

<b>Stericycle, Inc. Policy Manual</b>		<b>CONFIDENTIAL</b>		<b>Number:</b>	<b>PPE</b>	
<b>Subject:</b>	Personal Protective Equipment (PPE)			<b>Effective:</b>		
<b>Originator:</b>	Environmental Safety & Health			<b>Supersedes:</b>		
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## 1.0 PURPOSE

In addition to utilizing engineering controls and administrative controls to help reduce the risk of injury from hazards encountered in the workplace, all plant operation employees and transportation employees will be required to wear the appropriate personal protective equipment (PPE) in accordance with their job title/duty.

## 2.0 SCOPE

Applies to all operating Stericycle plant and transportation locations

## 3.0 REFERENCES

- 3.1 OSHA 29 CFR 1910 Subpart I - Personal Protective Equipment
- 3.2 Stericycle's Respiratory Protection Policy
- 3.3 Stericycle's Hearing Conservation Policy

## 4.0 DEFINITIONS

None

## 5.0 EQUIPMENT/MATERIALS

See Section 8.0

## 6.0 SAFETY EQUIPMENT

- 6.1 Personal Protective Equipment (PPE) for plant operation employees and transportation employees is dependent on the employee's specific job title. (See Exhibit 8. 1)
- 6.2 Personal Protective Equipment for office personnel and visitors who enter the plant includes at a minimum:
  - 6.2.1 Laboratory Coat
  - 6.2.2 Safety Glasses/Goggles
  - 6.2.3 Hearing Protection (required during plant production)
  - 6.2.4 N95 Respirator or equivalent

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## 7.0 Procedures

### 7.1 Hazard Assessment

- 7.1.1 The Environmental Safety & Health Department with input from the Area Regulatory Compliance Manager will conduct a Hazard Assessment by job title.
- 7.1.2 The Hazard Assessment will assess the workplace environment to determine the type of hazards that are present, or are likely to be present, that would require the use of Personal Protective Equipment (PPE). Specifically, each job title will be surveyed to identify sources of hazards (i.e., chemicals, impact, penetration, heat, harmful dust, etc.) to determine the appropriate PPE.
- 7.1.3 A written certification will be provided by Environmental Safety & Health to verify that each job title was assessed for workplace hazards. In conjunction with the hazard assessments, a Personal Protective Equipment chart will indicate by job title the PPE requirements.

### 7.2 Eye and Face Protection

- 7.2.1 All safety glasses, goggles and face shields MUST be in compliance with the American National Standards Institute (ANSI) Standard Z87.1-1989. The eye and/or face protection must be clearly marked with the ANSI compliance standard, (i.e., .1-1989) and distinctly marked to facilitate identification of the manufacturer.
- 7.2.2 Safety Glasses - The safety glasses purchased must have the following features:
- ANSI Z87.1-1989 Compliance
  - Clear lens for indoor use
  - Adjustable temple length to ensure proper fit
  - Wrap around frame (recommended for extra side protection)
  - No vented side shields
- 7.2.3 Goggles - The safety goggles purchased must have the following features:
- ANSI Z87.1-1989 Compliance
  - Clear lens for indoor use
  - Adjustable elastic strap to ensure proper fit
  - Non-vented or indirect vents
  - Fog free coating (recommended to help prevent fogging)

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7.2.4 Face Shield - The face shields purchased must have the following features:

- ANSI Z87.1-1989 Compliance
- Clear lens for indoor use
- 10 inch face shield height
- Wraparound shield (recommended for full coverage, i.e., covers the ears)
- Ratchet headband (recommended for quick and easy adjustments)
- Padded headband (recommended for comfort)

7.2.5 Prescription Eye Protection - Employees whose vision requires the use of corrective lenses and are required by this policy to wear safety glasses will be provided the following options:

- Protective eyewear (glasses/goggles) that are designed to wear over prescription eyewear and meet the aforementioned requirements/recommendations under sections 7.2.2 and 7.2.3; **OR**
- Safety glasses in which the safety frame allows the employee to have their local optician fill the frame with appropriate safety prescription lens (example prescription safety frames can be found in Lab Safety catalog. **BOTH THE FRAME AND THE PRESCRIPTION LENS MUST MEET ANSI Z87.1-1989 AND OSHA COMPLIANCE.**

### 7.3 Foot Protection

7.3.1 All safety boots **MUST** have compliance with the American National Standards Institute (ANSI Standard Z41.1991).

7.3.2 Safety boots purchased must have the following features:

- Steel toed
- Steel mid-sole required for ANY employee who enters into the processing area (i.e., pressroom or pit). A steel mid-sole is highly recommended for all other job titles and should be incorporated into the system as safety boots are replaced.
- Impervious to liquids (This may be accomplished with "leather" boots IF treated to be made impervious to liquids using a commercial product such as silicone spray once a week. Boots shall be properly cleaned and disinfected as required before they are sprayed with the commercial product.)

