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Hazard Identification & Risk Assessment						
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Authority and Scope

Authority: This Job Hazard Analysis (JHA) Plan is authorized by John Visconti.

Regulation: 29 CFR 1910.132(d) requires that Pannier Corporation assess the workplace to determine if the hazards that require the use of personal protective equipment (PPE), such as head, eye, face, hand, or foot protection, are present or are likely to be present. If hazards or the likelihood of hazards are found, Departmental Supervisors will select appropriate PPE and require that affected employees use properly fitted PPE suitable for protection from these hazards. In addition, Pannier Corporation will certify, in writing, that a workplace hazard assessment for PPE has been performed that identifies the workplace evaluated, the person certifying the evaluation, and the dates of the evaluation. Scope: This JHA applies to all Pannier Corporation personnel who may encounter health and safety hazards while performing their assigned work duties.

Policy Statement

Pannier Corporation is committed to providing for the occupational safety and health of personnel, preventing accidental loss of material resources (e.g., property damage), and avoiding interruptions to essential services resulting from accident and other incidents. An effective occupational safety and health program must include procedures to evaluate job hazards and to eliminate or control the related risks to employees or property. Although identification of possible property damage losses is important, the primary objective of a JHA is to identify the risk of injury associated with systems or equipment, a task or series of tasks, and to recommend solutions to reduce the risk to a standard or acceptable level.

A JHA facilitates the discovery and evaluation of hazards that exist in the workplace and the selection of control measures to reduce or eliminate the hazard. Once the hazards have been identified, an evaluation by technically qualified safety personnel will determine the priority for the establishment of appropriate control measures. Based on the potential severity and risk of injury or property damage, hazards will be promptly eliminated or controlled.

Plan Administration

Function	Name/Department	Contact Information
Plan Administrator	John Visconti	412-492-1400 ext. 310
Job Hazard Analyst	John Visconti	<mark>412-492-1400 ext. 310</mark>
Supervisor	Bob Barker	<mark>412-492-1400 ext. 315</mark>

Plan Administrator. The plan administrator will ensure that JHAs are conducted for all workplace activities, tasks, and projects in a timely manner, and will be responsible for maintaining certifications and other documentation related to JHAs.

Job Hazard Analyst. The responsibility for conducting JHAs rests with technically qualified safety personnel. Such personnel may be managers, supervisors, or consultants/contractors.

Supervisor. Supervisors and other applicable personnel will participate in JHAs.

Completed JHAs will be reviewed by the Health and Safety Director.

Plan Review and Update

JHAs will be reviewed **annually** and updated as needed to reflect changes in the work and/or worksite conditions, and when injury or illness incidents warrant a review. All employees affected by any changes in engineering controls or work procedures after a JHA review will be trained in the new job methods, procedures, or protective measures adopted.

Definitions

Activity--a named process, procedure, function, or task, or grouping of tasks, that occur(s) over time and has recognizable results.





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Job hazard analysis (JHA)--a technique that focuses on the relationship between the worker, the worker's activities or job task(s), the tools, and the work environment to identify hazards before accidents, injuries, or illnesses occur.

JHA Plan Overview

Activities Subject to JHA

A JHA will be conducted for each work project and activity. Part of the purpose of the JHA process is to determine whether hazards exist, through careful and regular examination of the location(s) and procedures involved in the project. The assumption that some work does not have potential for hazards to exist has led to unnecessary and costly injuries, such as cumulative trauma disorders, back injuries, and electrical shock. If there is a project or activity that truly has no potential for employees to be exposed to hazards, the JHA would demonstrate that.

Activity Selection

Personnel authorized by Plan Administrator to perform JHAs (i.e., JHA Analysts) will select the job(s), tasks, operations, or processes to be analyzed by reviewing:

- · Injury and illness data
- Near-miss reports
- New or modified work tasks, activities, or projects
- Employee safety process comments, surveys, and reports
- Regulatory requirements

Initial JHAs will be scheduled by priority starting with those that have the highest injury and illness rates as recorded in OSHA Form 300, Injury and Illness Log. Where accident or near-miss data are lacking, a review of the nature of the job and the equipment and/or materials being used will be conducted to help determine which jobs will receive a JHA. Employee participation in the JHA selection and implementation process will be encouraged and solicited. The analysis of methods to control hazards will incorporate regulatory requirements for each type of activity.

Employees' input in the JHA process will be collected and reviewed.

All job hazard Analysts will consider the potential for all types of physical, chemical, and atmospheric exposures, and the likelihood of accidents in their operations when determining the priorities.

JHA Uses

The primary use of a JHA is to identify and resolve safety issues before beginning a work activity or project. JHAs will also support other functions related to workplace safety and health, including:

- Cost projections
- Employee orientation
- Training needs determination
- Performance evaluation
- · Accident investigation

JHA Process





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A JHA is conducted in two basic steps:

1. Identify each potential hazard that might exist because of the characteristics of the worksite, the procedures, and/or tasks that are involved in that project.

