping, unlabeled containers of an unknown substance, confined space entry where a hazardous substance

may be present and/or a one-time task using a hazardous substance differently than intended (example: using a solvent to remove stains from tile floors).

Steps for Non-Routine Tasks

Step 1: Hazard Determination
Step 2: Determine Precautions
Step 3: Specific Training & Documentation
Step 4: Perform Task

All non-routine tasks will be evaluated by the Area Supervisor and Safety Manager before the task commences, to determine all hazards present. This determination will be conducted with quantitative/qualitative analysis (air sampling, substance identification/analysis, etc., as applicable).

Once the hazard determination is made, the Department Supervisor and Safety Department will determine the necessary precautions needed to either remove the hazard, change to a non-hazard, or protect from the hazard (use of personal protective equipment) to safeguard the Employees present. In addition, the Department Supervisor or Safety Department will provide specific safety training for Employees present or affected and will document the training.

Off-Site Use or Transportation of Chemicals

An MSDS will be provided to employees for each chemical and each occurrence of use or transport away from the company facilities. All State and Federal DOT Regulations will be followed including use of certified containers, labeling & marking, securing of containers and employee training.

General Chemical Safety

Assume All Chemicals Are Hazardous

> The number of hazardous chemicals and the number of reactions between them is so large that prior knowledge of all potential hazards cannot be assumed. Use chemicals in as small quantities as possible to minimize exposure and reduce possible harmful effects.

General Safety Rules

- Read and understand the Material Safety Data Sheets.
- Keep the work area clean and orderly.
- Use the necessary safety equipment.
- Carefully label every container with the identity of its contents and appropriate hazard warnings.
- Store incompatible chemicals in separate areas.
- Substitute less toxic materials whenever possible.
- Limit the volume of volatile or flammable material to the minimum needed for short operation periods.
- Provide means of containing the material if equipment or containers should break or spill their contents.

Task Evaluation

Each task that requires the use of chemicals should be evaluated to determine the potential hazards associated with the work. This hazard evaluation must include the chemical or combination of chemicals that will be used in the work, as well as other materials that will be used near the work. If a malfunction during the operation has the potential to cause serious injury or property damage, a Safe Operational Procedure (SOP) should be prepared and followed. Operations must be planned to minimize the generation of hazardous wastes.

Chemical Storage

The separation of chemicals (solids or liquids) during storage is necessary to reduce the possibility of unwanted chemical reactions caused by accidental mixing. Explosives should be stored separately outdoors. Use either distance or barriers (e.g., trays) to isolate chemicals into the following groups:

- Flammable Liquids: store in approved flammable storage lockers.
- Acids: treat as flammable liquids
- Bases: do not store bases with acids or any other material
- Other liquids: ensure other liquids are not incompatible with any other chemical in the same storage location.
- Lips, strips, or bars are to be installed across the width of storage shelves to restrain the chemicals in case of earthquake.

Chemicals will not be stored in the same refrigerator used for food storage. Refrigerators used for storing chemicals must be appropriately identified by a label on the door.

Container Labels

It is extremely important that all containers of chemicals are properly labeled. This includes every type of container from a 5000-gallon storage tank to a spray bottle of degreaser. The following requirements apply:

- All containers will have the appropriate label, tag or marking prominently displayed that indicates the identity, safety and health hazards.

- Portable containers which contain a small amount of chemical need not be labeled if they are used immediately that shift, but must be under the strict control of the employee using the product.

- All warning labels, tags, etc., must be maintained in a legible condition and not be defaced. Facility weekly supervisor inspections will check for compliance of this rule.

Incoming chemicals are to be checked for proper labeling.

Emergencies and Spills

In case of an emergency, implement the proper Emergency Action & Response Plan.

1. Evacuate people from the area.
2. Isolate the area.
3. If the material is flammable, turn off ignition and heat sources.
4. Only personnel specifically trained in emergency response are permitted to participate in chemical emergency procedures beyond those required to evacuate the area.
5. Call for Emergency Response Team assistance if required.

Housekeeping

Maintain the smallest possible inventory of chemicals to meet immediate needs. Periodically review stock of chemicals on hand.

Ensure that storage areas, or equipment containing large quantities of chemicals, are secure from accidental spills.

Rinse emptied bottles that contain acids or inflammable solvents before disposal.
Recycle unused laboratory chemicals wherever possible.

DO NOT Place hazardous chemicals in salvage or garbage receptacles.
DO NOT Pour chemicals onto the ground.
DO NOT Dispose of chemicals through the storm drain system.
DO NOT Dispose of highly toxic, malodorous chemicals down sinks or sewer drains.

Contractors

All outside contractors working inside Company Facilities are required to follow the requirements of this program. The Company will provide Contractors information concerning:

- Location of MSDS
- Precautions to be taken to protect contractor employees
- Potential exposure to hazardous substances
- Chemicals used in or stored in areas where they will be working
- Location and availability of Material Safety Data Sheets
- Recommended Personal Protective Equipment
- Labeling system for chemicals

Definitions

Chemical: any element, chemical compound or mixture of elements and/or compounds.

Combustible liquid: means any liquid having a flash point at or above 100 deg. F (37.8 deg. C), but below 200 deg. F (93.3 deg. C), except any mixture having components with flash points of 200 deg. F (93.3 deg. C), or higher, the total volume of which make up 99 percent or more of the total volume of the mixture.

Compressed gas: any compound that exhibits:
A gas or mixture of gases having, in a container, an absolute pressure exceeding 40 psi at 70 deg. F
A gas or mixture of gases having, in a container, an absolute pressure exceeding 104 psi at 130 deg. F. regardless of the pressure at 70 deg. F.
A liquid having a vapor pressure exceeding 40 psi at 100 deg. F.

Container: any bag, barrel, bottle, box, can, cylinder, drum, reaction vessel, storage tank, or the like that contains a hazardous chemical. For purposes of this section, pipes or piping systems, and engines, fuel tanks, or other operating systems in a vehicle, are not considered to be containers.

Employee: a worker who may be exposed to hazardous chemicals under normal operating conditions or in foreseeable emergencies. Workers such as office workers or bank tellers who encounter hazardous chemicals only in non-routine, isolated instances are not covered.

Employer: a person engaged in a business where chemicals are either used, distributed, or are produced for use or distribution, including a contractor or subcontractor.

Explosive: a chemical that causes a sudden, almost instantaneous release of pressure, gas, and heat when subjected to sudden shock, pressure, or high temperature.

Exposure or exposed: 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. Subjected in terms of health hazards includes any route of entry (e.g. inhalation, ingestion, skin contact or absorption.)

Flammable: a chemical that falls into one of the following categories:
"Aerosol, flammable" means an aerosol that yields a flame projection exceeding 18 inches at full valve opening, or a flashback (a flame extending back to the valve) at any degree of valve opening;

> "Gas, flammable" means a gas that, at ambient temperature and pressure, forms a flammable mixture with air at a concentration of thirteen (13) percent by volume or less; or
>
> A gas that, at ambient temperature and pressure, forms a range of flammable mixtures with air wider than twelve (12) percent by volume, regardless of the lower limit;
>
> "Liquid, flammable" means any liquid having a flash point below 100 deg. F., except any mixture having components with flash points of 100 deg. F. or higher, the total of which make up 99 percent or more of the total volume of the mixture.

"Solid, flammable" means a solid, other than a blasting agent or explosive as defined in 1910.109(a), that is liable to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or which can be ignited readily and when ignited burns so vigorously and persistently as to create a serious hazard. A chemical shall be considered to be a flammable solid if it ignites and burns with a self-sustained flame at a rate greater than one-tenth of an inch per second along its major axis.

Flash point: the minimum temperature at which a liquid gives off a vapor in sufficient concentration to ignite.

Hazardous chemical: any chemical which is a physical hazard or a health hazard.

Hazard warning: any words, pictures, symbols, or combination appearing on a label or other appropriate form of warning which convey the specific physical and health hazard(s), including target organ effects, of the chemical(s) in the container(s). (See the definitions for "physical hazard" and "health hazard" to determine the hazards which must be covered.)

Health hazard: a chemical for which there is evidence that acute or chronic health effects may occur in exposed employees. The term "health hazard" includes chemicals which are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membranes.

Identity: any chemical or common name which is indicated on the material safety data sheet (MSDS) for the chemical. The identity used shall permit cross-references to be made among the required list of hazardous chemicals, the label and the MSDS.

Immediate use: the hazardous chemical will be under the control of and used only by the person who transfers it from a labeled container and only within the work shift in which it is transferred.

Label: any written, printed, or graphic material displayed on or affixed to containers of hazardous chemicals.

Material safety data sheet (MSDS): written or printed material concerning a hazardous chemical which is prepared in accordance with OSHA Standard 1910.1200 requirements.

Mixture: any combination of two or more chemicals if the combination is not, in whole or in part, the result of a chemical reaction.

Oxidizer: means a chemical other than a blasting agent or explosive as defined in 1910.109(a), that initiates or promotes combustion in other materials, thereby causing fire either of itself or through the release of oxygen or other gases.

Physical hazard: a chemical that it is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, an oxidizer, pyrophoric, unstable (reactive) or water-reactive.

Pyrophoric: a chemical that will ignite spontaneously in air at a temperature of 130 deg. F. or below.

Specific chemical identity: the chemical name, Chemical Abstracts Service (CAS) Registry Number, or any other information that reveals the precise chemical designation of the substance.

Unstable (reactive): a chemical which in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shocks, pressure or temperature.

Use: to package, handle, react, emit, extract, generate as a byproduct, or transfer.

Water-reactive: a chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

Work area: a room or defined space in a workplace where hazardous chemicals are produced or used, and where employees are present.

Workplace: an establishment, job site, or project, at one geographical location containing one or more work areas.

MSDS Information

Material Safety Data Sheets are provided by the chemical manufacturer to provide additional information concerning safe use of the product. Each MSDS provides:

- Common Name and Chemical Name of the material
- Name, address and phone number of the manufacturer
- Emergency phone numbers for immediate hazard information
- Date the MSDS was last updated
- Listing of hazardous ingredients
- Chemical hazards of the material
- Information for identification of chemical and physical properties

Information Chemical Users must know

Fire and/or Explosion Information

- Material Flash Point, auto-ignition temperature and upper/lower flammability limits
- Proper fire extinguishing agents to be used
- Fire fighting techniques
- Any unusual fire or explosive hazards

Chemical Reaction Information

- Stability of Chemical
- Conditions and other materials which can cause reactions with the chemical
- Dangerous substances that can be produced when the chemical reacts

Control Measures

- Engineering Controls required for safe product use
- Personal protective equipment required for use of product
- Safe storage requirements and guidelines
- Safe handling procedures

Health Hazards

- Permissible Exposure Limit (PEL) and Threshold Limit Value (TLV)
- Acute or Chronic symptoms of exposure
- Main routes of entry into the body
- Medical conditions that can be made worse by exposure
- Cancer causing properties if any
- Emergency and First Aid treatments

Spill & Leak Procedures

- Clean up techniques
- Personal Protective Equipment to be used during cleanup
- Disposal of waste & cleanup material

Employee Use of MSDS

For MSDS use to be effective, employees must:

- Know the location of the MSDS
- Understand the major points for each chemical
- Check MSDS when more information is needed or questions arise
- Be able to quickly locate the emergency information on the MSDS
- Follow the safety practices provided on the MSDS

Responsibilities

Management

- Ensure compliance with this program
- Conduct immediate corrective action for deficiencies found in the program
- Maintain an effective Hazard Communication training program
- Make this plan available to employees or their designated representative
- Shipping & Receiving Manager
- Ensure all received containers are properly labeled and that labels are not removed or defaced
- Ensure all shipped containers are properly labeled
- Ensure shipping department employees are properly trained in spill response
- Ensure received Material Safety Data Sheets (MSDS) are properly distributed

Safety Manager

- Maintain a list of hazardous chemicals using the identity that is referenced on the MSDS
- Monitor the effectiveness of the program
- Conduct annual audit of the program
- Monitor employee training to ensure effectiveness
- Keep management informed of necessary changes
- Ensure MSDSs are available as required
- Monitor facility for proper use, storage and labeling of chemicals
- Ensure MSDS are available for emergency medical personnel when treating exposed employees
- Provide information, as requested, concerning health effects and exposure symptoms listed on MSDSs

Supervisors

- Comply with all specific requirements of the program
- Provide specific chemical safety training for assigned employees
- Ensure chemicals are properly used stored & labeled
- Ensure only the minimum amount necessary is kept at work stations
- Ensure up to date MSDS are readily accessible to all employees on all shifts

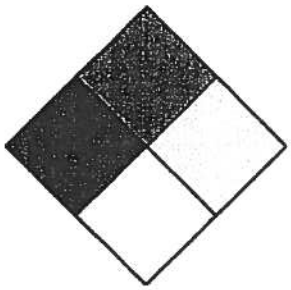
Employees

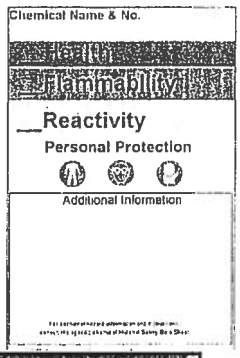
- Comply with chemical safety requirements of this program
- Report any problems with storage or use of chemicals
- Immediately report spills of suspected spills of chemicals
- Use only those chemicals for which they have been trained
- Use chemicals only for specific assigned tasks in the proper manner

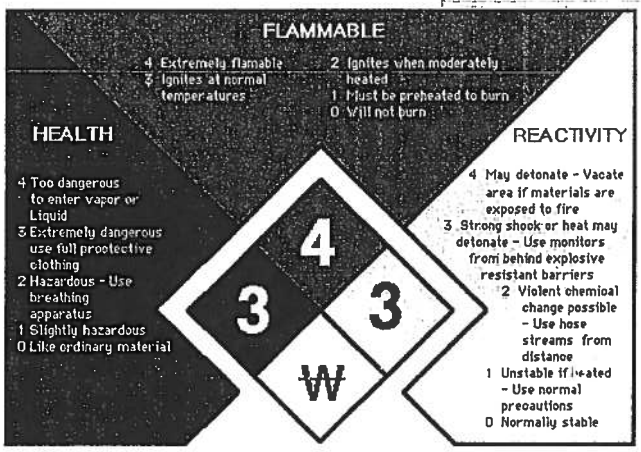
Contractors

- Comply will all aspects of this program
- Coordinate information with the Safety Manager
- Ensure Contractor employees are properly trained
- Notify the Safety Manager before bringing any chemicals into company property or facilities
- Monitor and ensure proper storage and use of chemicals by Contractor employees.

Uniform Labeling Systems







Lockout Tagout – Control of Hazardous Energy Program

Purpose

The following procedure is provided for use in both lockout and tagout programs. This procedure may be used when there are limited number or types of machines or there is a single power source. For more complex systems, a more comprehensive procedure will need to be developed, documented, and utilized.

Lockout is the preferred method of isolating machines or equipment from energy sources. This procedure establishes the minimum requirements for the lockout of energy isolating devices whenever maintenance or servicing is done on machines or equipment. It shall be used to ensure that the machine or equipment is stopped, isolated from all potentially hazardous energy sources, and locked out before employees perform any servicing or maintenance where the unexpected energization or start-up of the machine or equipment or release of stored energy could cause injury such as minor to serious shock, burns (chemical or thermal), cuts, or abrasions.

Administrative Duties

[Safety Manager Name] has overall responsibility for coordinating safety and health programs in this company. He is the person having overall responsibility for the Lockout/Tagout Program. [Safety Manager Name] will review and update the program, as necessary. Copies of the written program may be obtained in the Safety Manager's office.

All employees are required to comply with the restrictions and limitations imposed upon them during the use of lockout. The authorized employees are required to perform the lockout in accordance with this procedure. Servicing is to be done only by trained, authorized employees. Each new or transferred affected employee and other employees whose work operations are or may be in the area shall be instructed in the purpose and use of the lockout or tagout procedures. All employees, upon observing a machine or piece of equipment which is locked out to perform servicing or maintenance, shall not attempt to start, energize, or use the machine or equipment.

Contractors are required to utilize this company's procedure except when the contractor can demonstrate that their current lockout procedure affords the same level of safety as Sierra Packaging and Converting, LLC' procedure.

Affected and Authorized Employees

Affected Employee

An employee whose job requires him/her to operate or use a machine or equipment on which servicing or maintenance is being performed under lockout or tagout, or whose job requires him/her to work in an area in which such servicing or maintenance is being performed.

Authorized Employee

A person who locks out or tags out machines or equipment in order to perform servicing or maintenance on that machine or equipment. An affected employee becomes an authorized employee when that employee's duties include performing servicing or maintenance covered under this section.

Machinery and Equipment

Lockout is the preferred method of isolating machines or equipment from energy sources. Tagout is to be performed instead of lockout only when there is no way to lockout a machine.

Sequence of Lockout System Procedure

1. Lockout locks cannot be used for any purpose other than lockout, and must meet the following provisions.
   a. Standardized throughout the plant by color, shape or size.
   b. Durable enough to withstand heat, cold, humidity or corrosiveness.
   c. Strong enough so that it cannot be removed without heavy force or tools such as bolt cutters.
   d. Identified by the name of the employee who installs and removes it.

2. The authorized employee (one who performs maintenance or servicing) shall identify the type and magnitude of the energy that the machine or equipment utilizes, shall understand the hazards of the energy, and shall know the methods to control the energy.

3. The authorized employee is to notify all affected employees that servicing or maintenance is required on a machine or equipment, and that the machine or equipment must be shut down and locked out to perform the servicing or maintenance.

4. If the machine or equipment is operating, shut it down by the normal stopping procedure (depress stop button, open switch, close valve, etc.).

5. De-activate the energy isolating device(s) so that the machine or equipment is isolated from the energy source(s).

6. Stored or residual energy (such as that in capacitors, springs, elevated machine members, rotating flywheels, hydraulic systems, and air, gas, steam, or water pressure, etc.) must be dissipated or restrained by methods such as grounding, repositioning, blocking, bleeding down, etc.

7. Lockout the energy isolating devices with a lock(s).

8. Ensure that the equipment is disconnected from the energy source(s) by first checking that no personnel are exposed, then verify the isolation of the equipment by operating the push button or other normal operating control(s), or by testing to make certain the equipment will not operate.

9. **CAUTION:** *RETURN OPERATING CONTROL(S) TO NEUTRAL OR "OFF" POSITION AFTER VERIFYING THE ISOLATION OF THE EQUIPMENT.*

10. The machine or equipment is now locked out. Maintenance or servicing may be performed.

Sequence of Tagout System Procedure

1. The authorized employee shall use the tagout procedure ***ONLY WHEN THE MACHINE OR EQUIPMENT IS NOT CAPABLE OF BEING LOCKED OUT.***
2. The tagout device shall be standardized throughout the plant, and shall meet the following provisions:

    a. Easy to read and understand, even if used in dirty, corrosive, or damp areas.
    b. Can't be released with less than 50 pounds of pressure.
    c. Can be attached by hand.
    d. Is self-locking.
    e. Shows the identity of the authorized employee.
    f. Can't be reused.

3. The tag out device shall be attached at the same location that the lockout device would have been attached.

4. Authorized employees shall utilize additional means as necessary to provide the equivalent safety available from the use of a lockout device. Additional safety measures that reduce the likelihood of inadvertent energization may include:

    a. The removal of an isolating circuit element;
    b. Blocking of a controlling switch;
    c. Opening of an extra disconnecting device; or
    d. The removal of a valve handle.

Restoring Machines/Equipment to Normal Production Operations

When the servicing is completed and the equipment is ready to return to normal operating condition, the following steps shall be taken:

1. Check the work area to ensure that all employees are a safe distance from the equipment.

2. Check the machine or equipment and the immediate area around the machine or equipment to ensure that nonessential items (such as tools) have been removed, and that the machine or equipment components are operationally intact.

3. Reinstall any machine guards.

4. Verify that the controls are in neutral.

5. Remove the lockout and/or tagout devices and reenergize the machine or equipment.

6. Notify affected employees that the servicing or maintenance is completed and the machine or equipment is ready for use.

    NOTE: The removal of some forms of blocking may require re-energizing of the machine before safe removal. When maintenance or service is done, only the same authorized employee who installed the lock may remove it. When the authorized employee is not available to remove the lock, a "Lockout Removal" form must be completed by the employee removing the lock (see attachment Procedure for Lockout & Tag out Removal).

Procedure Involving More Than One Person

In the preceding steps, if more than one individual is required to lockout or tagout equipment, each shall place his or her own personal lockout or tagout device on the energy isolating device(s).

When an energy-isolating device cannot accept multiple locks or tags, a multiple lockout or tag out device (hasp) may be used. If lockout is used, a single lock may be used to lockout the machine or equipment with the key being placed in a lockout box or cabinet, which allows the multiple locks to secure it. Each employee will then use his or her own lock to secure the box or cabinet. As a person no longer needs to maintain his or her lockout protection, that person will remove his or her lock from the box or cabinet.

Documentation

1. Procedural steps for lockout/tag out for all machines shall be documented on the Lockout/Tag out Schedule form (see attachment). A copy of this form will be given to the authorized employee and will be kept in the Safety Coordinator's office.

2. Documentation of employee training shall be kept on file in each employee's training file.

3. An inspection shall be performed, certified and documented annually, under the direction of the Safety Manager, to assure compliance with the written program. This will be kept in the Safety Manager's office. The purpose is to ensure that the written procedures and the requirements of the standard are being followed, and that employees understand their responsibilities under the procedures.

Basic Rules for Using Lockout or Tagout System Procedure

All equipment shall be locked out or tagged out to protect against accidental or inadvertent operations when such operations could cause injury to personnel. Do not attempt to operate any switch, valve, or other energy-isolating device where it is locked or tagged out.

This standard does not apply to work on cord and plug connected to electrical equipment for which exposure to the hazards of unexpected energizing or start up the equipment is controlled by the unplugging of the equipment from the energy source and by the plug being under the exclusive control of the employee performing the servicing or maintenance.

In the event a piece of equipment is to be isolated for a period of time exceeding one normal shift and the isolating means is not capable of being locked out, a reasonable effort will be made to affix a device to the isolating means to make capable of being locked out.

Affected Employees for Lockout/Tag out

Because people may be moved from one work area to another, it would not be appropriate or practical to generate a list of people identified with a particular area. Therefore, the person who initiates, or terminates, a lockout or tag out procedure will notify those persons in the affected area.

Periodic Inspection

A periodic inspection is done, looking at the energy control procedures performed to ensure that the procedure and requirements of the standard are being followed. This inspection is performed annually (see attachment).

Sierra Packaging and Converting, LLC

Lockout/Tag out Schedule

Equipment or Process:_____

Location of Equipment: _____

A tag is required on each Isolation Location listed below
The Specific Type of Lock must be applied at the location listed

Date prepared _____ Prepared by _____

Type of Energy	Isolation Location	Type of Lockout Device
Electrical		
Potential (Stored)		
Kinetic (in-motion)		
Pneumatic (air - gas pressure)		
Hydraulic		
Thermal		
Chemical		

Special Hazards	Procedure for Control of Special Hazard

Special Procedures

Stored Energy Release Procedure

Notes
Isolation Location shall positively identify the exact breaker, valve, switch or other disconnect or blocking device to be locked and tagged to isolate the source of energy from the work area.
Type of Lockout shall specifically name the exact type of locking device needed to ensure the disconnect or blocking device stays in the isolated condition/position. i.e.. Breaker Clip, Valve Handwheel Cover, Blank Flange, etc.
Stored Energy: Following the application of the lockout or tagout devices to the energy isolating devices, all potential or residual energy will be relieved, disconnected, restrained, and otherwise rendered safe.

Procedure for Lockout/Tag out Removal

This form must be completed before removal of any lockout or tag out by a person other than the person placing the lockout or tag out on equipment.

Lockout/Tag out originator has been called and:

_____ was reached and reported back to work to remove lock or tag.

_____ could not be reached.

Equipment Locked/Tagged Out _____ Date _____

Location _____

Reason Locked/Tagged Out _____

_____

Person Locking/Tagging Out _____ Date _____

Reason Removing Lock or Tag _____

_____

_____

Have you checked to ensure safety of removal? ____ Yes ____ No

_____
Employee Signature

Cc: Safety Manager
Supervisor

Periodic – Annual Observation of Lockout Tag out Program

EMPLOYEE BEING OBSERVED	PLANT #	DEPT. #

BLDG. #	MACHINE/EQUIPMENT/PROCESS	EQUIP. #

OBSERVATION QUESTION	YES	NO	COMMENTS
1. Has all energy-isolating device been located?			
2. Does the plant provide devices specifically for lockout/tag out procedures?			
3. Are lockout/tag out devices durable enough to withstand plant conditions?			
4. When only tag out devices are used, are attachments non-reusable, attachable by hand, self-locking and non-releasable with minimum unlocking strength of 50 lbs.?			
5. Can the person using a lockout/tag out device be easily identified?			
Authorization: 6. Is an authorized person performing the lockout/tag out?			
Preparation: 7. Are affected employees notified when there is an application or removal of lockout/tag out devices?			
Shutdown: 8. Are normal "shutdown" procedures followed?			
Energy Isolation: 9. Are energy isolating device(s) located and energy source(s) separated from the machine?			
Lockout/Tag out Device Application: 10. Are lockout/tag out devices placed on each energy-isolating device?			
OBSERVATION QUESTION			
Stored Energy: 11. Are potentially hazardous, stored or residual energy relieved, disconnected or restrained?			
Verification of Isolation: 12. Does the authorized employee verify that de-energizing of the equipment has been accomplished?			