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## 7.4 Hand Protection

7.4.1 Impervious Work Glove - The following glove requirements will be utilized for protection from abrasions, punctures and liquids:

Example:

- Ansell Edmont "Golden Grab-It" gloves. This glove may be purchased with a knit wrist or a safety cuff.
- Ansel Edmont "Hycron" gloves or equivalent. This glove may be purchased fully coated with a knit wrist or fully coated with a safety cuff and palm coated with a safety cuff and a rough finish for better "gripping".

7.4.1.1 Impervious Gloves - The impervious gloves purchased must have the following features:

- Impervious neoprene or synthetic rubber
- 18 inch length for protection past the elbow (gauntlet)
- Minimum .022 inch gauge (related to glove thickness)
- Rolled cuff (recommended to prevent liquid contact with skin)
- Rough finish (recommended for gripping)

7.4.1.2 Puncture Resistant Glove - The following glove will be utilized by employees working in the processing enclosure area (i.e. clearing the system) for protection from abrasions and punctures. **A resistant latex glove will be worn under the puncture resistant glove to protect an employee from potentially infectious fluids.**

Example:

- The puncture resistant glove is manufactured by Wells Lamont. The gloves may be purchased as a full back leather glove with a safety cuff or a 3/4 leather back glove with a safety cuff.

## 7.5 Other Protective Equipment

7.5.1 Aprons - the aprons purchased must have the following features:

- Impervious to liquids
- Length past an employee's knees for protection
- Minimum 8 mil in thickness

7.5.2 Sleeve Protectors - the sleeve protectors purchased must have the following features:

- Impervious to liquids
- Length from the employees wrist to the elbow
- Elastic at each end to hold the sleeve in place

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7.5.3 Protective Suit - the protective suits purchased must have the following features:

- Full body coverall with fluid resistance (i.e., lightweight tyvek)
- Elastic sleeves at the wrist to prevent dust/debris from “falling” into the protective suit
- Protective hood if suit is being worn with a tight fitting airline respirator as opposed to a respirator hood

## 7.6 Defective Personal Protective Equipment

7.6.1 Defective personal protective equipment (i.e., cracks, holes, wear and tear) will not be considered appropriate protection and must be immediately turned into supervisory personnel by the employee to be re-issued proper PPE.

## 7.7 Training

7.7.1 The following training topics will be covered during employee training by Environmental Safety & Health or designee:

- When Personal Protective Equipment (PPE) is necessary
- What PPE is necessary
- How to properly don (put on), doff (take off), adjust, and wear PPE
- Limitations of PPE
- Procedures related to proper PPE care, cleaning and disinfection, maintenance/repair, useful life and disposal of PPE

7.7.2 Employees required to wear PPE will need to demonstrate during training an understanding of the aforementioned training topics and the ability to properly use the PPE issued.

7.7.3 Training will be performed initially, when there are changes in the PPE requirements, and annually.

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8.0 Exhibits

- Exhibit 8.1 Required Plant Personal Protective Equipment Chart
- Exhibit 8.2 Certified Hazard Assessments by Job Title
- Exhibit 8.3 Hazard Assessment Determination by Job Title
- Exhibit 8.4 Hazard Assessment Survey Guidelines
- Exhibit 8.5 Training Certification
- Exhibit 8.6 Training Summary Sheet