2. Determine what action(s) must be taken to prevent exposure of employees to each hazard.

During each of these steps, the person(s) conducting the analysis will gather information from such resources as:

- Personal experience
- Jobsite observations
- Input from employees who will be working in the area or on the project affected by the JHA
- · People who have done similar work on other projects
- · Occupational safety and health specialists
- Material safety data sheets (MSDSs)
- Equipment manuals
- Equipment manufacturers' technical representatives
- Health and safety handbooks
- Existing health and safety plans and handbooks

NOTE: OSHA Publication 3071, Job Hazard Analysis, for useful examples of the level of detail needed in a JHA. The publication also contains descriptions of common workplace hazards.

JHA Procedures

Following are the specific JHA procedures, listed in the order that they will be performed. Example Job Hazard Analysis Form, for guidance in conducting a simple JHA.

1. List specific activities. Make a list of specific activities that will be performed by employees at a particular location (work area or jobsite), for the use of machines and equipment, or for a specific process or project. Where projects are very broad and involve diverse activities, conduct a JHA for each activity.

a. When a project or activity involves the same tasks and the same conditions over a wide range of work areas, a single job hazard analysis will suffice.

b. When an activity involves unique site characteristics or unusual equipment at a particular site, conduct a JHA that focuses on the site.

NOTE: The worksheets or certificates may be modified to the needs of the organization, provided the minimum information shown on the form is retained. Review the worksheet or certificate to ensure it is thorough, accurate, and that the task or activity is broken down into a sufficient number of steps.

2. List each potential hazard. Examine the hazards or potential hazards associated with each task or activity. Continue to use the worksheet or certificate used to list the specific tasks.





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a. Examine the location where the activities are or will be performed to determine if there are any apparent hazards, such as poor lighting, live electrical contacts, improperly stored materials or waste, adjacent operations that may affect the safe operation of the job under review, etc.

b. Interview appropriate personnel who are familiar with the job and/or equipment. The intent of the interviews is to determine the orderly sequence of job tasks and any perceived hazards.

c. Observe, where possible, employees performing the actual job tasks. Thoroughly document the findings on the JHA worksheet. Refer to <u>OSHA Publication 3071</u> for examples.

d. Review available literature associated with the particular activity for additional hazards, including MSDSs, equipment manuals, safety checklists, and existing health and safety plans and manuals.

3. List corrective controls. Once the hazards are identified, select the corrective controls that will be implemented to ensure employee safety and health, and list them on the appropriate worksheet or certificate. Corrective controls will be considered in the following order of precedence:

a. Elimination--removing the hazard or hazardous work practice from the workplace. This is the most effective control measure.

b. Substitution--substituting or replacing a hazard or hazardous work practice with a less hazardous one. For example, substitution of a less hazardous or toxic solvent for a highly flammable or carcinogenic solvent.

c. Engineering control--if the hazard cannot be eliminated or substituted, an engineering control is the next preferred measure. This may include modifications to tools or equipment, such as providing guards to machinery or equipment, or providing local exhaust or general ventilation to control emissions of toxic or hazardous gases, vapors, or particulates.

d. Isolation--isolating or separating the hazard or hazardous work practice from people not involved in the work or the general work areas. This can be done by marking off hazardous areas or by installing screens or barriers.

e. Administrative control--introducing work practices that reduce the exposure to workers. Some examples include limiting the amount of time a person is exposed to a particular hazard, demarcating exclusion areas and establishing physical access controls to prevent workers from entering hazardous areas, and ensuring proper training of employees.

f. Personal protective equipment--consider the use of PPE when other control measures are not feasible or as an interim control until one of the other described controls can be implemented.

4. Review and modify JHA as necessary. Repeat the JHA process, as necessary, by evaluating new equipment or work processes, reviewing accident records, and periodically reevaluating the suitability of previously selected PPE and/or engineering controls.

Implementation of Corrective Actions

Once the JHA has been conducted for each project or activity, corrective actions recommended in the JHA that are approved by management will be implemented. Supervisors will inform employees of the hazards and corrective actions, and conduct employee training before the commencement of related tasks.

JHA Training

Before any designated job hazard analyst, manager, supervisor, or other employee conducts or participates in a JHA, he or she will receive training in the JHA process. JHAs will be conducted by technically qualified safety personnel who have the experience and training to identify hazards in the workplace.

Documentation and Recordkeeping

All JHAs will be documented on the Job Hazard Analysis Worksheet or related assessment forms.



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JHA worksheets and certificates will be maintained by Pannier Corporation for minimum 3 years.

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Contractors

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A JHA conducted for Pannier Corporation employees does not necessarily address the work of a contractor or the contractor's employees; however, the JHA for a project or activity that involves Pannier Corporation employees working in an area affected by contract activities will address any hazards that such activities present for the Pannier Corporation employees.