Inspection: 13. Prior to removing locks/tags, has the work area been inspected, nonessential items removed and the machine components including guards, made operationally intact?			
Employee Notification: 14. Prior to removing locks/tags, have affected employees been notified and the work area inspected to ensure all employees are in a safe position?			
Lockout/Tag out Device Removal: 15. Have Lockout/Tag out devices been removed by the person who applied them?			
COMMENTS:			

OBSERVER INFORMATION

OBSERVER EMPLOYEE #	OBSERVER SIGNATURE	TITLE	DEPT.	DATE
EMPLOYEE #	**EMPLOYEE SIGNATURE**	**TITLE**	**DEPT.**	**DATE**

Annual Lockout – Tag out Administrative Review

Facility _____ Date _____

The Lockout – Tag out procedures for this facility have been reviewed for necessary changes. Each piece of equipment is listed and the required Lockout – Tag out isolation points (valves, breakers, disconnects, etc.) are properly identified.

Responsible Manager _____

The following changes have been made: (if no changes write "None")

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

Electrical Safety & Ground Fault Protection Plan

Purpose

The Electrical Safety program is designed to prevent electrically related injuries and property damage. This program also provides for proper training of maintenance employees to ensure they have the requisite knowledge and understanding of electrical work practices and procedures. Only employees qualified in this program may conduct adjustment, repair or replacement of electrical components or equipment. Electricity has long been recognized as a serious workplace hazard, exposing employees to such dangers as electric shock, electrocution, fires and explosions. References: NFPA 70E, Electrical Safety Requirements for Employee Workplaces, National Electrical Code (NEC) and OSHA Standard (Electrical Safety) 29 CFR 1910.331 to 1910.339.

Administrative Duties

We have designated the following competent person(s) to implement the program: [Safety Manager Name], Safety Manager. The competent person(s) are responsible for developing and maintaining this written Electrical Safety Plan.

They are qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer and oversee our electrical safety plan and conduct the required evaluations of plan effectiveness.

Electrical Equipment

Examination

Electrical equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees. Safety of equipment shall be determined using the following considerations:

- Suitability for installation and use in conformity with the provisions of this subpart. Suitability of equipment for an identified purpose may be evidenced by listing or labeling for that identified purpose.

- Mechanical strength and durability, including, for parts designed to enclose and

protect other equipment, the adequacy of the protection thus provided.

- Electrical insulation.
- Heating effects under conditions of use.
- Arcing effects.
- Classification by type, size, voltage, current capacity, and specific use.
- Other factors which contribute to the practical safeguarding of employees using or likely to come in contact with the equipment.

Equipment Grounding Conductor Program

This written plan is intended to establish and implement specific procedures for an equipment grounding conductor program covering:

- all cord sets,
- receptacles which are not a part of the building or structure, and
- equipment connected by cord and plug which are available for use or used by employees.

Equipment Grounding Conductor Inspection

Each cord set, attachment cap, plug and receptacle of cord sets, and any equipment connected by cord and plug, except cord sets and receptacles which are fixed and not exposed to damage, are visually inspected by Supervisor before each day's use for external defects, such as deformed or missing pins or insulation damage, and indications of possible internal damage.

Equipment found damaged or defective is not to be used until repaired, and is to be removed from service immediately by the person finding it and handed over to Supervisor.

Equipment Grounding Conductor Testing

The following tests are performed on all cord sets, receptacles which are not a part of the permanent wiring of the building or structure, and cord- and plug-connected

equipment required to be grounded:

- All equipment grounding conductors are tested for continuity and are electrically continuous.

- Each receptacle and attachment cap or plug is tested by (enter your answer) for correct attachment of the equipment grounding conductor. The equipment grounding conductor is connected to its proper terminal.

All required tests are performed:

- Before first use.
- Before equipment is returned to service following any repairs.
- Before equipment is used after any incident which can be reasonably suspected to have caused damage (for example, when a cord set is run over).
- At intervals not to exceed 3 months, except that cord sets and receptacles which are fixed and not exposed to damage will be tested at intervals not exceeding 6 months.

Sierra Packaging and Converting, LLC does not provide or permit employees to use any equipment which has not met the requirements of this program.

Recordkeeping

Tests performed as required in this program are recorded. The test records:
identify each receptacle, cord set, and cord- and plug-connected equipment that passed the test, and indicate the last date it was tested or the interval for which it was tested.

The Safety Manager is responsible for maintaining these records.

Personal Protective Equipment

Employees working in areas where the potential contact with exposed electrical sources are present and likely, will be provided and shall use Personal Protective Equipment (PPE). The following rules apply to the use and care of PPEs:

- PPE shall be used where contact with exposed electrical sources are present and likely.

- PPE shall be designed for the work being performed and environment in which it is used.

- PPE shall be visually inspected and/or tested before use. Any defects or damage shall be replaced, repaired or discarded.

- In cases where the insulating capabilities of the PPEs may be damaged during the work, a protective outer cover, such as leather, must be used.

Employee shall wear protective eye/face equipment whenever there is a danger from electrical arcs or flashes or from flying objects resulting from an electrical explosion.

Working at Elevated Locations

Any person working on electrical equipment elevated must take necessary precautions to prevent a fall from reaction to electrical shock or other causes. A second person, knowledgeable as a safety watch, must assume the best possible position to assist the worker in case of an accident. Portable ladders shall have non-conductive siderails if they are used where the employee or the ladder could contact exposed energized parts.

General Protective Equipment and Tools

General Protective Equipment and Tools shall be used when in the proximity of, or working on, exposed energized parts. The following rules apply:

- When working on or near exposed energized parts, Qualified Employees shall use insulated tools or handling equipment suitable for the voltage present and working environment. In cases where the insulation may be damaged, a protective outer layer should be employed.

- Fuse handling equipment, insulated for the circuit voltage, shall be used to remove or install fuses when the terminal is energized.

- Ropes and other hand lines used near exposed energized equipment shall be non-conductive.

Warnings and Barricades

Warnings and barricades shall be employed to alert unqualified Employees of the present danger related to exposed energized parts. The following rules apply:

- Safety signs, warning tags, etc., must be used to warn Unqualified Employees of the electrical hazards present, even temporarily, that may endanger them.

- Non-conductive barricades shall be used with safety signs to prevent Unqualified Employees access to exposed energized parts or areas.

- Where barricades and warning signs do not provide adequate protection from electrical hazards, an Attendant shall be stationed to warn and protect Employees.

Powered Equipment Safety Rules

Electrical equipment is defined as cord or plug-type electrical devices which includes the use of flexible or extension cords. Examples of portable electrical equipment included powered hand tools, powered bench tools, fans, radios, etc. The following safety rules apply to portable electrical equipment (PEE):

- PEE shall be handled in such a manner as to not cause damage. Power cords may not be stapled or otherwise hung in a way that may cause damage to the outer jacket or insulation.

- PEE shall be visually inspected for damage, wear, cracked or spilt outer jackets or insulation, etc., before use or before each shift. PEE that remain connected once put in place need not be inspected until relocated. Any defects; such as cracked or split outer jackets or insulation must be repaired, replaced or placed out of service.

- Always check the compatibility of cord sets and receptacles for proper use.

- Ground type cord sets may only be used with ground type receptacles when used with equipment requiring a ground type conductor.

- Attachment plugs and receptacle may not be altered or connected in a way that would prevent the proper continuity of the equipment grounding conductor. Adapters may not be used if they interrupt the continuity of the grounding conductor.

- Only portable electrical equipment that is double insulated or designed for use in areas that are wet or likely to contact conductive liquids may be used.

- Employees that are wet or have wet hands may not handle PEEs (plug-in, un-plug, etc.). Personal protective equipment must be used when handling PEEs that are wet or covered with a conductive liquid.

- Locking-type connectors shall be properly secured after connection to a power source.

Electrical Circuit Safety Procedures

Electrical power and lighting circuits are defined as devices specifically designed to connect, disconnect or reverse circuits under a power load condition. When these circuits are employed, the following rules apply:

- Cable connectors (not of load-break type) fuses, terminal plugs or cable splice connectors may not be used, unless an emergency, to connect, disconnect or reverse in place of proper electrical circuits.

- After a protective circuit is disconnected or opened, it may not be connected or closed until it has been determined that the equipment and circuit can be safely energized.

- Overcurrent protectors of circuits or connected circuits may not be modified, even on a temporary basis, beyond the installation safety requirements.

- Only Qualified Employees may perform test on electrical circuits or equipment.

- Test equipment and all associated test leads, cables, power cords, probes and connectors shall be visually inspected for external damage before use. Any damage or defects shall be repaired before use or placed out of service.

- Test equipment shall be rated to meet or exceed the voltage being tested and fit for the environment in which it is being used.

- Where flammable or ignitable materials are stored, even occasionally, electrical equipment capable of igniting them may not be used unless measures are taken to prevent hazardous conditions from developing.

This record is kept by means of an inspection log and is maintained until replaced by a more current record. The record is made available on the job site for inspection by OSHA and any affected employee.

Electrical Lockout Tagout Requirements

See the Lockout Tagout Program for complete requirements.

Training

Training is provided to ensure that employees are familiar with the requirements of this plan. This training is provided to employees at the time of hire and annually thereafter.

[Safety Manager Name], Safety Manager is responsible for conducting training.
The training program addresses the required written elements for electrical safety for:

- The assured equipment grounding conductor program.
- Lockout and tagging procedures to be used when working on exposed de-energized parts.

Training for Non-Qualified Employees

Training for Non-Qualified Employees is general electrical safety precautions to provide an awareness and understanding of electrical hazards.

Electrical Safety Rules for Non-Qualified Workers

1. Do not conduct any repairs to electrical equipment
2. Report all electrical deficiencies to your supervisor
3. Do not operate equipment if you suspect and electrical hazard.
4. Water and electricity do not mix.
5. Even low voltages can kill or injure you
6. Do not use cords or plugs if the ground prong is missing
7. Do not overload electrical receptacles

Training for Qualified Employees

Training for Qualified Employees includes specific equipment procedures and requirements of:

Electrical Safety, 29 CFR 1910.331 to 1910.339

Standard Operating Procedure

Working on or Near Exposed Energized Circuits

In the rare situation when energized equipment (or working in near proximity to energized equipment) can not be de-energized, the following work practices must be used to provide protection:

- Caution: Unqualified Employees are prohibited from working on or near exposed energized circuits.
- Obtain permission from Manager to work on or near energized electrical circuits
- Lockout and Tagout all circuits possible
- Treat all circuits as energized.
- Remove all conductive clothing and jewelry (rings, watches, wrist/neck chains, metal buttons, metal writing instruments, etc.).
- Use proper personal protective equipment, shields and/or barriers to provide effective electrical insulation from energized circuits. This may include electrically rated insulated gloves, aprons, rubber soled shoes, insulated shields, insulated tools, etc.
- Provide adequate lighting. Do not enter areas with exposed energized parts unless illumination (lighting) is provided so that Employee may work safely. Do not reach around obstructions of view or lighting (blindly) into areas where exposed energized parts are located.
- Employees entering a Confined Space with exposed energized parts, must use protective barriers, shields, or equipment or insulated materials rated at or above the present voltage to avoid contact.
- Doors or other hinged panels shall be constructed and secured to prevent them from swinging into an Employee and causing contact with exposed energized parts.

- Housekeeping in areas of exposed energized parts may not be completed in areas with close contact unless adequate safeguards (insulation equipment or barriers) are present. Conductive cleaning material (Steel Wool, Silicon Carbide, etc.) or liquids may not be used unless procedures (Lock and Tag Out, etc.) are in place and followed.

- Station a safety observer outside work area. The sole function of this person is to quickly deenergize all sources of power or pull worker free from electrical work area with a non-conductive safety rope if contact is made with an energized electrical circuit.

Standard Operating Procedure

Re-energizing Electrical Circuits After Work Completed

These requirements shall be met, in the order given, before circuits or equipment are reenergized, even temporarily.

- A qualified person shall conduct tests and visual inspections, as necessary, to verify that all tools, electrical jumpers, shorts, grounds, and other such devices have been removed, so that the circuits and equipment can be safely energized.

- Warn employees exposed to the hazards associated with reenergizing the circuit or equipment to stay clear of circuits and equipment.

- Remove each lock and tag. They shall be removed by the employee who applied it or under his or her direct supervision. However, if this employee is absent from the workplace, then the lock or tag may be removed by a qualified supervisor designated to perform this task provided that:
- The supervisor ensures that the employee who applied the lock or tag is not available at the workplace, and

- The supervisor ensures that the employee is aware that the lock or tag has been removed before he or she resumes work at that workplace.

- Conduct a visual determination that all employees are clear of the circuits and equipment.

Program Evaluation

The Electrical Safety Plan is evaluated and updated annually by the Safety Manager to ensure the continued effectiveness of the program.

Machinery & Machine Guarding Safety

Purpose

It is the policy of Sierra Packaging and Converting, LLC to permit only trained and authorized employees to operate machinery, tools, or equipment at any time. This policy is applicable to:

- daily operators of machinery, tools, and equipment; and
- those who only occasionally have cause to use machinery, tools, or equipment.

This written Machine/Equipment Safety and Guarding Plan describes methods and practices for care and use of machines, equipment, and tools that can be read and understood by all managers, supervisors, and employees at Sierra Packaging and Converting, LLC. This written plan is intended to be used to:

- create an awareness of the hazards among our workforce,
- standardize procedures for use and care of the equipment,
- provide a consistent format for training employees on the proper procedures to be used,
- minimize the possibility of injury or harm to our employees, and
- demonstrate Sierra Packaging and Converting, LLC's compliance with machine safety and equipment usage requirements for general industry in Subpart O and P of 29 CFR 1910.

Administrative Duties

[Safety Manager Name], Safety Manager, is responsible for developing and maintaining this written Machine/Equipment Safety and Guarding Plan. This person is solely responsible for all facets of the plan and has full authority to make necessary decisions to ensure the success of this plan. [Safety Manager Name] is also qualified, by appropriate training and experience that is commensurate with the complexity of the plan, to administer or oversee our machine/equipment safety program and conduct the required evaluations.

This written Machine/Equipment Safety and Guarding Plan is kept in the Safety Manager's office.

If, after reading this plan, you find that improvements can be made, please contact [Safety Manager Name], Safety Manager. We encourage all suggestions because we are committed to creating a safe workplace for all our employees, and a safe and effective machine/equipment safety and guarding program is an important component of our overall safety plan. We strive for clear understanding, safe work practices, and involvement in the program from every level of the company.

Policy

All mechanical motion is potentially hazardous. Motion hazards, such as rotating devices, cutting or shearing blades, in-running nip points, reciprocating parts, linear moving belts and pulleys, meshing gears, and uncontrolled movement of failing parts, are examples of motion and peculiar to any one machine or job operation. Employees working within areas where they are exposed to machinery or equipment hazards must be aware of the potential for accidents. Machine operators and others are exposed to moving parts and can get clothing or body parts caught in the machinery.

Training

Employees will be trained to:

1. Safely operate each machine they will be required to use
2. To recognize potential accident producing situations, and
3. To know what to do when hazards are discovered.

Only employees who have been thoroughly trained, or those who are undergoing supervised on-the-job training on the equipment, will be permitted to operate machinery.

Personal Protective Equipment

Eye protection or face shields will be worn by all employees within areas where machines are operated.

Loose fitting clothing, neckties, rings, bracelets, or other apparel that may become entangled in moving machinery will not be worn by machine operators or their helpers.

Hair nets or caps will be worn to keep long hair away from moving machinery.

Gloves will not be worn where there is a chance of them being caught in machinery.

Ear plugs or muffs will be used when required for worker protection.

The Safety Manager should be contacted to assist Supervisors in determining employees protective equipment needs.

Environmental

Machines designed for fixed locations will normally be securely fastened to the floor or other suitable foundation to eliminate all movement or "walking." Machines equipped with rubber feet, non-skid foot pads, or similar vibration dampening materials will be installed according to the manufacturer's recommendations.

Machines that have the potential of tipping or falling over will be firmly secured.

Machines that develop fine dust and fumes will be equipped with effective exhaust hoods, connected to an effective exhaust system. An interlocking device should be installed to link the machine's power supply and the exhaust system to prevent the operation of machines without the exhaust system operating.

Machines will never be left unattended with the power on unless the worker is operating more than one machine in a battery of machines. In this latter instance, the clear zone will be appropriately marked to include all machines in the group.

No attempt will be made to clean any part of a machine until the moving parts have come to a complete stop. Chips will not be removed from machinery by hand. Hand brushes should be used but compressed air may be used when reduced to less than 30 psi and then only with effective chip guarding and personal protective equipment.

Brushes, swabs, lubricating rolls, and automatic or manual pressure guns will be used by operators to lubricate material, punches, or dies. This equipment will be used so that

operators are not required to reach into the point of operation or other hazardous area.

Housekeeping

Floors will be kept in good repair and free of chips, dust, metal scraps, and other slipping and tripping hazards.

Waste containers will be emptied daily or more often, if necessary, to prevent excessive waste accumulations.

All materials, including usable scrap, will be stored so that they will not present a hazard.

Drip pans will be used whenever equipment must be oiled. Machinery will not be in motion when being lubricated unless lubrication is automatic or a long gravity flow spout is used, enabling the oiler to remain in the clear while performing this task.

Material Handling

Trucks used for scrap disposal will not be overloaded, and scrap will not extend beyond the ends or sides of trucks.

When materials are of a weight or size which makes manual lifting hazardous, mechanical handling equipment will be used.

Maintenance and Repair

When maintenance or repair is needed, machines will be completely shut down and the control switch(es) locked and tagged in the "OFF" position.

Cutting tools will be kept sharp and forming tools well dressed and free from accumulations of chips, dust, and other foreign matter. Where two or more cutting tools are used in one cutting head, they will be properly adjusted and balanced.

Damaged cutting tools will be removed from service and will not be used until repaired.

Machine Usage

Machines will be used only for work within the rated capacity specified by the machine manufacturer.

Machines will be maintained so that while running at full or idle speed, with the largest cutting tool attached, they are free of excessive vibration.

Machines will be completely stopped before attempting to clear jammed work or debris.

No saw blade, cutter head, or tool collar will be placed or mounted on a machine arbor, unless it has been accurately sized and shaped to fit the arbor.

Electrical Safeguards

The motor "START" button will be protected against accidental/inadvertent operation. "START" buttons will not be wedged for continuous operation.

The wiring and grounding of machinery will be in accordance with the National Electric Code.

Each machine will have a positive electrical disconnect or isolation switch which can be locked out.

Electrically driven machines will be equipped with undervoltage protective systems to preclude automatic restart after either a power failure or other undervoltage condition.

Machine Controls

Foot pedal mechanisms will be located and guarded so that they cannot be activated by falling objects or other accidental means. A pad with a non-slip contact area will be firmly attached to the pedal.

Controls will be available to the workers at their operating positions so that they do not reach over moving parts of the equipment. Control functions will be identified by printed words and color coding. Controls will not be wedged for continuous operation.

Power controls must have a way of locking out electrical power. Disconnecting or isolating switches will be mounted on a visible side of, or near, the machine and will be used to lock out power to the machine during repairs or adjustments. When the power is locked out, the isolating switch will be tagged.

Training Program

Under no circumstances will an employee operate a piece of machinery or equipment until he/she has successfully completed this company's machinery and equipment training program. This includes all new operators or users of machinery and equipment, regardless of claimed previous experience.

The company training program usually includes supervised on-the-job training unless

Sierra Packaging and Converting, LLC

Accident Prevention & Safety Manual

Origination Date:		Revision Date:	APRIL 18, 2011
Release Authorized by:	David Hodges		
Title:	Safety Manager		

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Corporate Safety Policies and Procedures

Many companies have written safety plans for individual safety topics, but few have an umbrella plan to summarize overall safety. This safety policy states Sierra Packaging and Converting, LLC's overall view of safety and the tenets of the safety program for our various work sites.

In order to establish and organize good safety policies and procedures, this General Safety Policies and Procedures Written Plan summarizes information regarding safety policies and procedures at this Company. [Safety Manager Name], Safety Manager, is responsible for implementing and updating this plan. The plan is kept in the Safety Manager's Office.

General Company Safety Philosophy Statement

This general Company safety philosophy has been developed to reflect and communicate the proactive safety attitude maintained at this Company.
The Company will comply with appropriate safety and security laws and regulations such as those established by:

- The Occupational Safety and Health Act (OSHA),
- The EPA (Environmental Protection Agency),
- The DOT (Department of Transportation), and
- All other applicable federal, state, and local safety and health regulations.

In addition, our corporate safety philosophy includes the following vision statements:

> The Company will comply with appropriate safety and security laws and regulations such as those established by OSHA, EPA, DOT, and all other applicable federal, state, and local safety and health regulations.
>
> We believe that the safety of employees is of utmost importance, along with quality, production, and cost-control. Maintaining safe operating procedures at all times is of both monetary and human value, with the human value being far greater to the employer, the employee, and the community. The following principles support this philosophy:
>
> - All injuries and accidents are preventable through establishment and compliance with safe work procedures.

- The prevention of bodily injury and safeguarding of health are the first considerations in all workplace actions and are the responsibility of every employee at every level.

- Written safety plans describing the safe work practices and procedures to be practiced in all workplace actions are an essential element of the overall workplace safety program. All employees at every level are responsible for knowing and following the safety practices described in the written safety plans.

- Off the job, all employees should be similarly safe and demonstrate awareness of potential hazards.

Types of Written Safety Plans In Place

Because we care about our employees and strive to provide a safe work place, we have put into place a number of written safety plans. These written plans provide guidance and direction for the safety issues they cover. Those plans are covered throughout this Accident Prevention and Safety Manual.

Employer/Employee Responsibilities

This section lists responsibilities of employers and employees. These responsibilities are to be taken seriously at all times.

- It is the policy of this Company to provide a place of employment reasonably free from hazards, which may cause illness, injury, or death to associates. It is also this Company's policy to establish an effective and continuous safety program incorporating educational and monitoring procedures maintained to teach safety, correct deficiencies, and provide a safe, clean working environment. All Company supervisors, managers, directors, and officers are responsible for the enforcement of safety policies and practices. They must ensure that:

  Their staff members are trained in appropriate safety procedures, including chemical-specific training as required. Individual safety files are maintained in Personnel for all associates.

- They notify the Safety Manager and complete the necessary forms if an accident or work-related health problem occurs in the work area.

- Equipment and property within their area of responsibility is maintained in a

safe, hazard-free condition

All employees have a responsibility to themselves and to the Company for their safety and the safety of the coworkers. All employees are required to:

- Comply with all federal, state, and local rules and regulations relevant to their work.
- Observe all Company rules and regulations related to the efficient and safe performance of their work.
- Integrate safety into each job function and live by this philosophy in the performance of job duties.
- Report or correct unsafe equipment and practices.
- Report any accidents that occur while on the job.

Disciplinary Policy

All safety rules, procedures, and plans in effect at this Company with the intention of being followed. Upon violation of any Company safety rule, the violating employee will be penalized. The list of possible disciplinary actions includes:

- Verbal reprimand:

  An informal discussion of the incorrect behavior that should take place as soon as possible after the supervisor has knowledge of the safety misconduct.

- Written reprimand:

  A written form documenting the safety misconduct, to be presented to the employee and placed in the employee's personnel file.

- Probation:

  A trial period during which the employee is given specific rules and goals to meet, during which, if he or she cannot meet the rules and goals, he or she is subject to termination.

- Suspension:

  A period of time during which the employee is debarred from the function of attending work and during which the employee is not paid.

- Dismissal/termination of employment:

  The permanent separation of an employee from the Company, initiated for disciplinary reasons, safety misconduct

Certain circumstances warrant disciplinary action.

Upon violation of any Company safety rule, the violating employee will be penalized. The severity of the penalty will be in direct correlation to the severity of the safety violation.

Designated Safety Manager

The designation of a Safety Manager is the most critical part of preparing ourselves to succeed or fail with the establishment and maintenance of our company safety program. The designated Safety Manager is the glue that holds the many aspects of your program together.

Sierra Packaging and Converting, LLC has designated David Hodges as our Safety Manager.

The key critical ingredients considered in making this decision were:

1. *Willingness* - the person chosen must indicate a genuine interest and desire to do this work.

2. *Knowledge* - College degrees in Safety and/or experience in the field are necessary for a full time Safety program.

3. *Money* - A budget needs to be established for this program to, at a minimum, include the following.

    a. Reference material - software, books, etc.....
    b. Designated person attending seminars.....
    c. Safety committee meetings.....
    d. Incentive Program.....

4. Estimating our fines arrives at the total cost/savings benefit ratio, should OSHA inspect our business before we become prepared, and the plus or minus effect on your experience modifier. (Please see attached example.)

5. *Accountability* - The person to fulfill these tasks must be accountable only to the company's' General Manager in all matters of safety and health for these reasons:

    a. This plainly demonstrates uppermost management's commitment to the safety program.

    b. Maintains uppermost managements awareness and provides for guidance in all aspects of the program.

c. Prevents creativity of the designated safety person from being thwarted or stifled by intermediate supervisors who are unaware of the tremendous negative impact OSHA fines and increased workers' compensation premiums can have on the company's bottom line.

Job Responsibility Definitions

Safety Manager Responsibilities

1. Will be responsible for the administration and implementation of the Safety and Health Regulations as they apply to Sierra Packaging and Converting, LLC. In addition, he/she will administer the company safety program and see that it is put into effect and administered as outlined below.

2. Will see that a monthly report is completed, listing all accidents, which occurred during the preceding month. These will be reviewed to determine type and degree of accident so that corrective measures may be taken through safety talks to personnel, bulletins to employees, purchase of new equipment, or change in work procedures.

3. Will see that all sub and trade contractors abide by their safety and health program and that documentation is made of any alleged violations.

4. Will maintain and update a set of basic safe work rules. The company Safety Manager to the General Manager and Lead person who, in turn, will discuss these with employees during on-the-job safety talks will explain these safety rules. Company safety rules will be posted in all work areas.