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Exhibit 8.1

**Stericycle, Inc. - Minimum Personal Protective Equipment Requirements**

Job Title	Imperv Work Gloves	Imperv Gloves	Punct. Resist. Gloves	Safety Glasses/Goggles	Faceshield	Imperv. Apron	Prot. Sleeves	Prot. Suit	Safety Boots	Safety Harness	Ear Plugs <sup>4</sup>	Dust/Mist Mask <sup>7</sup>	Air-Line Respirator or Hood <sup>7,8</sup>	Lab Coat
Truck Unloader	X			X		X	X		X		X			
Feed Oper.	X		X <sup>2</sup>	X <sup>3</sup>	X	X	X		X	X	X <sup>5</sup>			
RF Oper.	X			X					X		X			
Baler/Dumper	X			X					X		X	X		
Grinder Oper.	X				X			X	X		X	X		X
Autoclave Oper.	X			X		X	X		X		X			
Press Oper.	X		X <sup>2</sup>					X	X		X <sup>5</sup>		X	
Wash Tub		X			X	X			X		X			
Wash Tub Quality Control	X <sup>1</sup>			X					X		X			
Supervision <sup>9</sup>				X					X		X			
Maintenance <sup>9</sup>				X					X		X			
Drivers	X			X					X		X <sup>6</sup>			
Operator	X <sup>1</sup>			X					X		X			
Assistant Oper.	X			X					X		X			
Sanitarian <sup>9</sup>				X					X		X			
Visitors				X					X		X	X		X

- 1 Wash Tub Quality Control employee may wear a glove of choice (includes surgical gloves); Operator may wear impervious surgical gloves
- 2 Puncture resistant gloves must be worn, over impervious latex gloves, by all employees working in the processing containment area (i.e. clearing the system)
- 3 Safety glasses/goggles are optional for the Feed Operator and Tub Washer
- 4 Refer to Stericycle's Hearing Conservation Policy
- 5 Hearing protection may be achieved through radio headsets
- 6 Drivers must wear earplugs in the plant during production
- 7 Refer to Stericycle's Respiratory Protection Policy
- 8 Negative pressure HEPA filtered respirators may be worn in the processing area, AFTER it has been completely cleaned and disinfected
- 9 Employees must wear appropriate protective equipment in accordance with each job performed and each specific site

NOTE: Back supports are recommended but not required and are optional to all plant employees

All uniforms/PPE shall be changed on a daily basis and shall remain on-site.

All PPE must be left in Plant/Lockers as appropriate.

\* Visitors/others must wear safety glasses/goggles, laboratory coat, and hearing protection during plant production

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Exhibit 8.2

Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Truck Unloader

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Feed Operator

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: RF Operator

Inspector's Name:

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Exhibit 8.2

Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Baler/Dumper

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title:     Grinder Operator

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Autoclave Operator

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Press Operator

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
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Job Title: Tub Washer

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
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Job Title: Wash Tub Quality Control

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Supervisory Personnel

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
Operating Plant Locations

Job Title: Maintenance

Inspector's Name:

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Certification of Hazard Assessment

Stericycle, Inc.  
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Job Title: Truck Driver

Inspector's Name:

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Exhibit 8.3

Hazard Assessment Determination by job Title

Truck Unloader

**Task:** To orderly and safely unload trailer, lifting sealed plastic containers and boxes containing infectious medical waste, placing the containers on a hand truck and transporting to a conveyor, loading clean containers onto trailer, and housekeeping and sanitizing trailers/potential spill clean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids/materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Safety Glasses/Goggles - potential exposure to splashing/splattering of infectious liquids/materials, potential exposure to flying objects/debris from handling containers.

Impervious Apron - potential exposure to infectious liquids/materials from handling containers.

Protective Sleeves - potential exposure to infectious liquids/materials from handling containers.

Impervious Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Feed Operator

**Task:** To orderly and safely weigh the containers of infectious medical waste, remove the container's lid, dump the containers contents into the processing system, and housekeeping of feed station area/potential spill dean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids/materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Faceshield - potential exposure to splattering/spraying of infectious liquids/materials from handling containers.

Impervious Apron - potential exposure to infectious liquids/materials from handling containers.

Protective Sleeves - potential exposure to infectious liquids/materials from handling containers.

Impervious Steel Mid-Sole Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers), punctures (i.e., working in the pit area).

Safety Harness - potential protection from falling between the feed station and processing system.

Hearing Protection - potential exposure to noise levels at or above.85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment-Determination by Job Title

RF Operator

**Task:** To orderly and safely operate the unit that heats the contaminated waste to a sterilizing temperature, monitors processing time and temperature requirements, and housekeeping unit and surrounding area /potential spill clean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids/ materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Safety Glasses/Goggles - potential exposure to splashing/splattering of infectious liquids/materials, potential exposure to flying objects/debris from handling containers.