5. Will periodically conduct safety inspections and file reports.

6. Will provide safety training for employees.

7. Will read, review and provide the President and Lead person with updated OSHA Safety Standards.

8. Will make necessary corrections in company policy and work procedures by advising of changes in OSHA rules and regulations.

9. Through the purchasing section, will see that all vendors are advised of the company safety and health programs as they apply to the vendor and supplier personnel entering the job site. In addition, all purchase orders will require compliance with OSHA Act.

10. Will meet regularly with supervisors/management to review safety procedures on the job, and, in general, check on the supervision's compliance with the company safety and health program.

General Manager's Responsibilities

1. Read and review the OSHA Safety Standards and become knowledgeable of federal, state and local standards.

2. Responsible to see that a study is made of the work area(s) to determine the exposure to accidents, which may develop. Particular attention will be given to the protection of the public and to fire prevention facilities.

3. Be safety oriented when walking through work areas. Report to the Safety Manager any unsafe acts and conditions either of your company's or sub or trade contractors' personnel.

4. Review all accident reports.

Supervisor's Responsibilities

1. The Supervisor is responsible for the implementation of the company safety and health program.

2. Make available all necessary personal protective equipment, job safety materials, and First Aid equipment.

3. Instruct the Lead person that safe practices are to be followed and safe conditions maintained throughout the job.

4. Inform the Lead person that they are not to require nor permit their workers to take chances -rather that they instruct the workers in proper and safe procedures.

5. Instruct Lead person individually, regarding their safety responsibilities.

6. Require all contractors and their prime subcontractors to adhere to all safety regulations. The Supervisor will report any unsafe conditions on contractor portions of the work to the Safety Manager.

7. Review all accidents with Lead person(s) and see that corrective action is taken immediately.

8. Be familiar with the laws pertaining to safety and their basic requirements.

9. Investigate all accidents. File a complete accident report with the Safety Manager and correct the causes immediately. Use OSHA Form 301 or its equivalent.

10. Be familiar with the laws pertaining to safety and their basic requirements.

Employee Responsibilities

1. Work according to good safety practices as posted, instructed and discussed.

2. Refrain from any unsafe act that might endanger himself/herself or his/her fellow workers.

3. Use all safety devices provided for his/her protection.

4. Immediately report any unsafe situation or acts to his/her supervisor or safety personnel.

5. In the event of an injury, report to the designated area for First Aid treatment. In all cases, the employee, the Supervisor or Lead person will report and/or record all accidents.

6. Maintain a clean and safe work area.

7. Be a safe worker, off the job, as well as on.

Safety Committee Responsibilities

1. In general, the committee will serve in an advisory capacity to the Safety Manager on determining a general plan of action for the company's safety policy as set by management.

   More specifically, the members of the committee will familiarize themselves with safety standards and assist in formulating plans for the application of the standards in all work areas.

Training Policy

Sierra Packaging and Converting, LLC is committed to instructing all employees in safe and healthy work practices. The Company will provide training to each employee with regard to general, acceptable, safety procedures and to any hazards or safety procedures that are specific to that employee's work situation.

1. Training can take many forms and is synonymous with education and can be attained in a number of ways.

2. Company Safety Rules: Employees should read the rules and understand them. The issuance of these rules should be logged and signed receipts should be kept on file. Each new employee, as he arrives on the job, should be approached in the same manner.

3. Periodic Safety Talks – the company should attempt to hold a safety talk with their employees on a weekly or at least monthly basis. The talk may consist merely of restating the company safety rules or warning of dangerous conditions, which exist. A particular subject may be covered, such as lockout tag out, confined space, or fire prevention.

4. Changed Conditions -When a of the job operation changes or when new hazardous materials are brought into the workplace, employees should be made aware of new or added potential dangerous situations that might occur and the proper action employees can take to maintain a safe workplace.

5. Safety Equipment -Employees should not simply be issued protective equipment. They should be instructed as to its proper and safe use.

6. Consistency/Redundancy -The employer must consistently and routinely entertain the concept of safety training. Once is not enough. At the orientation meeting of new employees, on through the follow-up weekly/monthly safety talks, the central theme must be to dwell on employees not committing unsafe acts.

7. Management Follow-Up -Management must not be content with advising employees on unsafe practices. A follow-up of employee actions must be made. The Supervisor(s) must be instructed to watch for employees committing unsafe acts. Employees should be reprimanded when found doing unsafe acts. (See disciplinary program)

8. Documentation -All actions taken by Management as it relates to Safety Training/Education should be documented. Documentation of good faith efforts in meeting the training requirements can be invaluable in defending a lawsuit that results from an injury due to an unsafe act by an employee. Also, documentation substantiates your commitment to and compliance with the OSHA Training Requirements.

9. Individual/Group Instruction -Safety Education can be aimed at a group such as at a weekly/monthly safety talk or at an individual as in a case where the employee is being given instruction on use of a new tool, etc., by the Supervisor. Whichever the case may be, it should be documented.

In Closing

Safety training must be ongoing. It must be given to all employees and members of management. Documentation of instruction and other forms of safety awareness techniques must be made. Never assume everyone knows the safest way of performing his or her task.

Disciplinary Action Program

Role of Disciplinary Systems in the Workplace

The disciplinary system does not exist primarily to punish employees. Its purpose should be to control the work environment so that workers are protected and accidents are prevented. A disciplinary system helps ensure workplace safety and health by letting the Sierra Packaging and Converting, LLC's employees know what is expected of them. It provides workers with opportunities to correct their behavior before an accident happens.

A disciplinary system is one of the keys to successfully implementing the Company's safety and health program. It ensures that the Company's rules and safe working practices are taken seriously by employees and are actually followed. It lets employees know how Sierra Packaging and Converting, LLC expects them to operate in relation to the goals of the Company's safety and health program. And it lays out the actions the Company will take if individuals do not meet the Company's expectations. The employee's supervisor and all members of management are responsible for the enforcement of this disciplinary program.

A disciplinary system cannot work in a vacuum. Before the Company can hold employees accountable for their actions, the Company first needs to establish its safety and health policy and disciplinary rules.

Policy Statement

Employees need to know the Company's position on safety and health and what the Company expects of them. They need a clear understanding of the rules and the consequences of breaking those rules. This is true in all areas of work, but it is especially important for worker safety and health. As part of the policy statement, and in the employee safety handbook, the Company has a written statement setting forth the Company's disciplinary policy. Company managers and supervisors will always be on the lookout for safety violations and will conscientiously and vigorously enforce the Company's commitment to safety.

Employee Information and Training

It is important that employees understand the system and have a reference to turn to if they

have any questions. Therefore, in addition to issuing a written statement of the Company's disciplinary policy, the Company has drawn up a list of what it considers major violations of Company policy and less serious violations. This list specifies the disciplinary actions that will be taken for first, second, or repeated offenses. The Company will use the 5 Step Disciplinary System listed in Appendix B to correct minor, "General Offences" (that are listed on the next page).

- The list for immediate termination and grounds for immediate discharge are:

    - Drinking alcohol, and/or drug abuse prior to or during working hours
    - Fighting, provoking or engaging in an act of violence against another person on Company property
    - Theft
    - Willful damage to property
    - Failure to wear Personal Protective Equipment (eye protection, hearing protection, safety helmets, etc.).
    - Not using safety harnesses and lanyards when there is a potential for falling
    - Removing and/or making inoperative safety guards on tools and equipment
    - Tampering with machine safeguards or removing machine tags or locks
    - Removing barriers and/or guardrails and not replacing them
    - Failure to follow recognized industry practices
    - Failure to follow rules regarding the use of company equipment or materials
    - Major traffic violations while using a company vehicle
    - Engaging in dangerous horseplay
    - Failure to notify the Company of a hazardous situation and
    - Other major violations of company rules or policies

- General Offences requiring a warning and can lead to termination:

    - Minor traffic violations while using Company vehicles
    - Creating unsafe or unsanitary conditions or poor housekeeping habits
    - Threatening an act of violence against another person while on company property
    - Misrepresentation of facts
    - Unauthorized use of Company property
    - Excessive tardiness or unexcused absences
    - Disrespect and/or insubordination to authority
    - Other violations of Company Policy and rules

Training

Training can reduce the need for disciplinary action. The Company shall instruct employees in the importance of workplace safety and health, the need to develop safety habits, the Company's operations, safe work practices, and the hazards they control, and the standards of behavior that the Company expects. The Company's employees must understand the disciplinary system and the consequences of any deliberate, unacceptable behavior.

Supervision

Supervision includes both training and corrective action. Ongoing monitoring of the Company's employees' work and safety habits gives the Company's supervisors the opportunity to correct any problems before serious situations develop. In most cases, effective supervision means correcting a problem before issuing any punishment.

Where the relationship between employees and their supervisors is open and interactive, problems are discussed and solutions are mutually agreed upon. This type of relationship fosters a work environment where the need for disciplinary action is reduced. When such action is needed, the parties are more likely to perceive it as corrective than punitive.

Employee Involvement

Employees are encouraged to help informally in the enforcement of rules and practices. The intent here is not to turn employees into spies and informers, but to encourage them to be their "brother's keeper" and to watch out for the safety and health of their colleagues. Many employers successfully have encouraged an atmosphere -- a company "culture" – where employees readily speak up when they see an easily corrected problem, for example, a coworker who needs reminding to put on safety goggles.

The Company's employees deserve the opportunity to correct their own behavior problems. An effective disciplinary system is a two-way process. Once a problem is spotted, discuss it with the employee, who should be given at least one or two opportunities to change the behavior or correct the problem. Only after these discussions (and possibly some retraining) should disciplinary action be taken.

Appropriate Control Measures

Disciplinary actions need to be proportionate to the seriousness of the offense and the frequency of its occurrence. It is certainly inappropriate to fire someone for occasional tardiness. It is equally inappropriate to issue only oral warnings to an employee who repeatedly removes a machine guard. Appendix B provides an example of disciplinary actions in a five-step disciplinary system.

Disciplinary procedures should not be instituted without explanation. The Company will provide feedback to the employee on what behavior is unacceptable, why the corrective action is necessary, and how the employee can prevent future violations and disciplinary action. In addition, take time to recognize an employee who improves or corrects his/her behavior.

Consistent Enforcement

Workers must realize that safe work practices are a requirement of employment and that unsafe practices will not be tolerated. It is necessary, therefore, that the employer have a disciplinary system that is implemented fairly and consistently.

If the Company's disciplinary system is to work well and be accepted by the Company's workforce, the system applies equally to everyone. This includes subjecting managers and supervisors to similar rules and similar or even more stringent disciplinary procedures.

For minor violations, supervisors shall meet with the employee to discuss the infraction and inform the employee of the rule or procedure that was violated AND describe the corrective action needed to remedy the situation.

Documentation

One key to ensuring fairness and consistency in a disciplinary system is keeping good records. It is in the best interest of both the Company and the employee to have written rules and disciplinary procedures. It is just as important to document instances of good or poor safety and health behavior, including discussions with the employee, and to place relevant information in the employee's personnel file. The "Safety Hazard Citation" on the next page will be used to document infractions.

Documentation serves a variety of purposes. It helps the Company to track the development of a problem, corrective actions, and the impact of measures taken. It provides information so the Company can keep employees informed of problems that need correction.

When the Company is evaluating the managerial and supervisory skills of a supervisor, it provides a useful record of how they handled problems.

If warnings, retraining, and other corrective actions fail to achieve the desired effect, and if the Company decides to discharge an employee, then documentation becomes even more critical. Conversely, the Company will conduct an annual clearing of the personnel files of employees whose good overall safety records are marred by minor warnings.

Minor safety violations will be documented and a copy of the below form will become part of the employee's personnel record:

Safety Hazard Citation Date: _____

Name of Violator: _____

Location of Violation: _____

Type of Violation: _____

_____

_____

Violator's Signature _____

A Copy of this Citation will be placed in the employees Employment File
Three Citations can be grounds for termination

Positive Reinforcement

Each supervisor should provide frequent reinforcement of work practices training. The informal observation described above serves not only to gauge training effectiveness, but also to reinforce the desired behavior.

Recording and Reporting Injuries and Illnesses

Purpose

This Recording and Reporting Occupational Injuries and Illnesses Compliance Program explain our company's process for meeting the requirements of OSHA 29 CFR 1904. This regulation allows the Bureau of Labor Statistics under the U.S. Department of Labor to uniformly gather statistics on occupational injuries and illnesses. With this data, the Occupational Safety and Health Administration (OSHA) can identify and solve work-related exposures nationwide through new and revised regulations and guidance.

At the same time, the data can help Sierra Packaging and Converting, LLC identify its own company exposures and solve them with improved engineering, administrative, and work practice controls. It is essential that data we record be uniform, to assure the validity of the statistical data. This program is ultimately designed for the safety and health of our employees.

Administrative Duties

[Safety Manager Name], Safety Manager, is also our Recording and Reporting Occupational Injuries and Illnesses Compliance Program Administrator, is responsible for developing and maintaining this written program. This person has full authority to make necessary decisions to ensure the success of this program. Copies of this written program may be obtained from the Safety Manager's office. If after reading this program, you find that improvements can be made, please contact [Safety Manager Name]. We encourage all suggestions because we are committed to the success of this written program.

Employee Involvement

One of the goals of our program is to enhance employee involvement in the recordkeeping process. We believe that employee involvement is essential to the success of all aspects of safety and health for the company. This is especially true in the area of recordkeeping, because free and frank reporting by employees is the cornerstone of the system. If employees fail to report their injuries and illnesses, the "picture" of the workplace that the OSHA forms reveal will be inaccurate and misleading. This means that our company and our employees will not have the information we need to improve safety and health in the workplace.

Therefore, Sierra Packaging and Converting, LLC involves employees in our program in the following ways:

- Training employees on how to report work-related injuries and illnesses,
- Allowing employees access to report forms (with limitations), and/or
- Posting the annual summary of injuries and illnesses.

Employee Injury and Illness Reporting System

Our company takes employee reports of injuries and illnesses seriously. We use the following method for reporting:

Incidents (Injuries and Illnesses)

All work-related injuries and illnesses are to be reported to the Supervisor immediately or as soon as practically possible. Failure to report work related injuries and illnesses in a timely manner might result in the denial of benefits under the Workers' Compensation Law.

Upon being advised of the incident, the supervisor on duty at the time of the incident should report immediately to the scene of the occurrence to assure prompt medical attention for the employee(s) involved and address any safety hazards which may have caused or contributed to the incident. In the event the incident occurs outside the employee's work area, the supervisor on duty in the area where the incident occurs should report to the scene immediately.

Serious injury or illness posing a life-threatening situation shall be reported immediately to the local emergency response medical services (Call 911).

Injuries and illnesses shall be reported by the injured employee to his or her supervisor in person or by phone as soon after any life-threatening situation has been addressed. If the injured employee is unable to report immediately, then the incident should be reported as soon as possible.

Upon notification of an occupational injury or illness, the supervisor should notify the Safety Manager, who will then prepare the necessary record keeping forms.

Events

Incidents not involving injury or illness, but resulting in property damage, must also be reported to the involved employee's Supervisor immediately or as soon as practically possible.

In cases of a fire or explosion that cannot be controlled by one person, vehicular accident resulting in injury or more than $500 worth of damage, or a chemical release requiring a building evacuation, the involved party must immediately report the incident to the emergency response services in the area (911 – police, fire, etc.)

All near miss incidences are also required to be reported to the supervisor immediately or as soon as practically possible and recorded on the Incident Report Form within 48 hours of occurrence. In place of indicating the result of the incident (i.e., actual personal or property damage), the reporting person shall indicate the avoided injury or damage.

Events, hazardous working conditions or situations, and incidents involving contractor personnel must be reported to Supervisor and/or Safety Manager immediately.

Our reporting system ensures that Safety Manager and/or Supervisor receive the report. The Safety Manager has examined our existing reporting policies and practices to ensure that they encourage and do not discourage reporting and participation in our program. Also, Sierra Packaging and Converting, LLC does not discriminate against employees who file a work-related injury or illness or any other safety and health complaint.

Training

Our employees are expected to understand our occupational injury and illness reporting system, so that reports of work-related injuries and illnesses are received in a timely and systematized manner. Safety Manager will make arrangements with each Supervisor to schedule training for new employees. The Safety Manager is responsible for training each employee in how and when to report a work-related injury or illness.

Training topics include:

- The company's Injury and Illness Reporting Process,
- What is considered work-related and what is not,
- What is considered OSHA recordable and non-recordable,
- Each employee's right to access certain records, and
- Posting of the annual summary.

Training is done in a lecture and discussion format with some written materials provided. All training and information is provided in a language the trainees will understand. The company's training program includes an opportunity for employees to ask questions and receive answers a physically present and qualified trainer.

The Safety Manager is responsible for keeping records certifying each employee who has successfully completed training. Each certificate includes: trainee name, date of training, and trainer's signature.

Recording Injuries and Illnesses

Sierra Packaging and Converting, LLC keeps records of its employee fatalities, injuries, and illnesses that:

- Is work-related; and
- Is a new case; and
- Meets one or more of the general recording criteria of Sec. 1904.7 or the application to specific cases of Sec. 1904.8 through Sec. 1904.12.

Each recordable injury or illness is entered on OSHA 300 Log of Work-Related Injuries and Illnesses, OSHA 301Form Injury and Illness Incident Report, and a separate, confidential list of privacy-concern cases, if any, within (7) calendar days calendar days of receiving information that a recordable injury or illness has occurred. The Safety Manager keeps these records up to date.

If there is a privacy-concern case, we have the option to not enter the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses. Instead, the text "Privacy Case" is entered in the space normally used for the employee's name. This will protect the privacy of the injured or ill employee when another employee, a former employee, or an authorized employee representative is provided access to the OSHA 300 Log under Sec. 1904.35(b)(2). The company will keep a separate, confidential list of the case numbers and employee names for your privacy concern cases so that we can update the cases and provide the information to the government if asked to do so.

Annual Summary

At the end of each calendar year, Safety Manager performs the following steps:

1. Reviews OSHA 300 Log of Work-Related Injuries and Illnesses to verify that the entries are complete and accurate,

2. Corrects any deficiencies identified in the entries,

3. Creates an annual summary of injuries and illnesses recorded on OSHA 300 Log of Work-Related Injuries and Illnesses,

4. Ensures that he, [Safety Manager Name], who is the Safety Manager and "President" of the company certifies that he reasonably believes, based on his/her knowledge of the process by which the information was recorded, that the annual summary is correct and complete, and

5. Posts OSHA 300-A Summary of Work-Related Injuries and Illnesses on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

Employee Access to Report Forms

All employees, former employees, their personal representatives, and their authorized employee representatives have a right to access our regulatory-required injury and illness records, with the following limitations:

- We are allowed to give the requester a copy of OSHA 300 Log of Work-Related Injuries and Illnesses by the end of the next business day.

- We may choose to not record the employee's name on OSHA 300 Log of Work-Related Injuries and Illnesses in order to protect the privacy of injured and ill employees in certain privacy-concern cases.

- We are allowed to give an employee, former employee, or personal representative a copy of OSHA 301Form Injury and Illness Incident Report by End of the next business day.

  A personal representative is:

  - Any person that the employee or former employee designates as such, in writing; or

  The legal representative of a deceased or legally incapacitated employee or former employee.

- We are allowed to give authorized employee representatives under a collective bargaining agreement a copy of OSHA 301Form Injury and Illness Incident Report within seven (7) calendar days.

  An authorized employee representative is an authorized collective bargaining agent of employees. The authorized employee representative will be provided the OSHA 301 Incident Report section titled 'Tell us about the case.' The company will remove all other information from the copy of the OSHA 301 Incident Report or the equivalent substitute form that is given to the authorized employee representative.

  While the first copy is free, we may charge a reasonable amount for retrieving and copying additional copies.

- Employees also have access to OSHA 300-A Summary of Work-Related Injuries and Illnesses, which is posted on the Main Office bulletin board from February 1 of the year following the year covered by the records and kept in place until April 30 for a total of three (3) months.

Sierra Packaging and Converting, LLC does not discriminate against employees who request access to any records required by OSHA 29 CFR 1904 or otherwise exercise any rights afforded by the OSH Act.

Record Retention

The Safety Manager saves the following records for (5) years following the end of the calendar year that these records cover:

- OSHA 300 Log, the privacy case list (if one exists),
- the annual summary, and
- the OSHA 301 Incident Report forms.

During the storage period, The Safety Manager updates OSHA 300 Log of Work-Related Injuries and Illnesses to include any newly discovered recordable injuries or illnesses and any changes that have occurred in the classification of previously recorded injuries and illnesses. If our company changes ownership, [Safety Manager Name], President is responsible for transferring the OSHA 29 CFR 1904 records to the new owner.

Variances

If our company wishes to keep records in a different manner from that prescribed by OSHA 29 CFR 1904, we may submit a variance petition to the Assistant Secretary of Labor for Occupational Safety and Health, U.S. Department of Labor, Washington, DC 20210. Alternative recordkeeping systems can be approved for a variance if they collect the same information, meet the OSH Act, and do not interfere with administration of the Act. See OSHA 29 CFR 1904 for instructions in how to obtain a variance.

Reporting Fatalities and Hospitalizations

Within eight (8) hours after the death of any employee from a work-related incident or the inpatient hospitalization of three (3) or more or more employees as a result of a work-related incident, [Safety Manager Name], Safety Manager, is responsible for orally reporting the fatality and/or multiple hospitalization by telephone or in person to OSHA's Regional Office:

OSHA toll-free central telephone number

1-800-321-OSHA (1-800-321-6742)

The Safety Manager will provide the agency the following information:

- The establishment name;
- The location of the incident;
- The time of the incident;
- The number of fatalities or hospitalized employees;
- The names of any injured employees;
- Your contact person and his or her phone number; and
- A brief description of the incident.

Fatalities or multiple hospitalization incidents resulting from a motor vehicle accident or on a commercial or public transportation system do not require reporting. However, these injuries must be recorded on our injury and illness records if required.

Other Reporting

When an authorized government representative asks for the records we keep under OSHA 29 CFR 1904, Safety Manager provides copies of the records within four business hours of the request.

If we receive OSHA's annual survey form, the Safety Manager fills it out and sends it to OSHA or OSHA's designee, as stated on the survey form, within 30 calendar days, or by the date stated in the survey form, whichever is later. If our company receives a Survey of Occupational Injuries and Illnesses Form from the Bureau of Labor Statistics (BLS), or a BLS designee, the Safety Manager promptly completes the form and returns it following the instructions contained on the survey form.

Workers' Compensation Fraud

Sierra Packaging and Converting, LLC is committed to every employee who receives a legitimate, work-related injury or illness. However, if an employee attempt to file a fraudulent work comp claim for injury is suspected it will be turned over to the company's Workers' Compensation insurer and the state's Attorney General's Office for investigation. Workers' Compensation fraud is a serious crime and will be prosecuted to the fullest extent of the law. Fraud results in high Workers' Compensation insurance premiums and productivity interruption affecting the company's ability to remain competitive in the marketplace. This in turn affects all employee's job security and wages. All employees are encouraged to immediately report any suspected fraud to his/her supervisor. Complete confidentiality will be maintained.

STATE OF NEVADA
Department of Business and Industry
Division of Industrial Relations
Occupational Safety and Health Administration
4600 Kietzke Lane, Bldg. F-153
Reno, NV 89502
Phone: (775)824-4600 FAX: (775)688-1378

INVOICE/
ABATEMENT NOTICE REMINDER

Company Name: SIERRA PACKING & CONVERTING LLC
Inspection Site: 11005 Stead Blvd, Reno, NV 89506
Issuance Date: 09/10/2013

Summary of Penalties for Inspection Number 317224608

Citation 1, Serious	= $	**3825.00**
Citation 2, Other	= $	**0.00**
TOTAL PROPOSED PENALTIES	= $	**3825.00**

To avoid additional charges, please remit payment promptly to this District Office for the total amount of the uncontested penalties summarized above. Make your check or money order payable to: "DIR-OSHA". Please indicate the Inspection Number (indicated above) on the remittance.

OSHA does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist. If, however, payment is for portions uncontested, please note which items are being paid directly on this invoice and return it with your remittance.

In extraordinary cases where payment of a penalty places an extreme burden on the employer, the Administrative Assistant III should be contacted regarding an alternate method of payment. Otherwise, if payment is not received once your time to contest has lapsed and the assessed penalties are deemed a final order of the Occupational Safety and Health Review Board, OSHA will have no alternative but to refer this matter to our legal counsel.

In addition, for violations you do not contest, you should promptly notify the District Manager, by letter, that you have corrected the cited conditions by the abatement date set in the citation.

Chris C. Davis
District Manager Northern Nevada

9/6/13
Date

McDONALD·CARANO·WILSON[a]

Timothy E. Rowe, Esq.

Respond to: Reno Office

September 26, 2013

Via Facsimile and Courier
Chris C. Davis
District Manager Northern Nevada
Department of Business & Industry
Occupational Safety & Health Administration
4600 Kietzke Lane, Bldg. F-153
Reno, NV 89502
(Fax) 688-1378

NOTICE OF CONTEST

Re:	**Employer:**	**Sierra Packaging & Converting, LLC**
	Inspection Site:	**11005 Stead Blvd., Reno, NV 89506**
	Inspection Number:	**317224608**

Dear Mr. Davis:

Please be advised this firm represents Sierra Packaging & Converting, LLC ("Sierra Packaging") with respect to the above reference citation and penalty. Please consider this letter as Sierra Packaging's Notice of Contest for the Citation and Notification of Penalty issued on December 10, 2013.

Sierra Packaging intends to contest Citation 1, Item 1. A copy of the specific Citation and Notification of Penalty to be contested is attached for your reference. Sierra Packaging will contest the substance of the Citation, the characterization of the Citation as "serious" and the proposed penalty assessed.

Sierra Packaging would welcome the opportunity to discuss this Citation with your staff and legal counsel prior to proceeding with the hearing in this matter.

Sincerely,

Timothy E. Rowe

TER/sp
cc: Robert E. Yarhi
Stephen O'Day, Esq.
Neal Dorman, Esq.
Enclosure

100 WEST LIBERTY ST., 10TH FLOOR
RENO, NEVADA 89501
P.O. BOX 2670, RENO, NEVADA 89505
775-788-2000 • FAX 775-788-2020

ATTORNEYS AT LAW
www.mcdonaldcarano.com

2300 WEST SAHARA AVENUE
SUITE 1200
LAS VEGAS, NEVADA 89102
702-873-4100
FAX 702-873-9966

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

NEVADA OCCUPATIONAL SAFETY AND HEALTH
REVIEW BOARD

FILED
OCT - 8 2013
O S H REVIEW BOARD
BY

CHIEF ADMINISTRATIVE OFFICER OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION OF THE DIVISION OF INDUSTRIAL RELATIONS OF THE DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,
Complainant,
vs.
SIERRA PACKAGING & CONVERTING, LLC
Respondent.

DOCKET NO: RNO 14-1684

SUMMONS

THE STATE OF NEVADA SENDS GREETINGS TO THE ABOVE-NAMED RESPONDENT:

AN ADMINISTRATIVE COMPLAINT HAS BEEN FILED AGAINST YOU. YOU ARE **SUMMONED AND REQUIRED** to serve an **ANSWER** to the **COMPLAINT** accompanying this **SUMMONS.** This Answer should be filed within **FIFTEEN (15) days** from the date of mailing of this Summons, exclusive of the date of personal service. Service of the ANSWER must be made on both the Nevada Occupational Safety and Health Review Board **and** the Chief Administrative Officer of the Nevada Occupational Safety and Health Administration, whose addresses are:

Nevada Occupational Safety and Health Review Board c/o Fred Scarpello, Attorney at Law 600 E. William Street, Suite 300 Carson City, Nevada 89701	Division of Industrial Relations – Legal Section c/o Nancy Wong, Attorney at Law 400 West King Street, Suite 201 Carson City, Nevada 89703

IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

/S/
JOE ADAMS, Chairman
Nevada Occupational Safety and Health
Review Board

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COPY

NEVADA OCCUPATIONAL SAFETY AND HEALTH

REVIEW BOARD

FILED

OCT - 8 2013

O S H REVIEW BOARD

BY Kreston

CHIEF ADMINISTRATIVE OFFICER OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION OF THE DIVISION OF INDUSTRIAL RELATIONS OF THE DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,
Complainant,

vs.

SIERRA PACKAGING & CONVERTING, LLC
Respondent.

DOCKET NO: RNO 14-1684

COMPLAINT

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

As Complaint against the SIERRA PACKAGING & CONVERTING, LLC, the Chief Administrative Officer of the Occupational Safety and Health Administration of the Division of Industrial Relations of the Department of Business and Industry, State of Nevada ("Complainant"), alleges:

1. At all times mentioned, the Complainant has served as the Chief Administrative Officer of the Occupational Safety and Health Administration of the Division of Industrial Relations ("Division"), of the State of Nevada.

2. SIERRA PACKAGING & COVERTING, LLC, ("Respondent") is a Nevada limited liability company domiciled with a business and mailing address at 11005 Stead Blvd., Reno, Nevada 89506. Respondent conducted business and maintained a place of employment, as defined by NRS 618.155, at 11005 Stead Blvd., Reno, Nevada 89506.

3. Pursuant to NRS 618.315, jurisdiction has been conferred upon the Division over the working conditions at Respondent's place of employment, as mentioned above.

4. Respondent's activities are defined in the Standard Industrial Classification Manual as Commercial Printing, Not Elsewhere Classified (Standard Industrial Classification Code No. 2759.)

///

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

5. On September 10, 2013, the Complainant issued Citation and Notification of Penalty, Inspection Number 317224608, JC-009-14, pursuant to NRS 618.375 as a result of code violations discovered at the Respondent's place of employment, as mentioned above. A copy of said Citation and Notification of Penalty is attached to this Complaint as Exhibit "A" and incorporated herein by reference.

6. By contest letter dated and received by Nevada OSHA on September 26, 2013, which has been designated Exhibit "B" and incorporated herein by reference, the Respondent contested Citation 1, Item 1, of the referenced Citations and Notification of Penalty. Respondent did not contest Citation 2, Item 1, and, as a result, no other allegations are made in this complaint regarding Citation 2, Item 1.

7. The Complainant classified the violation set forth in Citation 1, Item 1, as a "SERIOUS" violation, as follows:

> **Citation 1, Item 1:** SERIOUS
> 29 CFR 1910.132(f)(1)(iv): The employer shall provide training to each employee who is required by this section to use personal protective equipment (PPE). Each such employee shall be trained to know the limitations of the PPE:
>
> Facility; employees used a fall arrest system consisting of a five point body harness, six foot lanyard with a three foot shock pack to access the top tier racking located 15 feet, 7 inches high. The lack of knowledge of the minimum required distance from a suitable anchorage point to ground exposed user to an unarrested fall of 15 feet, 7 inches.

Date By Which Violation Must Be Abated: 10/13/13.

8. The Complainant by the above-mentioned Citation 1, Item 1, classified as "SERIOUS," and Notification of Penalty, proposed the fine of THREE THOUSAND, EIGHT HUNDRED TWENTY-FIVE DOLLARS ($3,825) giving due consideration to the probability, severity and extent of the violation, the employer's history of previous violations, and the employer's size and good faith.

WHEREFORE, the Complaint prays for an Order of the Review Board against the Respondent declaring that:

///

1. The Respondent be found in "SERIOUS" violation of the standards set forth in the above-mentioned Citation 1, Item 1;

2. The proposed penalty of THREE THOUSAND, EIGHT HUNDRED TWENTY-FIVE DOLLARS ($3,825) for Citation 1, Item 1 be affirmed; and

3. For such other and further relief as the Review Board may deem just and proper in the premises.

DATED this 8 day of October, 2013.

Nevada Occupational Safety and Health Administration

NANCY E. WONG, Division Counsel
Division of Industrial Relations
400 West King Street, Suite 201
Carson City, Nevada 89703
(775) 684-7286

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of the State of Nevada, Department of Business and Industry, Division of Industrial Relations (DIR), and that on this date, I caused to be served a true and correct copy of the **SUMMONS and COMPLAINT, OSHA docket #RNO 14-1684** by the method indicated below, and addressed to the following:

Person(s) Served:
TIMOTHY ROWE ESQ
MCDONALD CARANO WILSON
100 WEST LIBERTY ST 10TH FLOOR
RENO NV 89501
(certified mail 7010 1870 0000 2210 4612)

U.S. Mail
✓ via State Mail room (regular or certified) circle one
____ deposited directly with U.S. Mail Service
____ Overnight Mail
____ Interdepartmental Mail
____ Messenger Service
____ Facsimile fax number: _____

Person(s) Served:
CHRIS DAVIS
DIR – OSHA
4600 KIETZKE LANE BLDG F-153
RENO NV 89502

U.S. Mail
____ via State Mail room (regular or certified) circle one
____ deposited directly with U.S. Mail Service
____ Overnight Mail
✓ Interdepartmental Mail
____ Messenger Service
____ Facsimile fax number: _____

Person(s) Served:
NV OCCUPATIONAL SAFETY AND HEALTH REVIEW BOARD
C/O FRED SCARPELLO ESQ
600 E WILLIAM ST STE 300
CARSON CITY NV 89701

U.S. Mail
____ via State Mail room (regular or certified) circle one
____ deposited directly with U.S. Mail Service
____ Overnight Mail
____ Interdepartmental Mail
✓ Messenger Service
____ Facsimile fax number: _____

DATED this 8th day of October, 2013

Barbara Takeda, Legal Secretary

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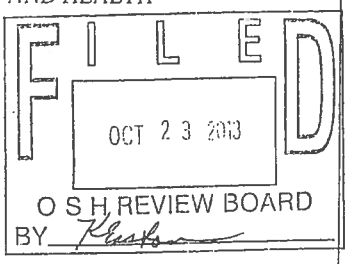
NEVADA OCCUPATIONAL SAFETY AND HEALTH

REVIEW BOARD



CHIEF ADMINISTRATIVE OFFICER OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION OF THE DIVISION OF INDUSTRIAL RELATIONS OF THE DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,
Complainant,

vs.

SIERRA PACKAGING & CONVERTING, LLC
Respondent.
_____/

DOCKET NO.: RNO 14-1684

ANSWER

COMES NOW, SIERRA PACKAGING & CONVERTING, LLC, ("SIERRA PACKAGING") and in answer to the Complaint of the Chief Administrative Officer of the Occupational Safety and Health Administration of the Division of Industrial Relations of the Department of Business and Industry, State of Nevada, ("OSHA"), admits, denies and alleges as follows:

1. SIERRA PACKAGING admits the allegations contained in Paragraph 1 of the Complaint.

2. SIERRA PACKAGING admits the allegations contained in Paragraph 2 of the Complaint.

3. SIERRA PACKAGING admits the allegations contained in Paragraph 3 of the Complaint.

4. SIERRA PACKAGING is without sufficient information to form a belief as to the truth of the allegations contained in Paragraph 4 of the Complaint and therefore denies the same.

5. With respect to Paragraph 5, SIERRA PACKAGING admits that a Citation was issued. It denies all remaining allegations contained in Paragraph 5 of the Complaint.

6. SIERRA PACKAGING admits the allegations contained in Paragraph 6 of the Complaint.

McDONALD·CARANO·WILSON
100 WEST LIBERTY STREET, 10TH FLOOR • RENO, NEVADA 89501
P.O. BOX 2670 • RENO, NEVADA 89505-2670
PHONE 775-788-2000 • FAX 775-786-2020

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DIR LEGAL
CARSON CITY OFFICE

7. SIERRA PACKAGING admits that OSHA classified the violation as "serious". SIERRA PACKAGING denies that a violation occurred or that the violation was "serious".

8. SIERRA PACKAGING admits OSHA proposed a fine of Three Thousand Eight Hundred and Twenty-Five Dollars and no/100 cents ($3,825.00). SIERRA PACKAGING denies the fine is appropriate given the probability, severity and extent of the alleged violation and the employer's history, size and good faith.

AFFIRMATIVE DEFENSES

By way of affirmative defense, SIERRA PACKAGING alleges as follows:

1. The Complaint fails to state an actionable violation of law upon which relief can be granted.

2. SIERRA PACKAGING was not required to provide training for personal protective equipment under the circumstances alleged here because there was no recognized hazard present or likely to be present at SIERRA PACKAGING's Stead facility.

3. There was no actionable violation of law under the circumstances of this case because the underlying violation which led to the Citation was the result of an isolated event and/or or unpreventable employee misconduct.

WHEREFORE, SIERRA PACKAGING prays for an Order of the Review Board declaring that:

1 SIERRA PACKAGING is not in violation of the standards set forth in Citation 1, Item 1;

2. The proposed penalty of Three Thousand Eight Hundred and Twenty-Five and no/100 Dollars ($3,825.00) for Citation 1, Item 1 be denied;

3. The above entitled Complaint be dismissed with prejudice, and;

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///

McDONALD·CARANO·WILSON
100 WEST LIBERTY STREET, 10TH FLOOR • RENO, NEVADA 89501
P.O. BOX 2670 • RENO, NEVADA 89505-2670
PHONE 775-788-2000 • FAX 775-788-2020

4. For such other and further relief as the Review Board deems appropriate.

Dated this 23rd day of October 2013.

MCDONALD CARANO WILSON LLP

By: _____

Timothy E. Rowe, Esq. (NSB#1000)
100 W. Liberty Street, 10th Floor
P.O. Box 2670
Reno, Nevada 89505
Telephone: (775) 788-2000
Facsimile: (775) 788-2020
Attorneys For Sierra Packaging, LLC

McDONALD·CARANO·WILSON
100 WEST LIBERTY STREET, 10TH FLOOR • RENO, NEVADA 89501
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378407

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CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b), I hereby certify that I am an employee of McDONALD CARANO WILSON LLP, and that on October 23rd, 2013, a true and correct copy of the foregoing **ANSWER** was served via courier on the following parties:

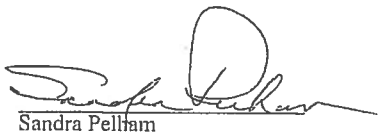
Nevada Occupational Safety and Health Review Board
c/o Fred Scarpello, Attorney at Law
600 E. William St., Suite 300
Carson City, NV 89701

Division of Industrial Relations
c/o Nancy Wong, Attorney at Law
Legal Section
400 West King St., Suite 201
Carson City, NV 89703

Chris Davis
Director – OSHA
4600 Kietzke Lane Bldg F-153
Reno, NV 89502

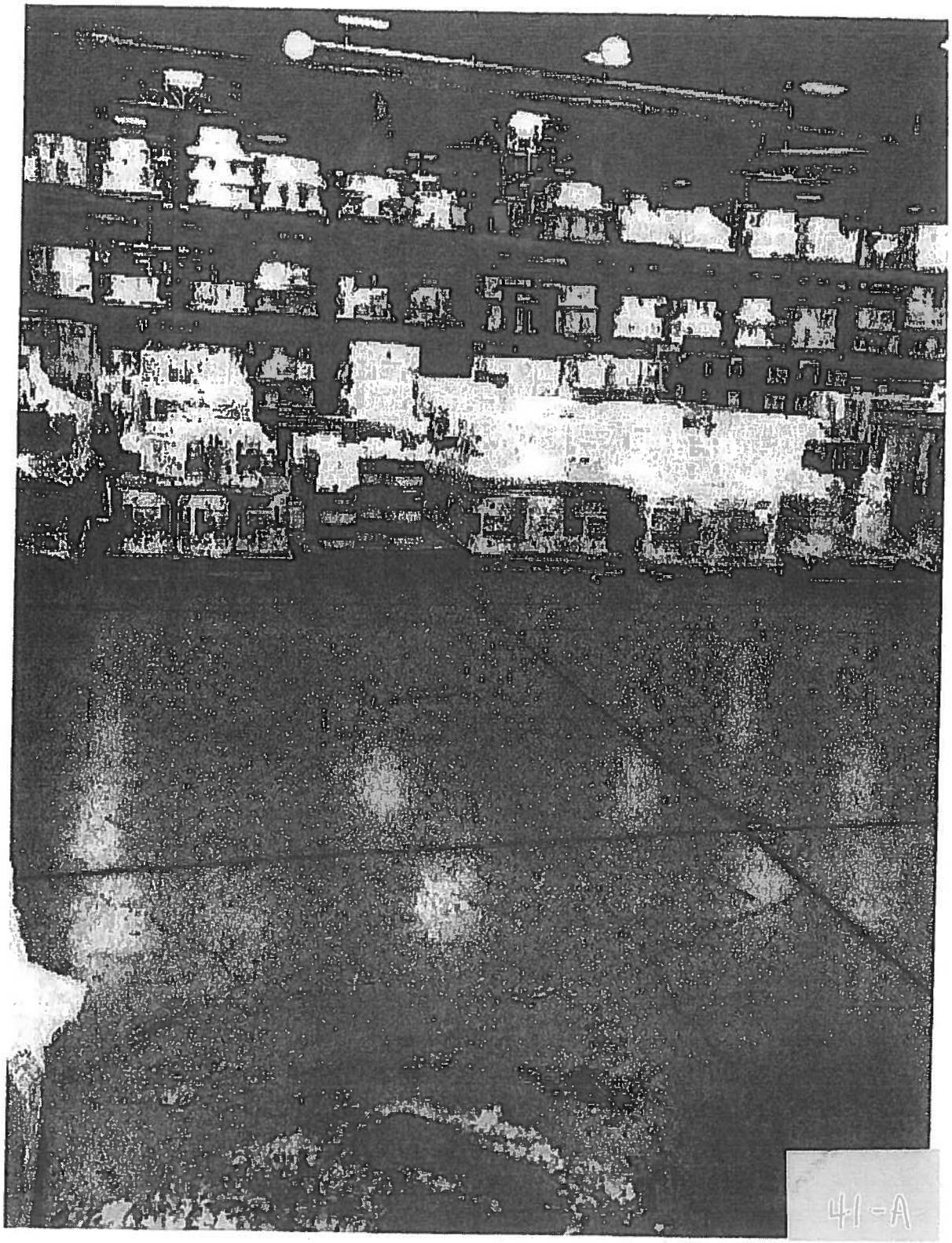
On the same date a copy was sent via email to the following party:

Stephen E. O'Day, Esq.
Smith, Gambrell & Russell LLP
Suite 3100
1230 Peachtree St.
Atlanta, GA 30309
soday@sgrlaw.com



Sandra Pelham

378407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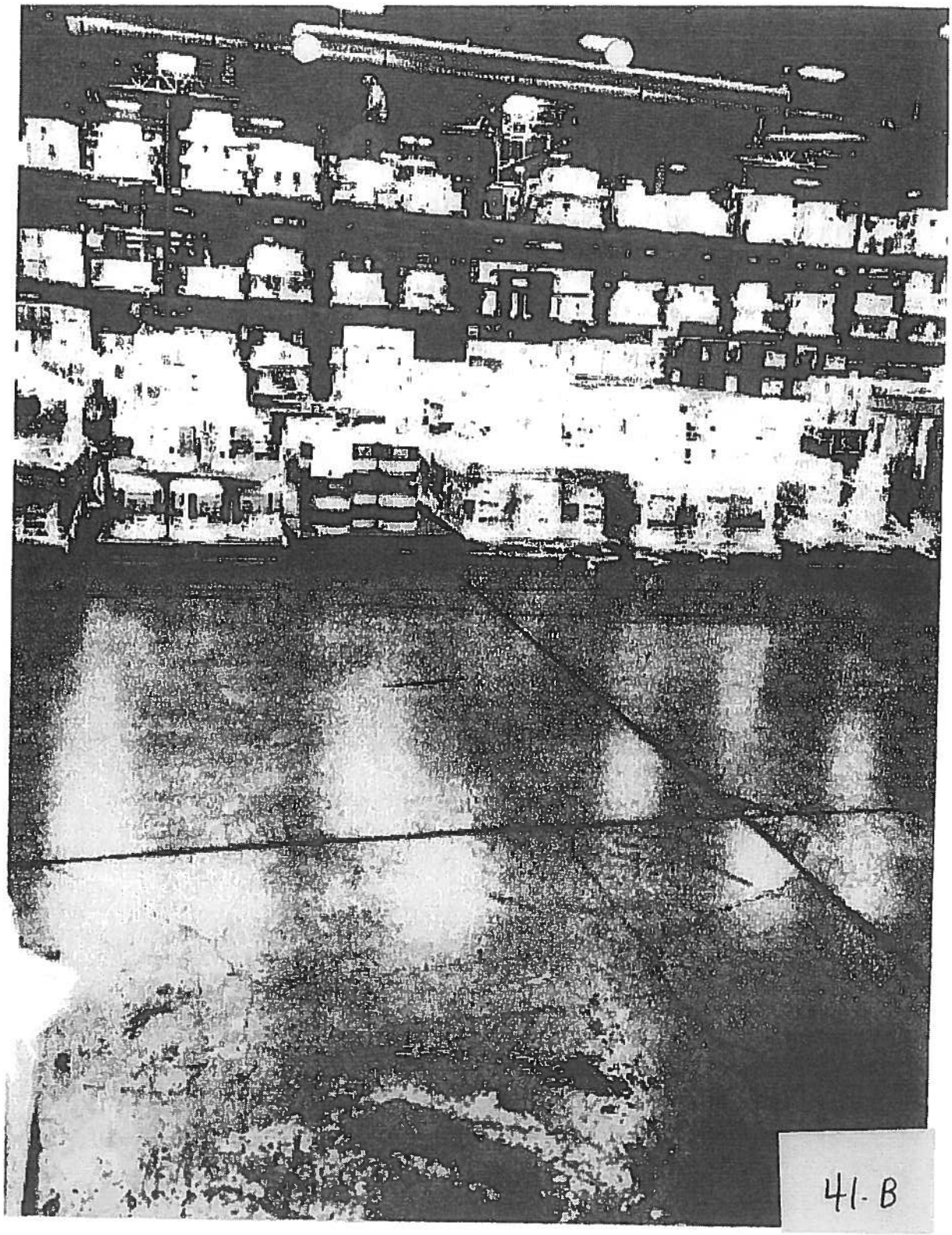
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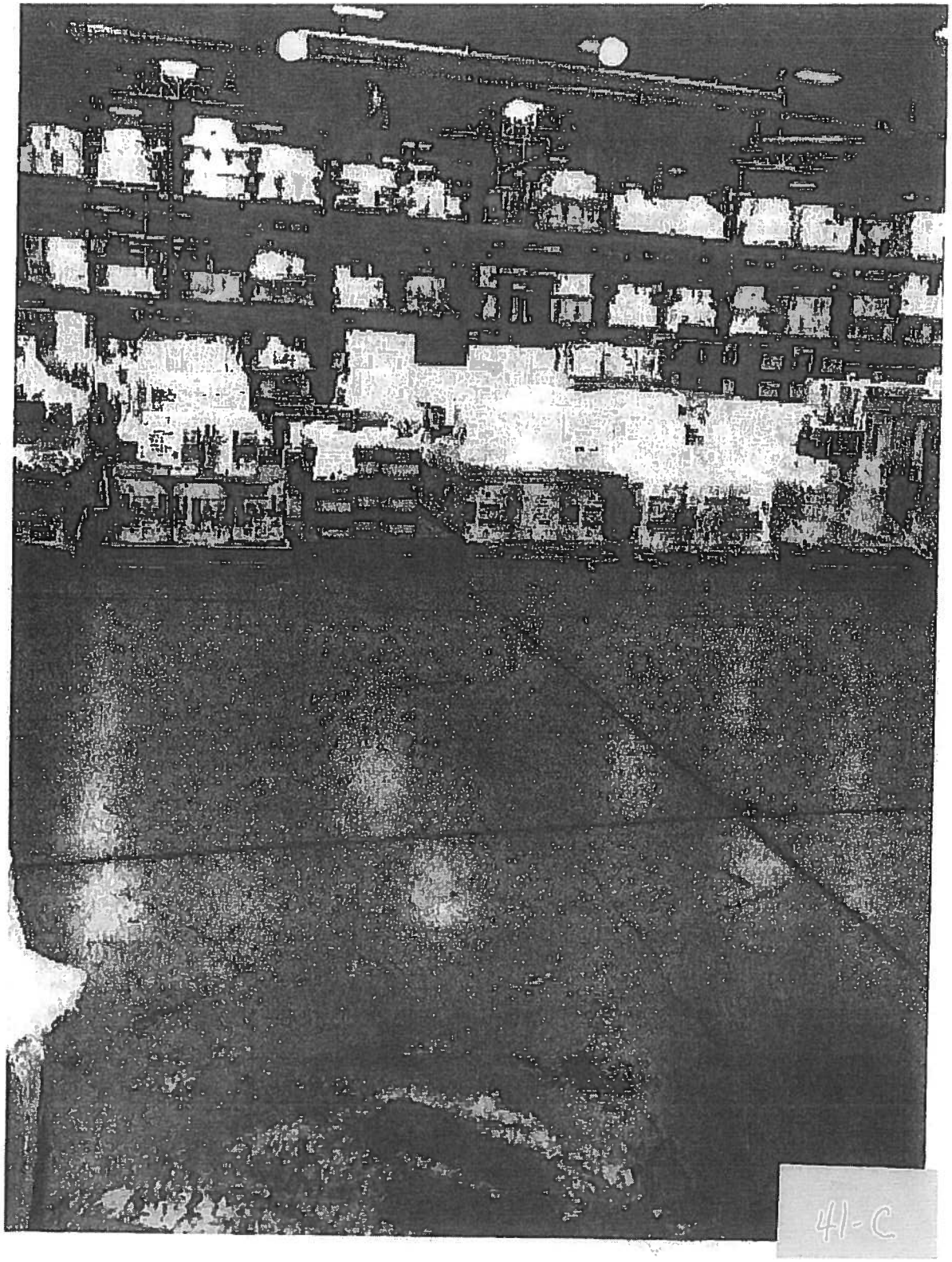
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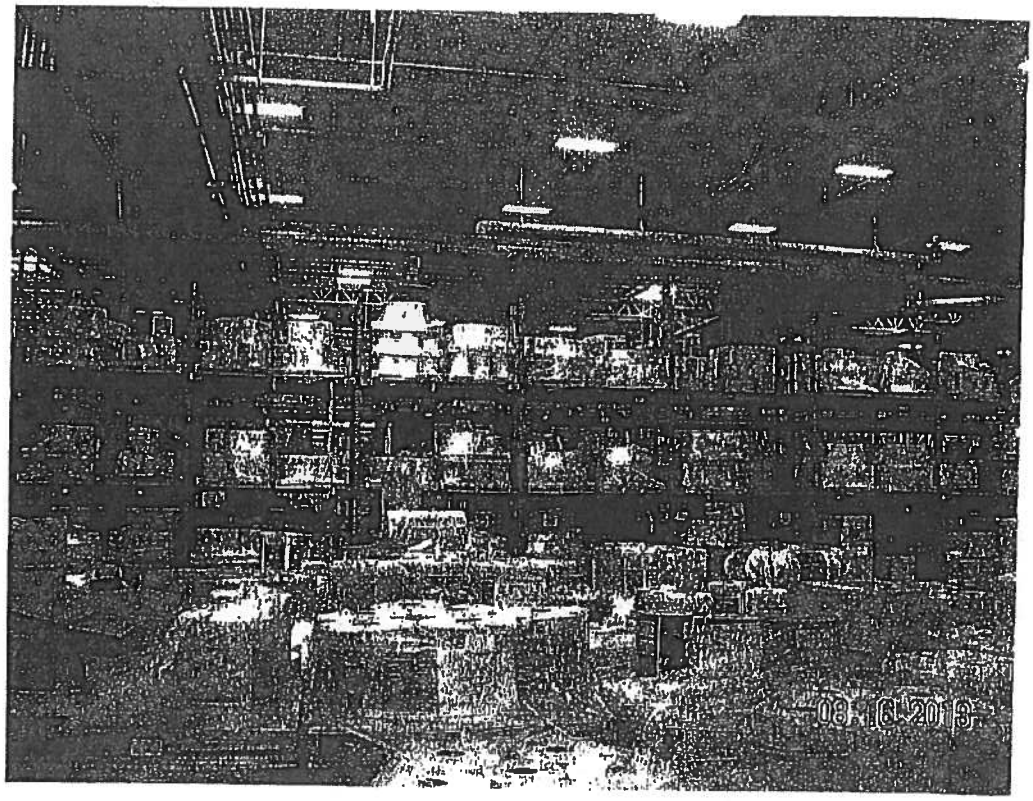
SIERRA PACKING & CONVERTING, LLC.
Inspection No. 317224608 Opt. No. JC-009-14

Serious Citation 01 001
Reference: 29 CFR 1910.132 (d) (1)



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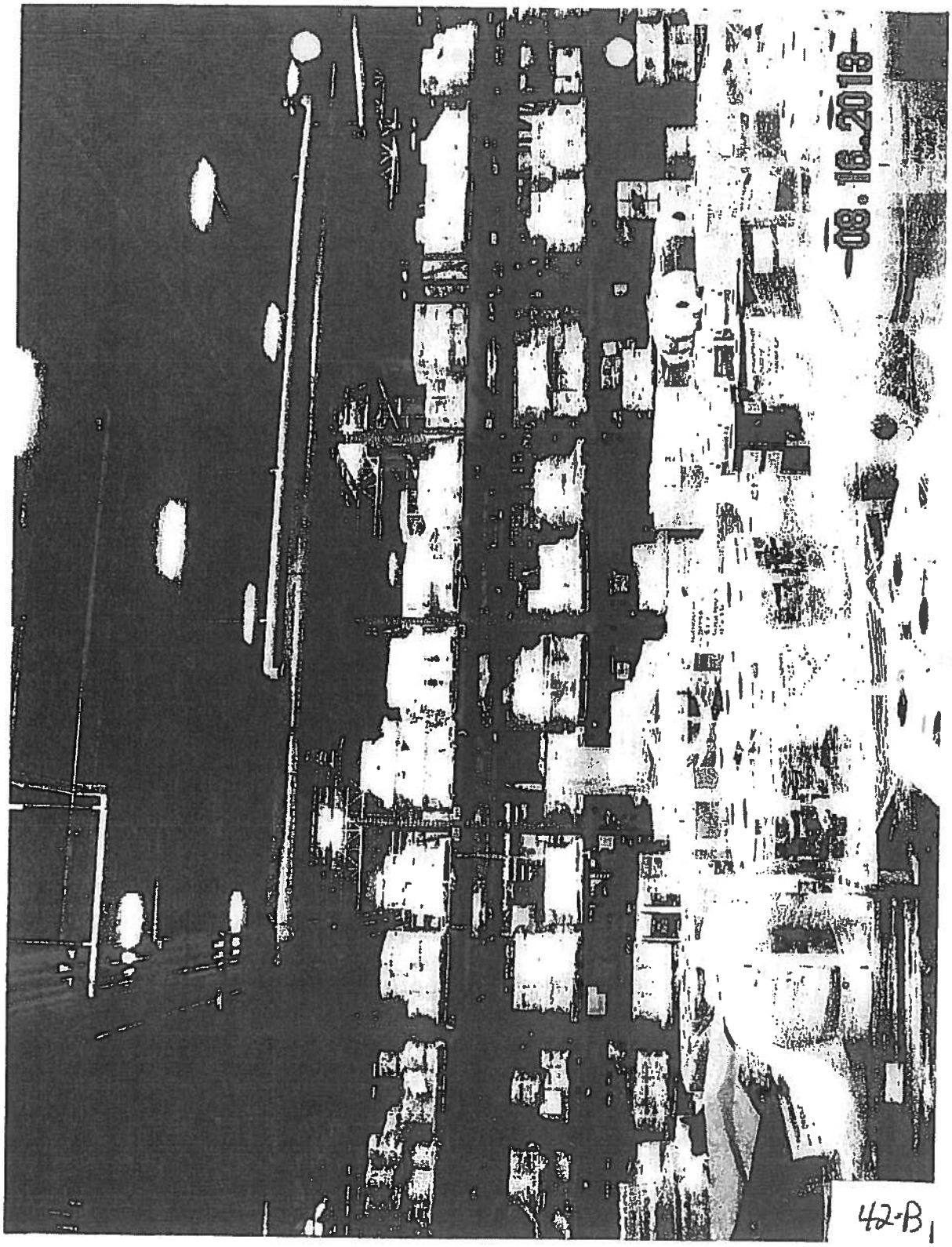
August 16, 2013
Date Taken

CSHO Jennifer F. Cox

42-A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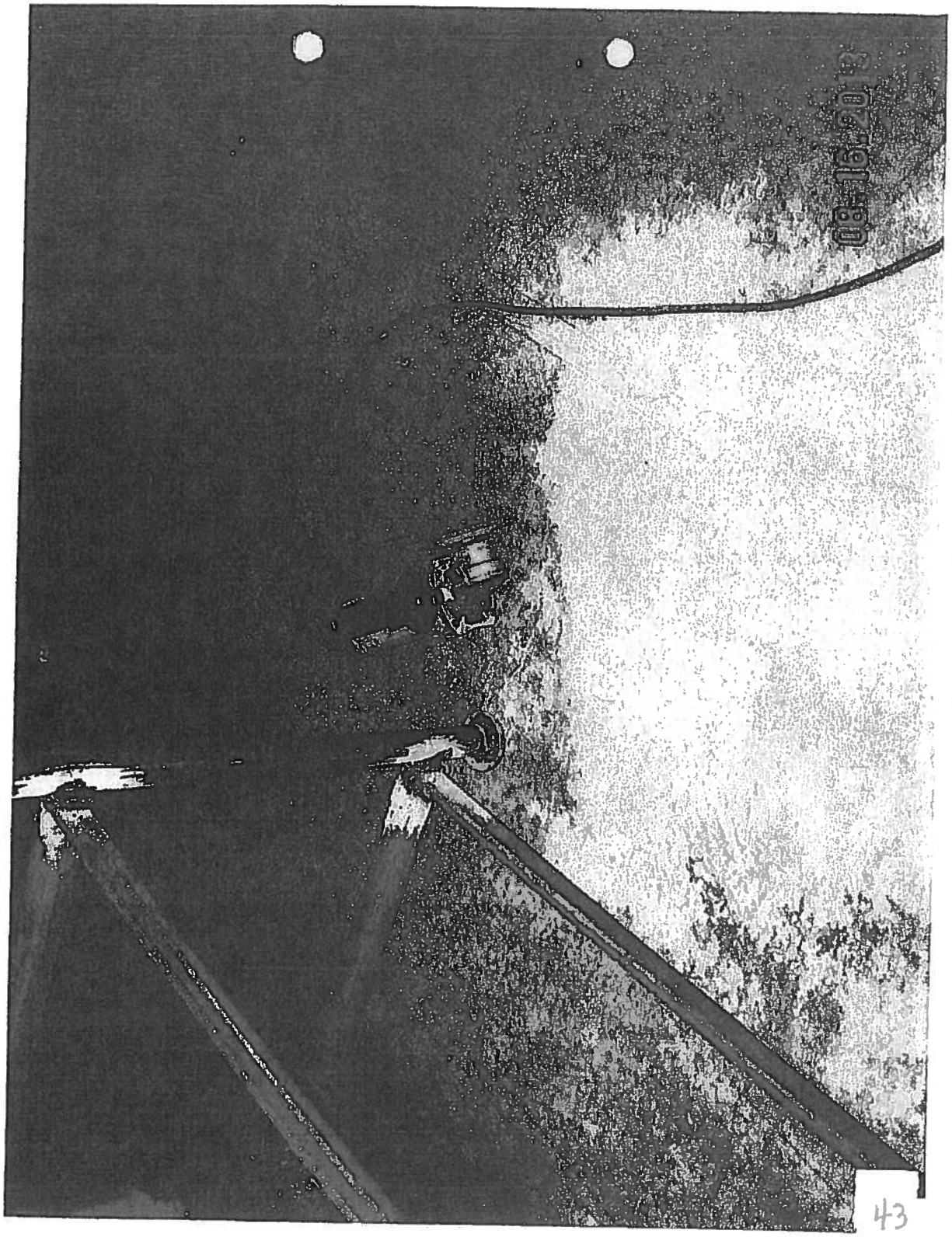
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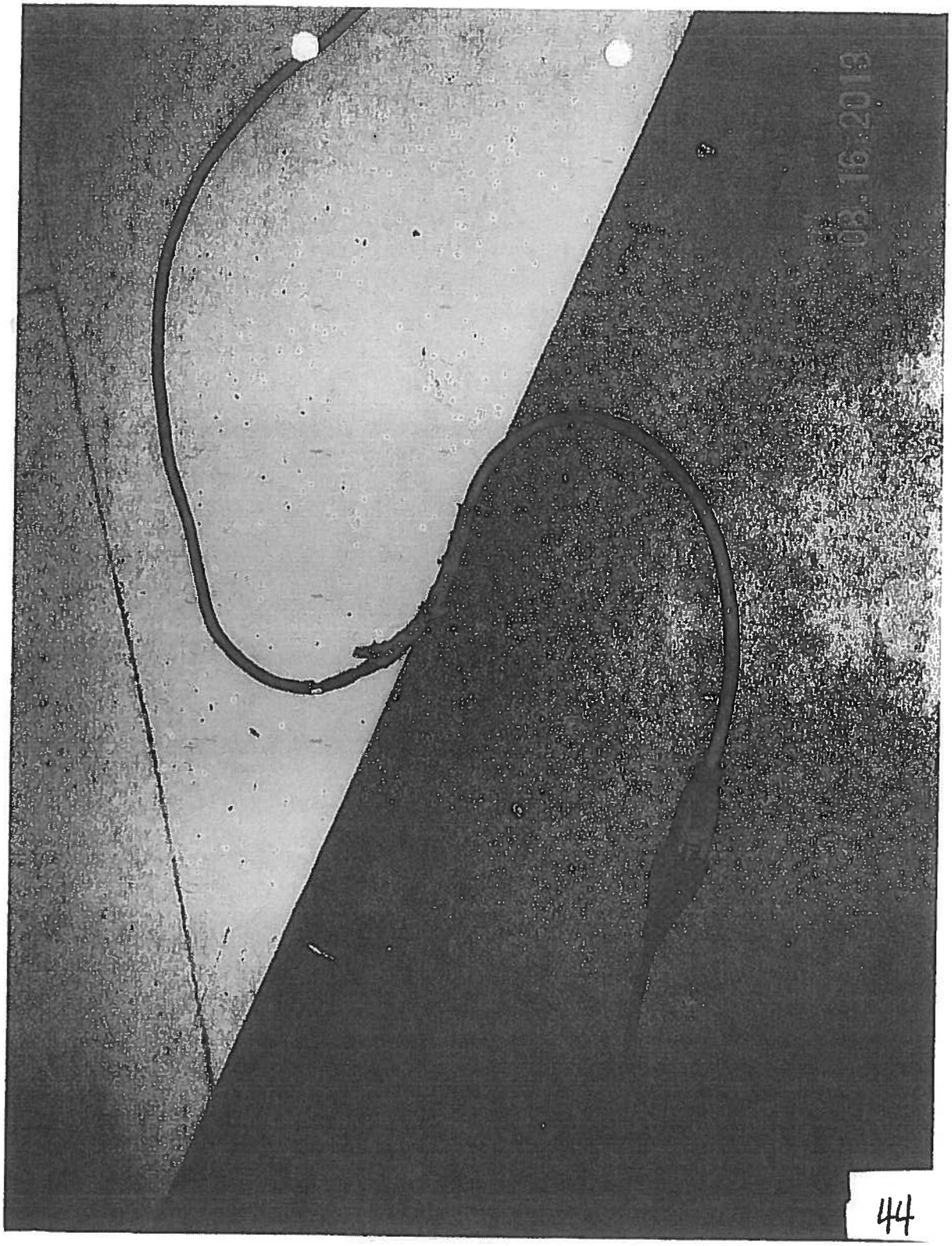
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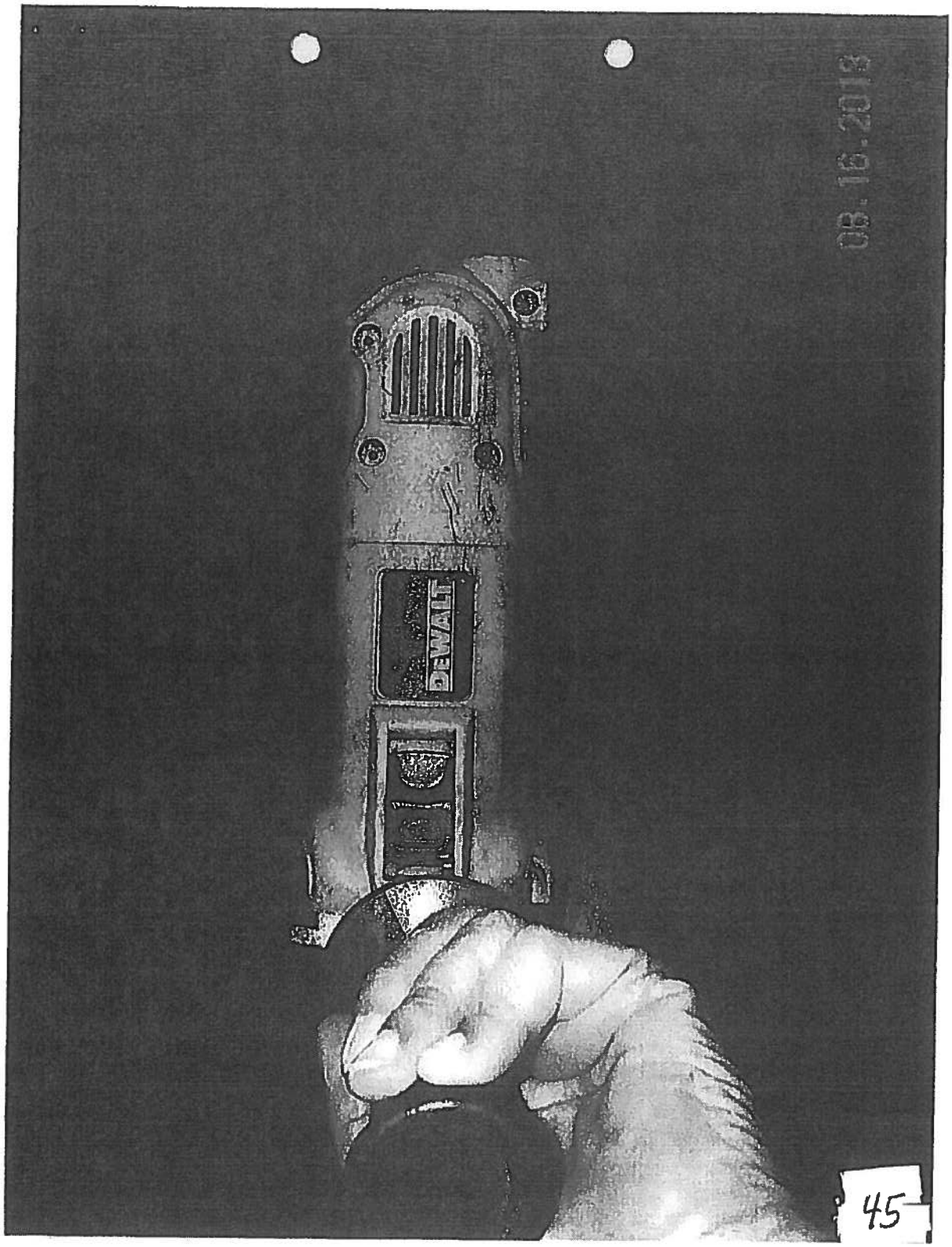
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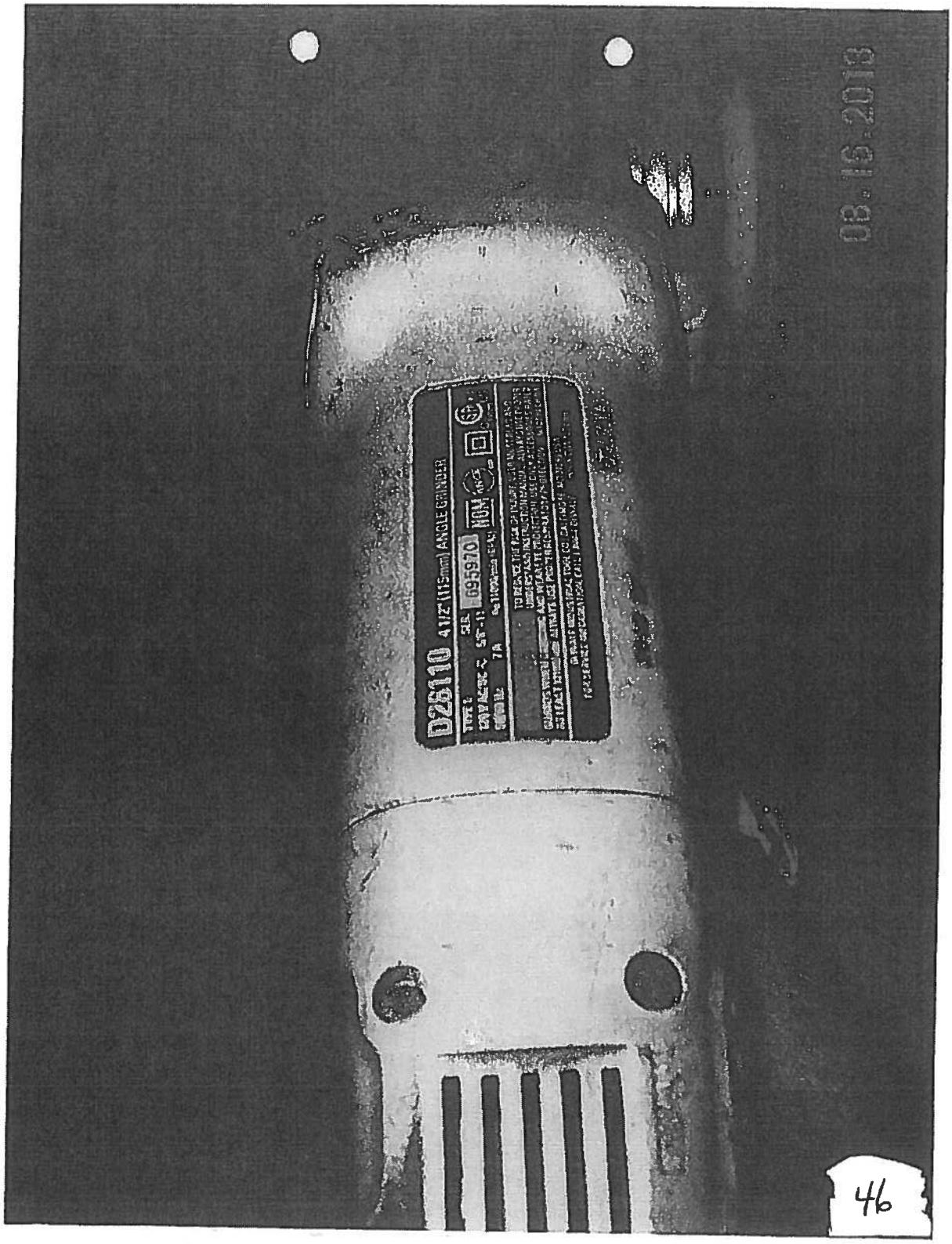
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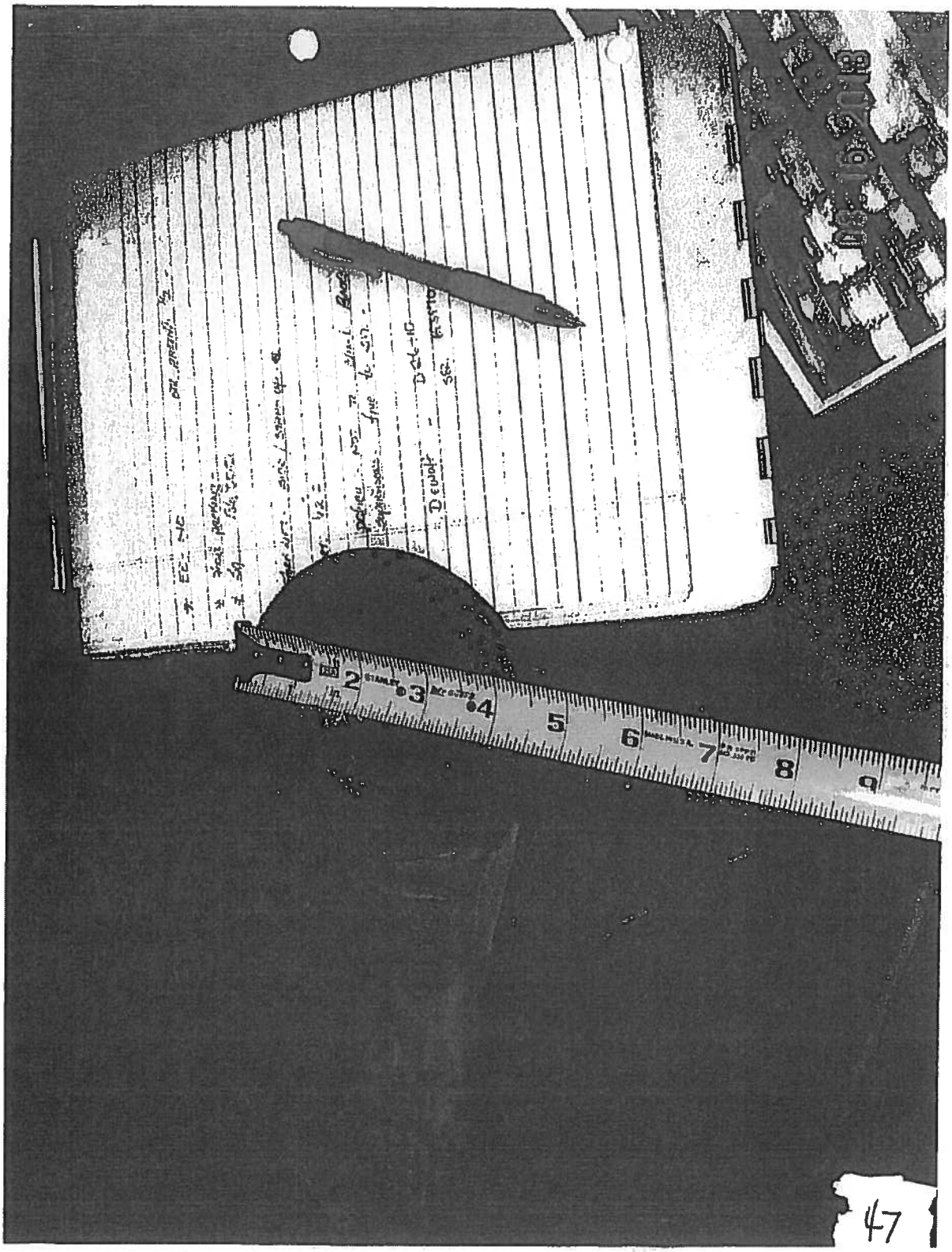
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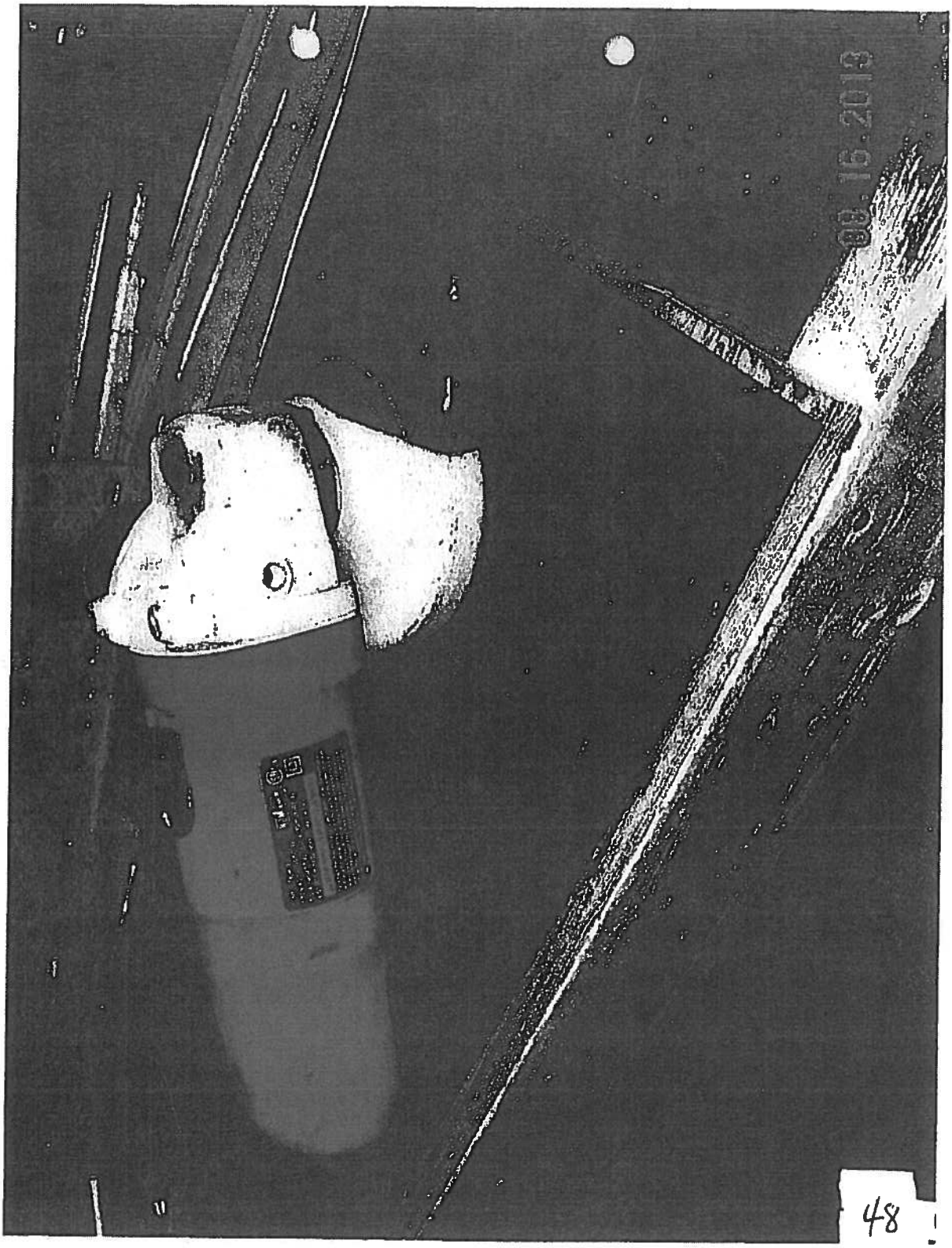
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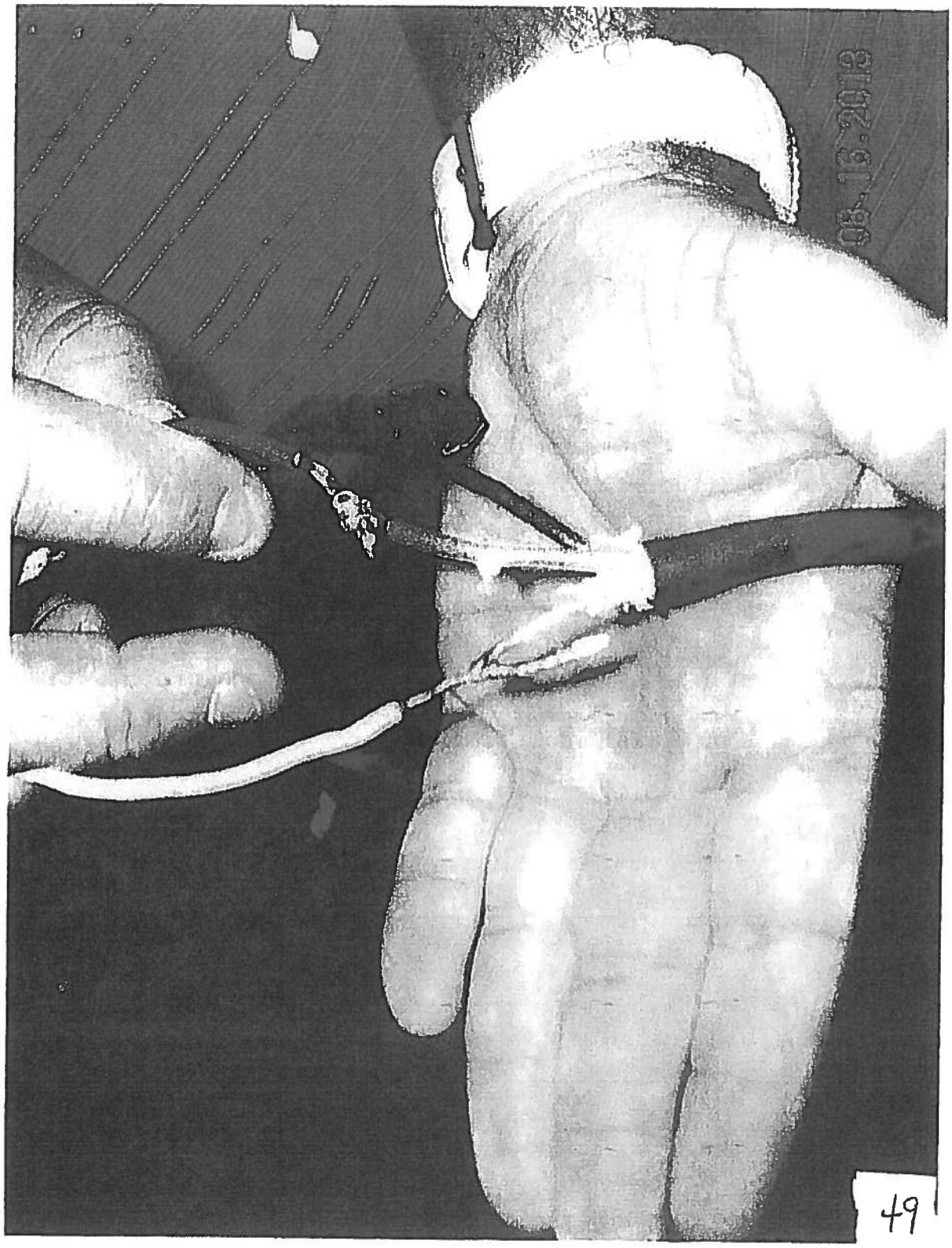
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49

OK
Translation complete

Sierra Packaging and Converting, LLC

Employee Safety Handbook

Origination Date:	April 3, 2009	Revision Date:	
Release Authorized by:	Otis Wilson		
Title:	Safety Manager		

A

Employee Safety Handbook

General Health & Safety Policies

Sierra Packaging and Converting, LLC's policy is that all employees be provided with a safe and healthful place of employment. Identification of hazardous conditions may be accomplished at the planning and design stage, as a result of workplace inspections, or by employee reports. All recognized safety and health hazards shall be eliminated or controlled as quickly as possible; subject to priorities based upon the degree of risk posed by the hazards. The preferred method of hazard abatement shall be through application of engineering controls or substitution of less hazardous processes or materials. Total reliance on personal protective equipment is acceptable only when all other methods are proven to be technically and/or economically infeasible.

Safety Rules have been developed with input from Supervision and Employees. While held to a minimum, the rules address behaviors and work practices that can lead to accidents and injuries. Each Employee should become familiar with and follow General and Departmental Safety Rules. Supervisors must enforce Safe Work practices through strict adherence to Safety Rules. Most accidents can be prevented if everyone uses assigned safety equipment and follows the established safety rules. To operate a safe and successful business, we must work as a team to

THINK SAFE, WORK SAFE, AND BE SAFE.

Why Work Safely?

- Work safely for the most important people in your life, your family.
- If you are injured at work the people you will directly affect the most will be your family.
- A work related injury could cause you to be unable to play with your children, take part in recreational activities or hobbies.

What is working safely?

- Wearing required PPE such as safety glasses.
- Completing every task the correct way, not taking hazardous shortcuts.
- Paying attention to the task at hand.

– Asking your supervisor how to complete unfamiliar tasks.

Your Safety Rights

You have several important rights concerning safety, which are protected by federal, state and local laws that you should be aware of. They are:

- The right to a safe work-place free from recognized hazards
- The right to request information on safety and health hazards in the workplace, precautions that may be taken, and procedures to be followed if an employee is injured or exposed to toxic substances.
- The right to know about the hazards associated with the chemicals you work with, and the safety procedures you need to follow to protect yourself from those hazards.
- The right to question any instruction which requires you to disobey a safety rule, which puts yourself or someone else in unnecessary danger of serious injury, or requires you to perform a task for which you have not been trained to safely perform.
- The right to access your medical and exposure records.
- The right of freedom from retaliation for demanding your safety rights.

Your Safety Responsibilities

You also have some important responsibilities concerning safety. These are:

- The responsibility of reporting all injuries and illnesses to your supervisor, no matter how small.
- The responsibility of always following the safety rules for every task you perform,
- The responsibility of reporting any hazards you see.
- The responsibility of helping your co-workers recognize unsafe actions or conditions they cause.
- The responsibility of asking about the safety rules you are not sure about.

Employee Safety Rules

It is impossible to list or include all safety rules for all the possible tasks you may have to do. But the following rules have been prepared to help you avoid hazards, which may cause injury while doing some of the more common tasks you may be asked to do. You should study and follow the rules provided in this booklet, and to ask your supervisor for additional rules when asked to do a task you are not familiar with, and this booklet does not cover.

Failure to follow safety rules and /or safe practices will result in disciplinary action, up to and including termination.

General Safety Rules

- Read and follow the safety notices and other information that is posted.
- Observe and follow all safety instructions, signs, and operation procedures.
- Help your fellow employee when they ask for assistance or when needed for their safety.
- Never participate in "horseplay". Horseplay that results in injury is often not covered by Workers' Compensation.
- Clean up spills immediately.
- Report all unsafe conditions, hazards, or equipment immediately. Make sure other people are warned of the problem so that they may avoid it.
- Wear personal protective equipment as required to reduce injury potential. Use gloves, safety glasses, back support belts, etc., as necessary.
- Never stand on chairs, furniture, or anything other than an approved ladder or step stool.
- Never use intoxicating beverages or controlled drugs before or during work. Prescription medication should only be used at work with your Doctor's approval.

Access to Employee Exposure & Medical Records

Whenever an employee or designated representative requests access to a record, Sierra Packaging and Converting, LLC will assure that access is provided in a reasonable time, place, and manner. If Sierra Packaging and Converting, LLC cannot reasonably provide access to the record within fifteen (15) working days, the company will within the fifteen (15) working days apprise the employee or designated representative requesting the record of the reason for the delay and the earliest date when the record can be made available. Employee exposure and medical records can be obtained by contacting Otis Wilson, Safety Manager.

Bloodborne Pathogens

Unless your have received proper bloodborne pathogen training and have at least been offered the Hepatitis B vaccination series, DO NOT touch any blood or other body fluid or material contaminated with these fluids. If you accidentally come in contact with another person's blood or body fluid immediately notify your supervisor so that you can be medically evaluated by a physician for possible exposure to bloodborne pathogens.

Injuries & Accidents

- All injuries and accidents must be reported to your supervisor immediately. This includes first aid injuries and close calls.
- First Aid injuries must be documented on the first aid log.
- Accidents and injuries resulting in medical treatment must be documented on an accident investigation form.
- Not reporting an injury or accident immediately will result in disciplinary action.
- Failure to report work related injuries and illnesses in a timely manner might result in the denial of benefits under the workers' compensation law.

Workers' Compensation Fraud

Sierra Packaging and Converting, LLC is committed to every employee who receives a legitimate, work-related injury or illness. However, if an employee attempt to file a fraudulent work comp claim for injury is suspected it will be turned over to the company's Workers' Compensation insurer and the State Attorney General's Office for investigation. Workers' Compensation Fraud is a very serious crime and will be prosecuted to the fullest extent of the law. Fraud results in high Workers' Compensation insurance premiums and productivity interruption affecting the company's ability to remain competitive in the marketplace. This in turn affects all employee's job security and wages. All employees are encouraged to immediately report any suspected fraud to his/her supervisor. Complete confidentiality will be maintained.

Horse Play

Horse Play, scuffling, pranks, wrestling, or throwing material at others are not allowed under any circumstances. This type of behavior often results in injuries.

Disciplinary Action

Disregarding safety rules or established safety practices will result in immediate dismissal or at least being written up and suspended. Examples of violations:

- Not wearing required PPE
- Not immediately reporting an injury or damage
- Committing an unsafe act such as removing a guard

- Operating a piece of equipment you are not authorized to operate such as forklift

Return to Work Policy

All injured employees that are returned to work with restrictions will be accommodated with a modified duty position until they can return to full capacity. Every effort will be made to return employees on medical restrictions to their normal position with modifications to meet the required medical restrictions. When it is not possible to accommodate employees at their normal position an alternative task, within the scope of the restrictions will be assigned.

Drug & Alcohol Testing

The company alcohol and drug testing program is intended to eliminate the use of illegal drugs, alcohol, and other controlled substances in the work place. Designed solely for the benefit of our employees, this program will provide reasonable safety on the job and protection from offending individuals.

Drugs and alcohol tests will be administered under the following conditions:

- To any employee when there is reasonable suspicion that he/she is under the influence of illegal drugs or alcohol
- To any employee who is involved in a workplace accident which causes property damage or which requires examination and/or treatment by a licensed physician or medical facility
- Upon application for employment and as a condition of employment

Refusing a Drug and/or Alcohol Test

An employee's refusal to submit to testing as stated above shall be grounds for immediate discharge.

OSHA'S Hazard Communication Standard

- All chemicals must be labeled with the name of the chemical & manufacturer
- Bulk chemicals and chemicals with a hazard must be labeled with the Hazard

Management Information System Label shown on the next page.
- The higher the number rating the more hazardous the chemical.
- A list of hazardous materials used in the workplace is kept in the Safety Manager's office if you ever need to access it.
- Always use required and recommended PPE when working with any chemical.

Specific Hazards

The marking in the bottom white square

- OXY - Oxidizer (causes fire through release of oxygen)
- ACID - Acid
- ALK – Alkali
- CORR - Corrosive (both CORR & ALK material create burns on human skin)
- W - Use No Water
- Radiation Hazard

Material Safety Data Sheet (MSDS)

- MSDS = Material Safety Data Sheets
- In-depth information on health hazards, reactivity, flammability chemical properties, guidelines on usage and storage.
- The MSDSs are located in the Safety Manager's office. Anytime you need an MSDS just ask your supervisor and he or she will get it for you.

Required PPE

- Your supervisor will inform you of the PPE required to perform your specific job safely. Safety Glasses are required to be worn at all times.
- Face shield and gloves are required when working with corrosives.
- Proper eye, face and hand protection must always be worn when operating a welder or cutting torch.
- Face shield, safety glasses, gloves and hearing protection is required for all grinding activities.
- Gloves are required to be worn when handling materials that might result in injury to the hand(s).
- If an injury is sustained due to failure to wear required PPE, benefits and/or compensation that may be due you under Builder's Insurance Company will be reduced to the minimum required by law, including forfeiture of benefits and/or compensation.

Care of PPE

- Inspect all PPE prior to using each time.
- If any part of your PPE is damaged see your supervisor for a replacement
- Store all PPE in a clean, dry and secure place.
- If your PPE is lost or stolen you will charged for a replacement.

Limitations of PPE

- Dust, airborne dirt, and sparks can travel underneath and around the lens of safety glasses.
- Leather gloves can be cut through.

Eye Safety

- Never rub your face or eyes with dirty hand or while wearing a glove.
- If you get something in your eye never rub it with your finger, this will only make it worse.
- If something is in your eye blink it several times then use an eye wash.

Lock Out Tag Out: Control of Hazardous Energy

- If you ever see a red lock, yellow lock or a danger tag on a machine it is locked out for repairs.
- Never try to start a locked out machine.
- Never remove locks or tags.
- All machines being serviced must be locked out.
- Only trained and authorized maintenance employees can lock a machine out.

Electrical Safety

- Only trained maintenance employees are authorized to conduct trouble shooting or electrical repairs.
- Do not attempt any maintenance activities you are not trained or authorized to conduct.
- Never use a damaged extension cord or any other piece of damaged equipment.
- Never used electrical equipment in damp or wet areas.

Forklifts

- Only licensed and certified operators are authorized to operate forklifts.
- Do not operate mobile equipment until you pass the required training and are certified.
- Never stand on raised forks or on a pallet on the forklift.
- Never place any body part under raised forks, pallet or other load.
- Always keep a buffer distance of at least 6 feet from all directions of possible travel.
- Always insure the lift operator knows you will walk in front of or behind the lift.
- Never stand in an area where a load could fall off forks and strike you.
- Never ride on a forklift as a passenger.

Machine Safety

Never try to operate equipment you are not familiar with or trained to operate.

- Never place hands in areas where there are moving parts or crush zones.
- Never reach into a machine while it is operating.

Machine Guarding

- Never remove a guard from a machine
- Do not use any machines with a guard missing. Report the problem immediately to your supervisor.
- Never reach around a guard.
- Never rig or bypass a guard.

Housekeeping

- It is important not to leave lumber, scrap, or garbage on the floor.
- Items not stored correctly will cause a trip hazard.
- Water or oil on the floor will create slip hazards for employees or fork lifts.
- Clean up or immediately notify your supervisor of these conditions.

Lifting and Moving Material

- Always check the weight of an object prior to lifting it.
- If it seems heavy get help from another person, use a forklift or a crane.
- Stretch and plan the path of travel before the lift.

- Always lift with your legs keeping your back straight.
- Never twist while carrying a load.

Fire Procedures

- If you find a fire smaller then a small trash can you can try and put it out.
- Anything larger sound the alarm, notify your supervisor and evacuate the building.
- Assemble in your designated area outside
- Report any missing coworkers to your supervisor.

Fire Extinguishers

- Fire extinguishers only have a minute of retardant in each extinguisher.
- So you will only be able to put out fires the size of a small trashcan.
- To use a fire extinguisher Remember PASS
- Pull the pin
- Aim at the base of the fire
- Squeeze the handle
- Sweep the base of the fire

GENERAL SAFETY INFORMATION

1. Employee must not make inoperative, safety devices, such as relief valves, deluge valves, electrical and mechanical interlocks, guards, seat belts, etc. except for maintenance and testing with approval of the responsible supervisor.

2. Running in the plant must be avoided except in case of emergency.

3. Horse-play in any form must not be engaged in by employees in the plant or while on duty.

4. All portable containers such as bottles, jugs or cans must be labeled as to contents.

5. Flammable or toxic materials must not be dumped into the sewer or waste water systems.

6. Wearing of finger rings, ties, bracelets, and necklaces is not permitted while operating fixed power tools and is discouraged in all operating, maintenance and service areas.

7. All employees are expected to wear personal clothing that is proper for their jobs. Company-furnished clothing and protective equipment must not be altered in any manner that impairs the needed protective features.

8. Wearing canvas shoes, sandals, slippers, or going barefoot is prohibited. Safety shoes are required in the plant. Clerical workers are exempt from this rule.

9. Seat belts must be used at all times in the company owned or leased vehicles. Employees using personal and rental cars on authorized company business are also required to use their seat belts.

10. Employees are permitted to ride on mobile equipment only when a seat belt is provided.

11. All motor vehicle accidents involving personnel on company business must be reported at once.

12. The supervisor shall be notified when an employee needs to leave work due to illness.

13. All employees must notify their supervisor of any injury or accident. Late developing injuries should also be reported.

14. Only authorized personnel shall operate mobile equipment.

Sierra Packaging and Converting, LLC

Employee Name: _____ Clock No.: _____

Training Topics Covered In The Employee Safety Handbook:

- GENERAL HEALTH & SAFETY POLICIES
- THE IMPORTANCE OF WORKING SAFELY & WHAT IT INVOLVES
- YOUR SAFETY RIGHTS
- EMPLOYEE RESPONSIBILITIES
- EMPLOYEE SAFETY RULES
- EMPLOYEE ACCESS TO EXPOSURE & MEDICAL RECORDS
- BLOODBORNE PATHOGENS – GENERAL AWARENESS
- REPORTING OF INJURIES AND ACCIDENTS
- SEEKING MEDICAL TREATMENT FOR WORK RELATED INJURIES
- WORKERS' COMPENSATION FRAUD
- HORSE PLAY
- DISCIPLINARY ACTION
- RETURN TO WORK POLICY
- DRUG & ALCOHOL TESTING POLICY
- OSHA'S HAZARD COMMUNICATION STANDARD
- PERSONAL PROTECTIVE EQUIPMENT (PPE): JOB REQUIREMENTS, CARE & LIMITATIONS OF PPE.
- EYE SAFETY
- LOCKOUT/TAGOUT: CONTROL OF HAZARDOUS ENERGY
- ELECTRICAL SAFETY
- FORKLIFT OPERATION
- MACHINE SAFETY & GUARDING
- LIFTING & MOVING MATERIAL HOUSE KEEPING
- FIRE PROCEDURES & USE OF FIRE EXTINGUISHERS
- GENERAL SAFETY INFORMATION

I have read and understand all of the information covered in the Employee Safety Handbook. The topics covered in the handbook are listed above. In addition, I have read and understand Sierra Packaging and Converting, LLC Accident Prevention and Safety Plan.

Employee Signature: _____ Clock No.: _____

Witness Signature: _____ Date: _____

IN THE SUPREME COURT OF THE STATE OF NEVADA

Case No. 71130

Electronically Filed
Dec 14 2016 03:52 p.m.
Elizabeth A. Brown
Clerk of Supreme Court

SIERRA PACKAGING & CONVERTING, LLC,

Appellant,

vs.

THE CHIEF ADMINISTRATIVE OFFICER OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION OF THE DIVISION OF INDUSTRIAL RELATIONS OF THE DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA; AND THE OCCUPATIONAL SAFETY AND HEALTH REVIEW BOARD,

Respondents.

JOINT APPENDIX, VOLUME 1 OF 2, Part 1

McDONALD CARANO WILSON LLP Timothy E. Rowe (#1000) 100 West Liberty Street, 10th Floor Reno, NV 89501 775-788-2000 (phone) 775-788-2020 (fax) trowe@mcdonaldcarano.com *Attorneys for Appellant* *Sierra Packaging & Converting, LLC*	DIVISION OF INDUSTRIAL RELATIONS SALLI ORTIZ, ESQ. (#9140) 400 W. King Street, Ste. 201 Carson City, NV 89703 Telephone: 684-7286 Facsimile: 687-1621 sortiz@business.nv.gov *Attorneys for Respondent* *Nevada Division of Industrial Relations*

Docket 71130 Document 2016-38849

ALPHABETICAL INDEX TO APPENDIX

Division of Industrial Relations Documentary Evidence for March 12, 2014 Board

Documentary Evidence for March 12, 2014

- Employee Safety Handbook ..... JA 54
- Accident Prevention & Safety Manual ..... JA 67
- SCATS Consultation Report ..... JA 226

Excerpt from Respondent, Division of Industrial Relation's Answering Brief ..... JA 399

Findings of Fact, Conclusions of Law and (Final) Order dated July 28, 2014 .... JA 346

Hearing ..... JA 1

Nevada OSHA Review Board Decision dated April 11, 2014 ..... JA 330

Notice of Entry of Order Denying Petition for Judicial Review ..... JA 381

Order Denying Petition for Judicial Review ..... JA 369

Petition for Judicial Review ..... JA 353

Transcript of Nevada OSHA Review Board March 12, 2014 Hearing ..... JA 242

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Division of Industrial Relations Documentary Evidence for March 12, 2014 Board Hearing ..... JA 1

Documentary Evidence for March 12, 2014

- Employee Safety Handbook ..... JA 54
- Accident Prevention & Safety Manual ..... JA 67
- SCATS Consultation Report ..... JA 226

Volume 2

Transcript of Nevada OSHA Review Board March 12, 2014 Hearing ..... JA 242

Nevada OSHA Review Board Decision dated April 11, 2014 ..... JA 330

Findings of Fact, Conclusions of Law and (Final) Order dated July 28, 2014 .... JA 346

Petition for Judicial Review ..... JA 353

Order Denying Petition for Judicial Review ..... JA 369

Notice of Entry of Order Denying Petition for Judicial Review ..... JA 381

Excerpt from Respondent, Division of Industrial Relation's Answering Brief ..... JA 399

IN THE SUPREME COURT OF THE STATE OF NEVADA

AFFIRMATION

Pursuant to NRS 239B.030

The undersigned does hereby affirm that the preceding document, **JOINT APPENDIX VOLUME 1** filed in **Case No. 71130** does not contain the social security number of any person.

Date: December 14, 2016.

/s/ Timothy E. Rowe
Timothy E. Rowe

CERTIFICATE OF SERVICE

Pursuant to NRCP 5(b) and NRAP 30(f)(2), I hereby certify that I am an employee of McDonald Carano Wilson LLP and a true and correct copy of the foregoing document was e-filed and e-served on all registered parties to the Supreme Court's electronic filing system.

Dated: December 14, 2016.

/s/ Carole Davis
Carole Davis

COPY

NEVADA OCCUPATIONAL SAFETY AND HEALTH

REVIEW BOARD

CHIEF ADMINISTRATIVE OFFICER OF THE OCCUPATIONAL SAFETY AND HEALTH ADMINISTRATION OF THE DIVISION OF INDUSTRIAL RELATIONS OF THE DEPARTMENT OF BUSINESS AND INDUSTRY, STATE OF NEVADA,

Complainant,

vs.

SIERRA PACKAGING & CONVERTING, LLC,

Respondent.

/

DOCKET NO: RNO 14-1684

STATE OF NEVADA
Division of Industrial Relations - Division Counsel's Office
400 West King Street, Suite 201, Carson City, Nevada 89703
Telephone: (775) 684-7286 Fax: (775) 687-1621

EVIDENCE PACKET for the DIVISION OF INDUSTRIAL RELATIONS

Exhibit 1 DOCUMENT	PAGE(S)
• Business Information from Secretary of State	1-2
• Referral Report	3
• Employer Opening Conference	4
• Inspection Report	5
• Inspection/Safety Narrative (OSHES-1A)	6-9
• Written Safety Program Evaluation	10
• CSHO Drawing	11
• Employer Closing Conference	12
• Employee Statements	13-15
• Worksheet (OSHES-1B)	16-18
• Citation and Notification of Penalty – 9/10/13	19-30
• Contest Letter – 9/26/13	31
• Summons & Complaint	32-36
• Answer to Complaint	37-40
• Photographs	41-49

AFFIRMATION (Pursuant to NRS 339B.030)

The undersigned affirms that the EVIDENCE PACKET FOR THE DIVISION OF INDUSTRIAL RELATIONS, in OSH Review Board, Docket No. RNO 14-1684, does not contain the social security number of any person.

Dated this 12th day of March, 2014.

Submitted by:

Salli Ortiz, Division Counsel
Division of Industrial Relations

R:\Legal\FY2014\OSHA Reno\Sierra Packaging 1684\Bs DRAFT Sierra Packaging Evidence Cover Sheet.doc

SIERRA PACI AGING & CONVERTIN, LLC

Business Entity Information

Status:	Active	File Date:	4/28/2004
Type:	Domestic Limited-Liability Company	Entity Number:	LLC8996-2004
Qualifying State:	NV	List of Officers Due:	4/30/2015
Managed By:	Managing Members	Expiration Date:	4/28/2504
NV Business ID:	NV20041084930	Business License Exp:	4/30/2015

Additional Information

Central Index Key:	

Registered Agent Information

Name:	ROBERT YARHI / CONTROLLER	Address 1:	1400 KLEPPE LANE
Address 2:		City:	SPARKS
State:	NV	Zip Code:	89431
Phone:		Fax:	
Mailing Address 1:		Mailing Address 2:	
Mailing City:		Mailing State:	NV
Mailing Zip Code:			
Agent Type:	Noncommercial Registered Agent		

Financial Information

No Par Share Count:	0	Capital Amount:	$ 0

No stock records found for this company

Officers

☐ Include Inactive Officers

Managing Member - ROBERT YARHI

Address 1:	11005 STEAD BLVD.	Address 2:	
City:	RENO	State:	NV
Zip Code:	89506	Country:	USA
Status:	Active	Email:	

Actions\Amendments

Action Type:	Articles of Organization		
Document Number:	LLC8996-2004-001	# of Pages:	1
File Date:	4/28/2004	Effective Date:	

(No notes for this action)

Action Type:	Initial List		
Document Number:	LLC8996-2004-002	# of Pages:	1
File Date:	5/26/2004	Effective Date:	

List of Officers for 2004 to 2005

Action Type:	Annual List		
Document Number:	LLC8996-2004-003	# of Pages:	1
File Date:	7/8/2004	Effective Date:	

(No notes for this action)

Action Type:	Annual List		

Document Number:	20050095826-97	# of Pages:	1
File Date:	3/18/2005	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20060251626-10	# of Pages:	1
File Date:	4/19/2006	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20070193271-02	# of Pages:	1
File Date:	3/19/2007	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20080295012-59	# of Pages:	1
File Date:	4/28/2008	Effective Date:	
08/09			
Action Type:	Annual List		
Document Number:	20090122244-26	# of Pages:	1
File Date:	2/10/2009	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20100168104-23	# of Pages:	1
File Date:	3/18/2010	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20110164043-22	# of Pages:	1
File Date:	3/3/2011	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20120192305-05	# of Pages:	1
File Date:	3/20/2012	Effective Date:	
(No notes for this action)			
Action Type:	Registered Agent Change		
Document Number:	20120750394-13	# of Pages:	1
File Date:	11/2/2012	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20130160296-30	# of Pages:	1
File Date:	3/8/2013	Effective Date:	
(No notes for this action)			
Action Type:	Annual List		
Document Number:	20140125945-73	# of Pages:	1
File Date:	2/21/2014	Effective Date:	
(No notes for this action)			

State of Nevada
Department of Business & Industry
Division of Industrial Relations
Occupational Safety and Health Administration

Referral Report

8/9/13 14-028

Reporting ID	0953210	Previous Activity	0		Referral Number	203342696	
Establishment Information	Establishment Name	SIERRA CONVERTING			Employer ID		
	Site Address	11005 Stead Blvd Reno NV 89506			City Code 0170	County Code	031
		Site Phone	(775) 331-8221		Site Fax		
	Mailing Address	11005 Stead Blvd Reno NV 89506					
		Mailing Address Phone	(775) 331-8221		Fax		
Industry & Ownership	Type of Business		Primary SIC 5199		Primary NAICS 424990	No. of Employees	85
	Ownership	A. Private Sector					
Source	Referred By	I. Other			Date Received	08/09/13	
	Source or Contact (Name, Location, Affiliation, Telephone Number):						
Referral Classification	Safety - Serious						

HAZARD DESCRIPTION:

1. Employees climbing in racking without being protected from falls.
2. Employees operating powered industrial trucks without certificate of training.

Referral Action	Send Letter	Date Letter Sent	Date Response Due	Response Received (Satisfactory or Not Satisfactory)	Supervisor(s) Assigned	
	Inspection Planned? Yes	If Yes, Priority: 3		If No, Reason:		
	Transfer To (Name):			Transfer Date		
	Transfer To Category:					
Strategic Initiatives						
National Emphasis						
Local Emphasis						
Optional Information	Type	ID	Optional Information Value			
Close Referral	X					
Comments						

OSHA-90 (2/96)

DIVISION OF INDUSTRIAL RELATIONS
Occupational Safety and Health Administration
Employer Opening Conference

Authority - NRS 618.315, 618.325, NAC 618.6434 and Nevada Operations Manual (NOM)

Owner/General Contractor Name: Sierra Packing & Converting LLC
Date: 16 Aug. 13 Time: 11:00

THE OPENING CONFERENCE - Explain the following:

1. The purpose, scope and nature of the inspection (including expansion info.), Abbreviated Opening - IMMINENT DANGER - Show I.D.
2. The Legal Authority for the inspection.
3. The Controlling Employer has the right to deny entry, explain (Warrant).
4. Is this an OCIP/CCIP site? Y or N If yes, who is your safety coordinator on site? _____
5. The employer must designate a walk-around representative: Sean E O'Grady
6. Union / Non-Union (circle one). The employees' representative must be notified that an inspection is being conducted. Representative Name(s): _____
Will they accompany the Inspector during the walk-around? Y ____ N ____
Telephone / Cell Phone Contact # _____
7. The inspector has the right to deny disruptive person's participation in the inspection.
8. The Employers will be informed of how trade secrets are protected.
9. Designate records/posters to be reviewed (Written Safety Program, LO/TO Program, Confined Space Program, Hazard Communication Program, OSHA Form 300 & 300A and other pertinent Programs).

WALKAROUND PROCEDURES

1. Violations will be brought to the employers' and employees' attention and noted.
2. Private interviews may be held with employees (Explain NRS 618.445 Discrimination).
3. Photos and/or Videos may be taken related to the purpose of the inspection.
4. Necessary test equipment may be used to document findings.
5. Personal Protective Equipment may be checked.

The Employer: GRANTS Entry _____ Initials DENIES Entry _____ Initials

EMPLOYER REPRESENTATIVE

Name: Sean Tracy Print Title: X Plant Mgr

X _____ Sign

OSHA REPRESENTATIVE

Name: Jennifer F. Cox Print Title: CSHO

_____ Sign

317 22 4608

JC-009-14

9 4

State of Nevada
Department of Business & Industry
Division of Industrial Relations
Occupational Safety and Health Administration

Inspection Report

Thu Aug 29, 2013 8:21am

1-14-12

Rpt ID	Assignment Nr.	SHR ID	Supervisor ID	Inspection Nr.	Opt. Insp. Nr.
0953210	0	Q7619	Z0254	317224608	JC-009-14

Establishment Name: SIERRA PACKING & CONVERTING LLC

Site Address	11005 Stead Blvd Reno, NV 89506	Site Phone	(775) 331-8221	Site FAX	(775) 331-8385
Mailing Address	11005 Stead Blvd Reno, NV 89506	Mail Phone	(775) 331-8221	Mail FAX	(775) 331-8385
Controlling Corp	Same	Employer ID			
Ownership	A. Private Sector	City	0170	County	031
Legal Entity	A. Corporation	Previous Activity (State Only)			

Related Activity

Type	Number	Satisfied	Type	Number	Satisfied
R. Referral	203342696	Safety			

Employed in Establishment	140	Advance Notice?	No	Category	S. Safety
Covered By Inspection	3	Union?	No	Primary SIC	2759
Controlled By Employer	140	Walkaround?	Yes	Secondary SIC	
		Interviewed?	Yes	Inspected	

Inspection Type	C. Referral	Reason No Inspection	
Scope of Inspection	B. Partial Inspection		
Classification	Safety Planning Guide/Manufacturing		
Strategic Initiatives			
National Emphasis			
Local Emphasis			

		Denial Date	Date ReEntered	Date ReDenied	ReEntered
Anticipatory Warrant Served?	No				
Anticipatory Subpoena Served?	No				

Entry	08/16/13	10:50	First Closing Conference	08/19/13	11:00
Opening Conference	08/16/13	11:00	Second Closing Conference		
Walkaround	08/16/13	11:15	Exit	08/19/13	11:15
Days On Site	2		Case Closed		
			No Citations Issued		

Type	ID	Optional Information
N	20	W/C VERIFED, EXPIRES 01-01-14
N	20	WSP REVIEWED, 08-19-13

CSHO Signature	Jenifer Cox	Date	August-29-13
Reviewer Signature	Rich Mew	Date	9-3-13

Occupational Safety and Health Administration

Inspection Narrative

Inspection Nr.	317224608
Opt. Case Number	JC-009-14

Establishment Name	SIERRA PACKING & CONVERTING LLC		
Legal Entity	A. Corporation	Type of Business	Commerial printing

Additional Citation Mailing Addresses	

Organized Employee Groups	

Authorized Employee Representatives	

Employer Representatives Contacted

Name	Title	Function
Mr. Woody O'Grady	Sales	I O C
Mr. Steve Tintinger	Maintenance Supervisor	C
Mr. Dave Hodges	Safety Training	I O C
Mr. Juan Emilio Azolas	General Manager	I C
Mr. Robert Yarhi	President	I C

Other Persons Contacted

Mr. Andres Gonzalez(775)448-0329 Maintenance - 1360 Nannette Cir. Reno, NV 89502 Mr. Hugo Rene Caal(206)841-5548 Maintenance - 8 Glen Carran Cir. Sparks, NV 89431	Mr. Herlindo Aguilar Soto(775)379-1171 Housekeeping - 9022 Flagg Street Reno, MN 89502

Entry	08/16/13	10:50	First Closing Conference	08/19/13	11:00
Opening Conference	08/16/13	11:00	Second Closing Conference		
Walkaround	08/16/13	11:15	Exit	08/19/13	11:15
			Case Closed		

Followup Inspection?	Y	Reason	Serious Citation

Coverage Information/Additional Comments

SAFETY NARRATIVE

TYPE OF INSPECTION: Referral #203342696

SAFETY AND HEALTH PROGRAM: The Workers Compensation Insurance was verified and expires 01-01-14. The Written Safety Program was reviewed on 08-19-13. The OSHA 300 logs were not reviewed due to the nature of the inspection.

OPENING CONFERENCE NOTES: The Opening Conference was conducted by CSHO Cox with the following employer representative;

Mr. Woody O'Grady, Sales, Sierra Packaging & Converting, LLC

The nature, purpose, scope and authority to conduct the inspection were discussed along with the employer's rights and responsibilities. All questions were answered and the Opening Conference ended.

WALKAROUND OBSERVATIONS: The Walkaround Inspection was conducted on 08-16-13 with Mr. O'Grady and Mr. Sean Tracy, Plant Manager, Sierra Packaging & Converting, LLC. The company was in the process of moving the facility from 1400 Kleppe Lane, Sparks, Nevada to the new facility located at 11005 Stead Blvd. Reno, Nevada. The facility located at Stead was 186,000 square feet and was in full operation at the time of inspection. The company started operations on 08-03-13 for the new facility.

During the inspection, the following management personnel were contacted during the investigation;

Mr. Steve Tintinger, Maintenance Supervisor, Sierra Packaging & Converting, LLC
Mr. Dave Hodges, Safety/Training, Sierra Packaging & Converting, LLC
Mr. Juan Emilio Azolas, General Manager, Sierra Packaging & Converting, LLC
Mr. Juan C. Costa and Mr. Leonel Cabrera, Translators for interviews, Sierra Packaging & Converting, LLC
Mr. Robert Yarhi, President, Sierra Packaging & Converting, LLC

Referral #203342696 listed the following items;
(The referral included a picture of three employees at the top tier of racking)

1. Employees climbing in racking without being protected from falls. VALID AT TIME OF INSPECTION Mr. O'Grady was asked to escort CSHO Cox to the warehouse/racking section of the facility. A comparison was made between the photo provided with the referral and the east section of the loading dock facing west. The racking and ducting were the same as in the picture. Mr. O'Grady was shown the picture and questioned who the employees were standing at the top tier of the racking. Mr. O'Grady discussed the photo with Mr. Tracy and determined the photo was of the maintenance personnel.

Mr. O'Grady directed Mr. Steve Tintinger to come to the loading dock. Upon arrival, Mr. Tintinger was questioned by Mr. O'Grady who the personnel were and Mr. Tintinger identified one of the employees who was interviewed by CSHO Cox.

Mr. O'Grady relayed, it was not company policy for any employee to climb on the racking. Mr. O'Grady directed Mr. Tintinger to bring the employee to the loading dock. CSHO Cox accompanied Mr. Tintinger to locate the employee.

During the walk to the maintenance/storage cage, an employee was observed using a DeWalt grinder without the guard installed. CSHO Cox directed Mr. O'Grady to stop the work which Mr. O'Grady complied. The grinder was taken out of service. The extension cord used by the employee had electrical tape at two sections of the cord. CSHO Cox asked Mr. Tintinger to remove the tape. The tape was removed which showed exposed conductors.

Mr. O'Grady stated, "The employees should not have been using the equipment and if any of his management personnel had seen the situation they would have been stopped". In addition, "The Company had purchased new extension cords and the company would not have allowed usage of the extension cord". The extension cord was taken out of service.

Mr. Tintinger was questioned, if he had observed the usage of the grinder or extension cord. Mr. Tintinger stated, "He had not".

Employer knowledge could not be fully established. Employer had work rules against removing guards, enforcement of work rules, employer removed extension cord and grinder from service.

Mr. Tintinger identified one of the employees who was in the picture. Employee #1 did speak some English but appeared very nervous and not fully understanding the questions. Employee #1 was questioned if he would like a translator. Employee #1 stated "Yes".

A translator was provided by the employer, Mr. Juan C. Costa. Employee #1 did state he was the employee standing in the middle of the picture. Employee #1 stated he was not aware he could not climb in the racks since the employer had provided him with fall protection. The employee was asked to get the fall protection. The employee retrieved his fall protection equipment which consisted of a five point body harness, six foot lanyard with a three foot shock pack.

Employee #1 was questioned, what was the anchor point when accessing the racking. Employee #1 stated "the racking itself". Employee #1 was then questioned what was the fall distance required for his system. Employee #1 could not answer the question. Employee #1 was also questioned what the anchor point should be rated for. Employee #1 replied "200 pounds".

Employee #1 was questioned, who directed him to work on the racking. Employee #1 "stated "Osvaldo Gimenes, lead, directed him". Employee #1 was questioned, if Mr. Gimenes follow-up with their work. Employee #1 stated "he did not".

Employee #2 was interviewed and questioned if he was one of the employees in the picture. Employee #2 stated "He was but he was standing on a ladder". Employee #2 was questioned who directed him to work on the racking. Employee #2 stated "Steve (maintenance manager) told the employees to secure the racking and to use either ladders or fall protection. Employee #2 was questioned what was the fall clearance distance required for the 5 point body harness. Employee #2 could not answer the question.

The third employee on the racking could not be identified. The height of the racking was 15 feet and seven inches (measurement provided by Mr. Tintinger).

Mr. O'Grady was asked to provide the Workplace Hazard Assessment for the facility. Mr. O'Grady directed the request to Mr. Hodges. Mr. Hodges was questioned if a Workplace Hazard Assessment had been performed for the facility. Mr. Hodges relayed "A hazard assessment had been performed for the old facility but one had not been performed for the new facility".

Mr. O'Grady stated the company had just moved into the facility the 3rd of the month and he believed they had 60 days to perform the hazard assessment.

A verbal request was made to Mr. Hodges on the 08-19-13 for a copy of the Workplace Hazard Assessment and on 08-21-13 an email request was made. The employer did not provide any documentation.

A Serious Citation was recommended for no workplace hazard assessment

2. Employees operating powered industrial trucks without certification of training. NOT VALID AT TIME OF INSPECTION
At the time of the inspection, the employer provided training and certification records of the operators of powered industrial trucks.

CLOSING CONFERENCE: The Closing Conference was conducted on 08-19-13 with Mr. O'Grady, Mr. Hodges, Mr. Azolas, Mr. Tintinger, and Mr. Yarhi. The following recommendation was discussed and abatement date was agreed upon:

Recommended Serious Citation:

No Workplace Hazard Assessment, abatement, 30 days

The posting instructions were explained along with the appeals process. SCATS services were described. An Employer Survey Form and NV3000 form was given to Mr. O'Grady. All questions were answered and the Closing Conference ended.

On 08-22-13, Mr. O'Grady, called to request additional time to submit the Workplace Hazard Assessment from the1400 Kleppe Lane, Sparks, Nevada, due to Mr. Hodges being out of the office. Mr. O'Grady was questioned by CSHO Cox if the

Workplace Hazard Assessment was done. Mr. O'Grady stated the assessment was not fully completed. CSHO Cox informed Mr. O'Grady to send what they had even if the report was not complete. As of 08-27-13, no paperwork/assessment had been submitted.

On 08-29-13, a second Closing Conference was conducted with Mr. O'Grady via telephone. The Following recommendations were discussed and abatement dates were agreed upon;
Recommended Serious Citation;

Worker Training on/for personal protective equipment usage, abatement, 30 days

Recommended Other than Serious Citation;

No Workplace Hazard Assessment, abatement, 30 days

All questions were answered and the Closing Conference ended.

SHR Signature		Date	August-29-13
Accompanied By			

15- 1

State of Nevada Occupational Safety and Health Administration
Written Safety Program Evaluation

Sierra Packing & Converting LLC — 19 Aug 13

Company Name — Date

Indicate the location in the WSP where each NRS and NAC requirement was located. Make note if deficiencies existed in the required element.

1. Statement explaining that the managers, supervisors, and employees are responsible for carrying out the program:

   YES, PAGE 4 - 5 - 6

2. Explanation of the methods used to identify, analyze, and control new and existing hazardous conditions:

   YES, PAGE

3. Explanation of the methods used to ensure that employees receive the appropriate safety and health training before performing their work duties:

   YES, PAGE 7-8 -

4. Procedures that must be followed to investigate an accident which has occurred and the corrective actions that are to be initiated:

   YES, PAGE - 16

5. Method for ensuring that employees comply with the safety rules and work practices:

   YES, PAGE 3

6. Safety committee – required with more than 25 employees:

   YES, PAGE 10 - SAFETY Policy STATEMENT - PAGE 8 - Accident Prevention / Safety Manual

7. Are the safety committee meeting minutes and training records maintained for 3 years:

   YES,

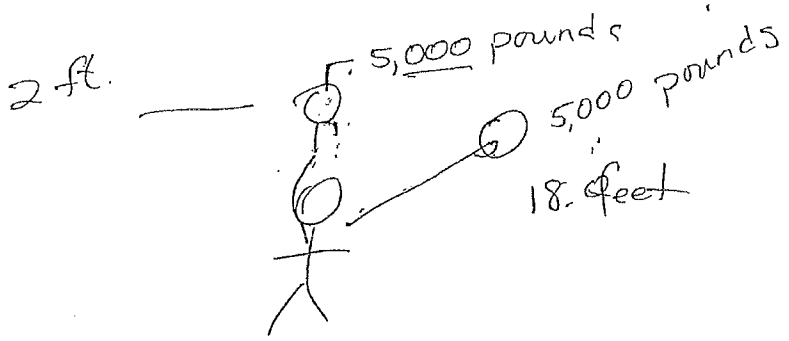
8. Is the WSP and any related training programs made available to employees in a language and format that they understand:

   Yes, programs provided in Spanish & TRANSlation -

9. Has the WSP been fully implemented?

   YES

Inspector's Signature


2 ft.
5,000 pounds
5,000 pounds
18. feet

DIVISION OF INDUSTRIAL RELATIONS
Occupational Safety and Health Administration
Employer Closing Conference

Authority - NRS 618.315, 618.325, NAC 618.6434 and Nevada Operations Manual (NOM)

Owner/General Contractor Name: Sierra Packing & Converting, LLC

Date: 19 Aug 13 Time: 12:35

The Closing Conference - Explain the following:

1. Union / Non-Union (circle one). The employees' representative must be notified that a closing conference is being conducted, that they can attend the informal conferences and that they must request copies of the citations or no copy will be sent to them. Representative Name(s): PA

   Will they attend this closing conference? Y ____ N ____ Phone Contact # ____

2. Review with the employer the Complaint, Referral and/or Accident Investigation results, if applicable.
3. Violation(s) observed during the inspection, standards and reasonable abatement procedures and time.

   Recommendation - HAZ ASSESSMENT / TNG PPE - 30 days - W/O

   / Nothing Follows /

4. Proposed citations and posting requirements (3 day minimum).
5. The employer's rights following an NVOSHA inspection concerning an Informal Conference, Post Contest, and Review Board. Provide the NVOSHA Form 3000S.
6. Follow-up inspections (Repeat, Failure to Abate, and Willful Citations).
7. Safety Consultation and Training.
8. Referral of potential safety/health problems to other agencies. YES / NO
9. Employer Survey Form.

The above items were discussed with: Check here if by telephone: ☐

EMPLOYER REPRESENTATIVE

Name: Woody O'Grady (Print) Title: SALES

Woody O'Grady (Sign)

OSHA REPRESENTATIVE

Name: Jennifer F. Cox (Print) Title: CSHO

Jennifer F. Cox (Sign)

STATE OF NEVADA – OSHA
4600 Kie[illegible] Lane, Building F #153 Reno, Neva[illegible] 9502

~~Ad~~ ANDRES GONZALEZ — NAME
530 948 0329 — TELEPHONE #
1360 Nannette Cir — ADDRESS
Reno — CITY
STATE
89502 — ZIP
Maint. — JOB DESCRIPTION
2 months – — LENGTH OF EMPLOYMENT / HIRE DATE

STATEMENT:

* Employee did climb RACKING – TO FIX metal. Oswaldo & Gimenes, ~~Maint.~~ supervisor – Lead – instructed Employee to put metal in correct position – did not follow-up OR inspect work of Employee ——
* Employee WAS NOT AWARE he could not climb the RACKS –
* Employee HAS NOT REC'd SAFETY TNG AT JOB –
* Employee NOT injured AT JOB SITE –
* Employee NOT AWARE of SAFETY PROGRAM –

/ Nothing follows /

- I request that my statement be held confidential to the extent allowed by law. (YES) NO
- The inspector discussed employee's protection from discharge or discrimination for participation in this inspection.
- I have read the above and it is true to the best of my knowledge.

EMPLOYEE SIGNATURE — DATE 16/08/13

CSHO SIGNATURE — DATE 16 Aug 13

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14 13

STATE OF NEVADA – OSHA
4600 Kie[illegible]e Lane, Building F #153 Reno, Nevad[illegible]0502

Hugo Rene Caal
NAME

206-841-5548
TELEPHONE #

8 Glen Carran Cir
ADDRESS

Sparks
CITY

STATE

89431
ZIP

Maint.
JOB DESCRIPTION

1 month
LENGTH OF EMPLOYMENT / HIRE DATE

STATEMENT:

* SAFETY TRG. HARNESS, SAFETY GLASSES, GLOVES, employer provided – TRN'ING PROVIDED in Spanish
* Employee STATED Employee's ARE NOT TO climb RACKS – Employee is in picture, but was standing on ladder. Other two Employees were STANDING on RACKING
* Steve direct employee's to secure METAL between the 2 RACKS – Steve is the maint. Mg.
* Steve told you & ANDRES to use fall protection (5 point body HARNESS AND ladder) – I used the ladder instead of the body HARNESS
* No MANAGEMENT observed WORK being done on the Racking

/ Nothing follows /

- I request that my statement be held confidential to the extent allowed by law (YES) NO
- The inspector discussed employee's protection from discharge or discrimination for participation in this inspection.
- I have read the above and it is true to the best of my knowledge.

– TRANSLATED BY JUAN C COSTA 8/16/13

Hugo Rene Caal
EMPLOYEE SIGNATURE

DATE

CSHO SIGNATURE

16 Aug 13
DATE

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"2" 14

STATE OF NEVADA – OSHA
4600 Kie e Lane, Building F #153 Reno, Nevad 9502

HERLINDO AGUILAR SOTO — 775-379-1171
NAME — TELEPHONE #

9022 Flagg street — Reno — 89502
ADDRESS — CITY — STATE — ZIP

HOUSEKEEPING — 6 months total / 1 month here
JOB DESCRIPTION — LENGTH OF EMPLOYMENT / HIRE DATE

STATEMENT:

* Employee was TNG'd - Fall protection, hard hats, gloves, Employer provides PPE —
* Company has SAFETY WORK RULES, EXAMPLE can not climb in RACKS, CAN NOT RUN on production floor, Employee use chemicals (STORE type) AWARE of MSDS -
* Employee does not operate FORKLIFT -
* Employee had NO SAFETY ISSUES @ TIME of Inspection

/ Nothing follows /

- I request that my statement be held confidential to the extent allowed by law. YES NO
- The inspector discussed employee's protection from discharge or discrimination for participation in this inspection.
- I have read the above and it is true to the best of my knowledge.
- TRANSLATED BY JUAN C COSTA. 8/16/13

EMPLOYEE SIGNATURE — DATE

CSHO SIGNATURE — DATE 16 Aug 13

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"3" 15

State of Nevada, Department of Business and Industry
Division of Industrial F ..ions
Occupational Safety and Health Administration

Worksheet

Thu Sep 5, 2013 12:45pm

Inspection Number	317224608
Opt. Insp. Number	JC-009-14

Establishment Name	SIERRA PACKING & CONVERTING LLC				
Type of Violation	S Serious	Citation Number	01	Item/Group	001
Number Exposed	3	No. Instances	1	REC	
Std. Alleged Vio.	1910.0132(f)(1)(iv)				

Abatement Period	MultiStep Abatements			Final Abatement	Action Type/Dates
	PPE Period	Plan	Report		
30					

Abatement Documentation Required		Date Verified		

Substance Codes	

AVD/Variable Information:

29 CFR 1910.132(f)(1)(iv): The employer shall provide training to each employee who is required by this section to use personal protective equipment (PPE). Each such employee shall be trained to know the limitations of the PPE:

Facility; employees used a fall arrest system consisting of a five point body harness, six foot lanyard with a three foot shock pack to access the top tier racking located 15 feet, 7 inches high. The lack of knowledge of the minimum required distance from a suitable anchorage point to ground exposed user to an unarrested fall of 15 feet, 7 inches.

Penalty Calculations				Adjustment Factors			Proposed Adjusted Penalty
Severity	Probability	Gravity	GBP	Size	Good Faith	History	
H High	**L Lesser**	**05**	**5000.00**	**10**	**15**	**0**	**3825.00**
Repeat Factor		**0**					

Employee Exposure					
Occupation	**Maintenance**	Employer	**SIERRA PACKING & CONVERTING**		
Nr of Employees	**3**	Duration	**Monthly**	Frequency	**as required**
Employee Name	**Mr. Andres Gonzalez**				
Address	**1360 Nannette Cir. Reno, NV 89502**		Phone	(775)448-0329	
Occupation	Maintenance	Employer	SIERRA PACKING & CONVERTING		
Nr of Employees	3	Duration	Monthly	Frequency	as required
Employee Name	Mr. Hugo Rene Caal				
Address	8 Glen Carran Cir. Sparks, NV 89431		Phone	(206)841-5548	
Occupation	Housekeeping	Employer			
Nr of Employees	0	Duration		Frequency	
Employee Name	Mr. Herlindo Aguilar Soto				
Address	9022 Flagg Street Reno, MN 89502		Phone	(775)379-1171	

Instance Description: A. Hazard B. Equipment C. Location D. Injury/Illness E. Measurements

19. Date hazard identified: 08-16-13

20. Instance Description - Describe the following:

a) Hazards-Operation/Condition-Accident: Facility; employees used fall arrest system consisting of a five point body harness, six foot lanyard with a three foot shock pack to access the top tier (15 foot seven inches) racking. The employees were deficient in knowledge of arrest distance and anchorage requirements. The fall distance for engagement/clearance from anchor point of the system the employee was wearing was 17.5 feet (six foot lanyard, 3.5 shock pack, six feet height of worker, and 2 foot safety factor). The employees had no concept of fall distance for engagement/clearance. In addition, employees were not aware of the anchor point requirement strength.

b) Standard: 29 CFR 1910.132 (f) (1) (iv)

c) Designed to Prevent: Training in the use of personnel protective equipment ensures that the equipment is not misused resulting in the injuries of employees due to lack of knowledge of the personnel protective equipment limitations and proper usage.

d) Equipment: Fall arrest system, five point body harness, six foot lanyard with a three foot shock pack.

e) Location: Facility

f) Injury/Illness: Broken bones, hospitalization, and death = high severity

g) Measurements: Top tier of storage racking, 15 feet seven inches.

21. Photo: Yes

22. Employer Knowledge: The employer did not have a workplace hazard assessment to ensure employees were provided the correct personnel protective equipment and training for the equipment. Employees were using a five point body harness, six foot lanyard with a three foot shock pack. The employees did not know the fall distance for engagement or the anchor point requirements. Employees were authorized to use the system for fall protection accessing the top tier of a 15 foot seven inches racking. The employer was aware of the requirement to conduct a workplace hazard assessment but failed to conduct the assessment.

23. Comments (Employer, Employee, Closing Conference):

24. Other Employer Information: The employer had been inspected within the past five years and was issued Serious Citations

25. Case file information: Letters of Interpretation were reviewed

26. Type of Citation: Serious

27. Probability Rating: 0 to 5 = Lesser, 6 to 10 = Greater

#Exposed Employees: 3 = 3

Frequency/Duration: Monthly as required = 2

Proximity: At point of danger = 10

Stress/Conditions:

Other Factors:

Total Point Calculation: 3 + 2 + 10 = 15

Probability Calculation: 15 divided by 3 = 5 = lesser

28. Penalty Adjustment Factors (Explain Reduction for Each Item):

Size - (#) of employees = (10%) Employer had 140 employees

Good Faith - = (15%) Employer had a Written Safety Program

History - = (0%) The employer had been inspected within the past five years and was issued Serious Citations

Total Adjustment Factors = (25%)

Event Date	Event Code	Action Code	Citation Type	Penalty	Abate Date	Final Order
	Z Add transaction	A Add	S Serious	3825.00		

STATE OF NEVADA
Department of Business and Industry
Division of Industrial Relations
Occupational Safety and Health Administration
4600 Kietzke Lane, Bldg. F-153
Reno, NV 89502
Phone: (775)824-4600 FAX: (775)688-1378

Citation and Notification of Penalty

To:
SIERRA PACKING & CONVERTING LLC
and its successors
11005 Stead Blvd
Reno, NV 89506

Inspection Number: 317224608
Inspection Date(s): 08/16/2013-08/19/2013
Issuance Date: 09/10/2013
CSHO ID: Q7619
Optional Rpt. #: JC-009-14

Inspection Site:
11005 Stead Blvd
Reno, NV 89506

The violation(s) described in this Citation and Notification of Penalty is (are) alleged to have occurred on or about the day(s) the inspection was made unless otherwise indicated within the description given below.

To the Reader - The Nevada Occupational Safety and Health Act was created in order to "assure so far as possible every working man and woman in the State safe and healthful working conditions." OSHA is expending every effort to make this goal a reality, but we cannot do it without your continuing help and support. Therefore, we are providing you with this information so that you can help us help you. This information is also designed to explain the options available to you and is part of our ongoing program to promote cooperation among labor, management and government.

Employer Rights and Responsibilities - An inspection of your workplace was recently conducted in accordance with the Nevada Occupational Safety and Health Act (Chapter 618, Nevada Revised Statutes). The inspection revealed conditions which we believe to be in violation of the Act. The detailed nature of the violation(s) and the penalty(ies) are described in this Citation and Notification of Penalty. The items listed on the citation were discussed generally with your representative by the Occupational Safety and Health Administration (OSHA) Compliance Safety and Health Officer (CSHO). The following passages contain important information regarding your responsibilities and opportunities to respond to this notice. Please refer to the inspection number, located in the upper right-hand corner of these documents, in all correspondence.

The information relevant to the conditions found were evaluated by the CSHO's supervisor and it was determined that the violation(s) do(es) exist(s), and you have been issued this Citation and Notification of Penalty which explains in detail the exact nature of the violation(s) and any associated penalty(ies). For each apparent violation found during the inspection, the CSHO discussed with you the following:

* Nature of the violation;
* Possible abatement measures which you may take to correct the violative conditions;
* Possible abatement dates you may be required to meet; and
* Possible penalties.

The CSHO is a highly trained professional who can help you recognize and evaluate hazards as well as suggest appropriate methods of correcting violations. To minimize employee exposure to possible hazardous conditions, abatement efforts should always begin as soon as possible.

The following general information defines the types of violations:

Willful: A willful violation is defined as a violation in which either: (1) the employer committed an intentional and knowing violation of the Act, or (2) the employer knew that a hazardous condition existed and made no reasonable effort to eliminate it.

Serious: A serious violation exists when the workplace hazard could cause an accident or illness which would most likely result in death or serious physical harm, unless the employer did not know or could not have known with reasonable diligence of the violation.

Repeat: An employer may be cited for a repeat violation if that employer has been cited previously for a substantially similar condition and the citation has become a final order of the Nevada Occupational Safety and Health Review Board. A citation is currently viewed as a repeat violation if it occurs within 5 years either from the date that the earlier citation becomes a final order or from the final abatement date, whichever is later.

For purposes of determining whether a violation is repeated the following criteria generally apply:

1. Fixed Establishments: Citations issued to employers having fixed establishments (such as factories, terminals, and stores) are not normally limited to the cited establishment. A multifacility employer, for example, can be cited for a repeat violation if the violation recurred at any plant statewide and if a citation is obtained and reveals a repeated violation.

2. Nonfixed Establishments: For employers engaged in businesses having no fixed establishments (such as construction sites), repeat violations are alleged based on prior violations occurring anywhere, and at any of the employer's identified establishments statewide, based on employer history.

Other-Than-Serious: An other-than-serious violation is defined as a situation in which the most serious injury or illness that would likely to result from a hazardous condition cannot reasonably be predicted to cause death or serious physical harm to exposed employees, but does have a direct and immediate relationship to their safety and health.

Failure to Abate: A failure to abate violation exists when the employer has not corrected a violation for which OSHA has issued a citation and the abatement date has passed or is covered under a settlement agreement. A failure to abate also exists when the employer has not complied with interim measures involved in a long-term abatement within the time given.

This Citation and Notification of Penalty describes violations of the Nevada Occupational Safety and Health Act of 1973. The penalty(ies) listed herein is (are) based on these violations. You must abate the violations referred to in this Citation by the date(s) listed and pay the penalty(ies) proposed, unless within 15 working days (excluding weekends and legal holidays) from your receipt of this Citation and Notification of Penalty, you mail a notice of contest to OSHA at the address on page 1. **OSHA <u>must receive</u> your Notice of Contest by 5:00 P.M. Pacific**

Standard Time (PST) on the 15th working day. Issuance of this Citation does not constitute a finding that a violation of the Act has occurred unless there is a failure to contest as provided for in the Act or, if contested, unless this Citation is affirmed by the Nevada Occupational Safety and Health Review Board or a court.

Posting - Upon receipt of this Citation and Notification of Penalty, you must post the citation (or copy of it) at or near the place each violation occurred to inform employees of the hazard to which they may be exposed. If, because of the nature of the employer's operation, it is not practical to post the citation at or near the place where each violation occurred, the citation must be posted in a prominent place where it will be readily observed by all affected employees. The citation must remain posted for three working days or until the violation is corrected, whichever is longer. (Saturdays, Sundays, and legal holidays are not counted as working days). YOU MUST COMPLY WITH THESE POSTING REQUIREMENTS EVEN IF YOU CONTEST THE CITATION. The penalty dollar amounts need not be posted and may be marked out or covered up prior to posting.

The abatement certification documents--such as abatement certifications, abatement plans and progress reports--also must be posted at or near the place where the violation occurred. For moveable equipment found to be in violation and where the posting of violations would be difficult or impractical, the employer has the option to identify the equipment with a "Warning" tag specified in the Nevada Administrative Code 618.6465.

Notification of Corrective Action - For each violation which you do not contest, you are required to submit an **Abatement Certification form(s), located on page 9**, to the District Manager. The certification must be mailed or faxed to our office within 10 calendar days after the abatement date indicated on the citation. You are also required to submit documents that provide proof of abatement (examples: evidence of the purchase or repair of equipment, photographs, videotape, training records, or other written records, etc.) with the Abatement Certification. If the citation indicates that the violation item was corrected during the inspection (Abated During Inspection), no Abatement Certification is required for that item.

When the citation permits an extended time for abatement, you must ensure that employees are adequately protected during this time. For example, the citation may require the immediate use of personal protective equipment by employees while engineering controls are being installed. When such is the case and where indicated on the citation, you must also provide OSHA with an abatement plan (steps you will take to protect employees and correct the hazards) and periodic progress reports on you actions.

Penalty Payment - The penalty(ies) itemized on the Citation and Notification of Penalty is/are payable within 15 working days of receipt of the penalty notice. However, if you contest the citation or penalty in good faith, abatement and payment of penalty(ies) for those items contested are suspended until the Occupational Safety and Health Review Board reviews your case and issues a final order. The Review Board is an independent board and is not a part of OSHA. The final order of the Review Board will uphold, modify or eliminate the penalties. However, penalties for items not contested are still due within 15 working days. For further details, see the section on **How to Contest**. Payment should be made by certified check, personal check, company check, postal money order, bank draft or bank money order, payable to "DIR-OSHA". Please indicate the Inspection Number on the remittance.

OSHA does not agree to any restrictions or conditions or endorsements put on any check or money order for less than the full amount due, and will cash the check or money order as if these restrictions, conditions, or endorsements do not exist.

Informal Conference - Before deciding whether to file a "Notice of Contest", you may request an informal conference with the OSHA District Manager to discuss the Citation and Notification of Penalty. You may use this opportunity to:

* Obtain a better explanation of the violations cited;
* Obtain a more complete understanding of the specific standards which apply;
* Discuss ways to correct the violations;
* Discuss problems with the abatement dates;
* Discuss problems concerning employee safety practices;
* Resolve disputed citation(s) and penalty(ies) (thereby eliminating the need for the more formal procedures associated with litigation before the Review Board;
* Present any evidence or views which you believe would support an adjustment to the citation(s) and/or penalty(ies);
* Negotiate and enter into an Informal Settlement Agreement; and
* Obtain answers to any other questions you may have.

You are encouraged to take advantage of the opportunity to have an informal conference if you foresee any difficulties in complying with any part of the citation. **Please note, however, that an informal conference must be held within the 15-working-day Notice of Contest period and will neither extend the 15-working-day contest period nor take the place of the filing of a written notice if you desire to contest.** If you are considering a request for an informal conference to discuss any issues related to this Citation and Notification of Penalty, you must take care to schedule it early enough to allow time to contest after the informal conference, should you decide to do so. Please keep in mind that a written letter of intent to contest must be submitted to the District Manager within 15 working days of your receipt of this Citation. The running of this contest period is not interrupted by an informal conference. Employee representative(s) have the right to participate in any informal conference or negotiations between the District Manager and the employer. **To schedule an informal conference, please call (775) 824-4600.**

If you agree that the citation violations do exist, but you have a valid reason for wishing to extend the abatement date(s), you may discuss this with the District Manager in an informal conference. The District Manager may issue an amended citation which changes the abatement date prior to the expiration of the 15-working-day period without your filing a Notice of Contest.

If you do not contest within 15 working days, your citation will become a final order. After this occurs, the OSHA District Manager may continue to provide you with information and assistance on how to abate the hazards cited in your citation. However, the District Manager may not amend or change any citation or penalty which has become a final order. The District Manager may only advise you on abatement methods or extend the time you need to abate the violation (see requests for extensions and petition for modification of abatement).

If you decide to request an informal conference, please complete, remove and post the page 8 "Notice to Employees" next to this Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined. Be sure to bring to the conference any and all supporting documentation of existing conditions as well as any abatement steps taken thus far. If conditions warrant, the District Manager can enter into an informal settlement agreement which amicably resolves this matter without litigation or contest.

How to Contest - If you wish to contest any portion of a citation, you must submit a Notice of Contest in writing, by mail or fax, within 15 working days (excluding weekends and state holidays) after receipt of the NVOSHA-2. This applies even if you have stated your disagreement with a citation, penalty, or abatement date during a telephone conversation or an informal conference. **OSHA must receive your Notice of Contest by 5:00 P.M. (PST) on the 15th working day.** The notice must clearly state what is being contested--the citation or the

penalty, or any combination or these factors. In addition, the notice must state whether all violations on the citation, or just specific violations, are being contested, (For example, "I wish to contest the citation and penalty proposed for Items 3 and 4 of the citation issued March 31, 2012.").

Your contest must be made in good faith. A contest filed solely to avoid your responsibilities for abatement or payment of penalties will not be considered a good-faith contest. A proper contest of any item suspends your obligation to abate and pay until the item contested has been judicially resolved. If you contest only the penalty, you must still correct all violations by the dates indicated on the citation. If only some items of the citation are contested, the other items must be corrected by the abatement date and the corresponding penalties paid within 15 working days of notification.

After you file a Notice of Contest, your case is officially in litigation. If you wish to settle the case, you may contact the OSHA District Manager will give you the name of the OSHA attorney handling your case. All settlements of contested cases are negotiated between you and the OSHA attorney according to the rules of practice of the Nevada Occupational Safety and Health Review Board.

The Contest Process - If the Notice of Contest has been filed within the required 15 working days, the OSHA attorney will forward your case to the Nevada Occupational Safety and Health Review Board and the Board will schedule a hearing. Both employers and employees have the right to participate in this hearing which contains all the elements of a trial, including examination and cross-examination of witnesses. You may choose to represent yourself or be represented by an attorney. The Board may affirm, modify, or eliminate any contest item of the citation or penalty.

As with any other legal procedure, there is an appeals process. Once the Board has ruled, any party to the case may request a further review by the district court for the area in which the case arose.

Unless you inform the District Manager in writing that you intend to contest the citation(s) and/or proposed penalty(ies) within 15 working days after receipt, the citation(s) and the proposed penalty(ies) will become a final order of the Nevada Occupational Safety and Health Review Board and may not be reviewed by any court or agency.

Petition for Modification of Abatement Date - Abatement dates are assigned on the basis of the best information available at the time the citation is issued. If you are unable to meet an abatement date because of uncontrollable events or other circumstances, you may file a "Petition for Modification of Abatement" (PMA) with the District Manager.

The petition must be filed in writing with the District Manager who issued the citation on or before the original date set for the abatement. If the petition is filed later, it must be accompanied by the employer's statement of exceptional circumstances explaining the delay.

To show clearly that you have made a good faith effort to comply, the PMA must include all of the following information before OSHA considers it:

* A list of all steps taken by the employer in an effort to achieve compliance during the prescribed period for the abatement and the dates those steps were taken.
* The additional time necessary in order to achieve compliance.
* The reasons the additional time is necessary, such as, the unavailability of personnel, materials or equipment, or the inability to complete the necessary construction or alteration by the original date for abatement.

* All steps which are being taken to safeguard the employees against the cited hazard during the abatement period.
* A certified statement that a copy of the petition has been posted, and served on the representative of the employees, if they have a representative, and the date on which the posting and service was made.

You must post a copy of the petition in a conspicuous place where all affected employees will have notice of it or near the location where the violation occurred. The petition must remain posted for 10 working days. Where the affected employees have a representative, the employer must serve them with a copy of the petition.

Affected employees or their representative may file a written objection to a petition for a modification of the time for the abatement of a violation with the District Manager. Failure to file an objection within 10 working days after the date of posting the petition or service of it upon the representative of the employees, whichever is later, constitutes a waiver of any further right to object to the petition. The filing of an employee contest does not suspend the employer's obligation to abate.

If the affected employees or their representative objects to the petition, the District Manager shall consult with the Chief Administrative Officer (CAO) and the CAO will make a determination. The CAO will furnish to the employer and the affected employees or their representative a written notice of his decision and the reasons for it. The CAO's decision is final.

If the petition is uncontested upon the expiration of 15 working days after the date on which a copy of it was posted or served upon the representative of the employees, the District Manager may approve or deny the petition.

If the District Manager denies a petition for a modification of the time for the abatement of a violation, the employer may request an informal review by the CAO. After considering all written and oral statements presented, the CAO will affirm, modify or reverse the determination of the District Manager. The CAO's determination is final. Further information on PMAs may be obtained from the District Office.

Temporary and Permanent Variances - If you are unable to comply with a newly promulgated standard because of the unavailability of materials, equipment, or professional or technical personnel, you may apply to OSHA for a **temporary variance** from that standard.

To be eligible for a temporary variance, the employer must put into force an effective program for coming into compliance with the standard or regulation as quickly as possible. In the meantime, the employer must demonstrate to OSHA that all available steps are being taken to safeguard employees. A temporary variance may be granted to up to one year; and it can be renewed twice, each time for six months.

You may also apply for a **permanent variance** from a standard if you can prove that your present facilities or methods of operation are at least as safe and healthful as those required by the OSHA standard.

In making a determination on a permanent variance, OSHA reviews the employer's evidence and, where appropriate, arranges a visit to the workplace to confirm the circumstances of the application. If the request has merit, OSHA may grant a permanent variance. Final variance orders detail the employer's specific responsibilities and requirements and explain exactly how the employer's method varies from the OSHA requirement.

Please note, however, that whenever an employer applies for either a temporary or a permanent variance, the employer must inform employees of the application and of their right to request a hearing. You should contact the District Manager for procedures and documents for applications for variances.

Employer Discrimination Unlawful - The law prohibits employers from discharging or otherwise discriminating against an employee who has exercised any right under this law, including the right to make safety and health complaints or to request an OSHA inspection. OSHA will investigate complaints from employees who believe that they have been discriminated against. If the investigation discloses probable violations of employee rights, court action may follow. Employees who believe that they have been discriminated against must file their complaint within 30 days of the alleged act of discrimination to the District Office at the address shown on page 1.

Notice to Employees - The law gives an employee or his/her representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the OSHA District Office at the address shown on page 1 and postmarked within 15 working days (excluding weekends and legal holidays) of the receipt by the employer of this Citation and Notification of Penalty. **OSHA must receive your Notice of Contest, by fax or mail, by 5:00 P.M. Pacific Standard Time (PST) on the 15th day. The filing of an employee contest does not suspend the employer's obligation to abate.**

Follow-up Inspection and Failure to Abate - If you receive a citation, a follow-up inspection may be conducted to verify that you have done the following:

* Posted the citation as required;
* Corrected the violations as required in the citation; and/or
* Protected employees adequately and made appropriate progress in correcting hazards during multi-step or lengthy abatement periods.

To achieve abatement by the date set forth in the citation, it is important that abatement efforts be promptly initiated. In addition to providing for penalties for failure to post citations and failure to abate violations, the Act clearly states that you have a continuing responsibility to comply with the Act and assure your employees of safe and healthful working conditions. Any new violations discovered during a follow-up inspection will be cited.

Providing False Information - All information reported to OSHA by employers and employees must be accurate and truthful. Providing false information on efforts to abate cited conditions or in required records is punishable under the Act.

Additional Information - You should be aware that OSHA publishes information on its inspection and citation activity on the Internet under the provisions of the Electronic Freedom of Information Act. The information related to your inspection will be available 30 calendar days after the citation is issued. You are encouraged to review the information concerning your establishment at WWW.OSHA.GOV. For further information and assistance, please feel free to contact your District Manager.

NOTICE TO EMPLOYEES OF INFORMAL CONFERENCE

An informal conference has been scheduled with OSHA to discuss the citation(s) issued on 09/10/2013. The conference will be held at the OSHA office located at 4600 Kietzke Lane, Bldg. F-153, Reno, NV, 89502 on _____ at _____. Employees and/or representatives of employees have a right to attend an informal conference.

ABATEMENT CERTIFICATION

STATE OF NEVADA
Department of Business and Industry
Division of Industrial Relations
Occupational Safety and Health Administration
4600 Kietzke Ln., Bldg. F-153
Reno, NV 89502

SIERRA PACKING & CONVERTING LLC
11005 Stead Blvd
Reno, NV 89506

The hazard referenced in Inspection Number 317224608 for the violation identified as Citation ____, Item _____ was corrected on (date) _____ by the following actions:

_____.

The hazard referenced in Inspection Number 317224608 for the violation identified as Citation ____, Item _____ was corrected on (date) _____ by the following actions:

_____.

The hazard referenced in Inspection Number 317224608 for the violation identified as Citation ____, Item _____ was corrected on (date) _____ by the following actions:

_____.

The hazard referenced in Inspection Number 317224608 for the violation identified as Citation ____, Item _____ was corrected on (date) _____ by the following actions:

_____.

The hazard referenced in Inspection Number 317224608 for the violation identified as Citation ____, Item _____ was corrected on (date) _____ by the following actions:

_____.

I attest that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement activities described in this certification.

_____
Signature

_____
Typed or Printed Name

STATE OF NEVADA
Department of Business and Industry
Division of Industrial Relations

Occupational Safety and Health Administration
4600 Kietzke Lane, Bldg. F-153
Reno, NV 89502

Inspection Number: 317224608
Inspection Dates: 08/16/2013 - 08/19/2013
Issuance Date: 09/10/2013

Citation and Notification of Penalty

Company Name: SIERRA PACKING & CONVERTING LLC
Inspection Site: 11005 Stead Blvd, Reno, NV 89506

Citation 1 Item 1 Type of Violation: Serious

29 CFR 1910.132(f)(1)(iv): The employer shall provide training to each employee who is required by this section to use personal protective equipment (PPE). Each such employee shall be trained to know the limitations of the PPE:

Facility; employees used a fall arrest system consisting of a five point body harness, six foot lanyard with a three foot shock pack to access the top tier racking located 15 feet, 7 inches high. The lack of knowledge of the minimum required distance from a suitable anchorage point to ground exposed user to an unarrested fall of 15 feet, 7 inches.

Date By Which Violation Must be Abated:	10/13/2013
Proposed Penalty:	$ 3825.00

See pages 1 through 8 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.

STATE OF NEVADA
Department of Business and Industry
Division of Industrial Relations

Occupational Safety and Health Administration
4600 Kietzke Lane, Bldg. F-153
Reno, NV 89502

Inspection Number: 317224608
Inspection Dates: 08/16/2013 - 08/19/2013
Issuance Date: 09/10/2013

Citation and Notification of Penalty

Company Name: SIERRA PACKING & CONVERTING LLC
Inspection Site: 11005 Stead Blvd, Reno, NV 89506

Citation 2 Item 1 Type of Violation: Other

29 CFR 1910.132(d)(1): The employer shall assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of personal protective equipment (PPE):

Facility; an assessment of the workplace to determine if hazards were present and the personal protective equipment required for employees to use for protection against those hazards was not performed.

Date By Which Violation Must be Abated:	10/13/2013
Proposed Penalty:	$ 0.00

Chris C. Davis
District Manager Northern Nevada

See pages 1 through 8 of this Citation and Notification of Penalty for information on employer and employee rights and responsibilities.