Impervious Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Baler/Dumper

**Task:** To orderly and safely operate a forklift truck and bale or dump treated product, housekeeping of bale/dump area/potential spill clean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids/ materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Safety Glasses/Goggles - potential exposure to splashing/splattering of infectious liquids/materials, potential exposure to flying objects/debris from handling containers.

Impervious Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne dust/debris from baling or dumping treated product.

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Exhibit 8.3  
Hazard Assessment Determination by Job Title

Press Room Operator

**Task:** To orderly and safely operate the unit that compacts the contaminated waste into processing vessels, place lid on full process vessels, and housekeeping of press room/potential spiff dean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids/ materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Protective Suit - potential exposure to infectious liquids/materials and dust/debris.

Impervious Steel Mid-Sole Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers), punctures (i.e., working in the press room/pit area).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Airline Respirator/or Hood - potential exposure to dust/debris and unknown contaminants.



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Exhibit 8.3

Hazard Assessment Determination by Job Title

Tub Washer

**Task:** To orderly and safely operate the unit that sanitizes and washes containers, removal of existing labels, and housekeeping of wash tub area/potential spill dean-up.

**Required PPE:** Impervious Gloves - potential exposure to infectious liquids/materials and hot (i.e., 180° F) water/steam.

Faceshield - potential exposure to splattering/spraying of infectious liquids/materials from handling containers.

Impervious Apron - potential exposure to infectious liquids/materials from handling containers.

Impervious Safety Boots - potential exposure to infectious liquids/ materials, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3  
Hazard Assessment Determination by Job Title

Wash Tub Quality Control

**Task:** To orderly and safely remove existing labels/replace labels, stack and load clean containers into trailer, and housekeeping of wash tub area/potential spill clean-up.

**Required PPE:** Glove of Choice - potential exposure to general abrasions from handling plastic containers.

Safety Glasses/Goggles - primary protection from potential exposure to flying objects/debris.

Impervious Safety Boots - potential exposure to water, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Supervision

Task: To orderly and safely supervise the production floor.

Required PPE: Safety Glasses/Goggles - primary protection from potential exposure to flying objects/debris.

Impervious Steel Mid-Sole Safety Boots - potential exposure to infectious liquids/materials, fall objects (i.e., containers), punctures (i.e., working in the press room/pit area).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Maintenance

**Task:** To orderly and safely perform preventative and general maintenance duties.

**Required PPE:** Safety Glasses/Goggles - potential exposure to infectious liquids/materials, flying objects/debris.

Impervious Steel Mid-Sole Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers), punctures (i.e., working in the press room/pit area).

Hearing Protection - potential exposure to noise levels at or above 85 decibels during plant production.

Dust/Mist Mask - potential exposure to airborne contaminants.

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### Exhibit 8.3

#### Hazard Assessment Determination by Job Title

##### Drivers

**Task:** Transport medical waste to designated area after loading from customer facilities onto trailers or trucks. The loading process involves the use of a hand truck and physical handling of medical waste containers. May be involved with spill dean-up.

**Required PPE:** Water Resistant Work Gloves - potential exposure to infectious liquids/materials, and recommended by American Industrial Hygiene Association for abrasion-resistance, cut-resistance, puncture-resistance, dry grip, flexibility, wet grip.

Protective Eyewear - potential exposure to splashing/splattering of infectious liquids/materials, potential exposure to flying objects/debris from handling containers.

Water Resistant Safety Boots - potential exposure to infectious liquids/materials, falling objects (i.e., containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels when in plant during production.

Dust/Mist Mask - potential exposure to airborne contaminants when in plant.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Sanitarian

**Task:** To orderly and safely perform general housekeeping, clean all surfaces within the facility excluding the pit and pressroom, laundry and spill clean-up.

**Required PPE:** Impervious Work Gloves - potential exposure to infectious liquids (see Truck Unloader for remainder).

Safety Glasses/Goggles - potential exposure to splashing/splattering of infectious liquids/materials, potential exposure to flying objects/debris from handling containers.

Impervious Safety Boots - potential exposure to infectious liquids/materials, falling objects, (i.e. containers).

Hearing Protection - potential exposure to noise levels at or above 85 decibels.

Dust/Mist Mask - potential exposure to airborne contaminants.

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Exhibit 8.3

Hazard Assessment Determination by Job Title

Visitors/Others

**Task:** To observe operations on the production floor.

**Required PPE:** Protective Eyewear - primary protection from potential exposure to flying objects/debris.

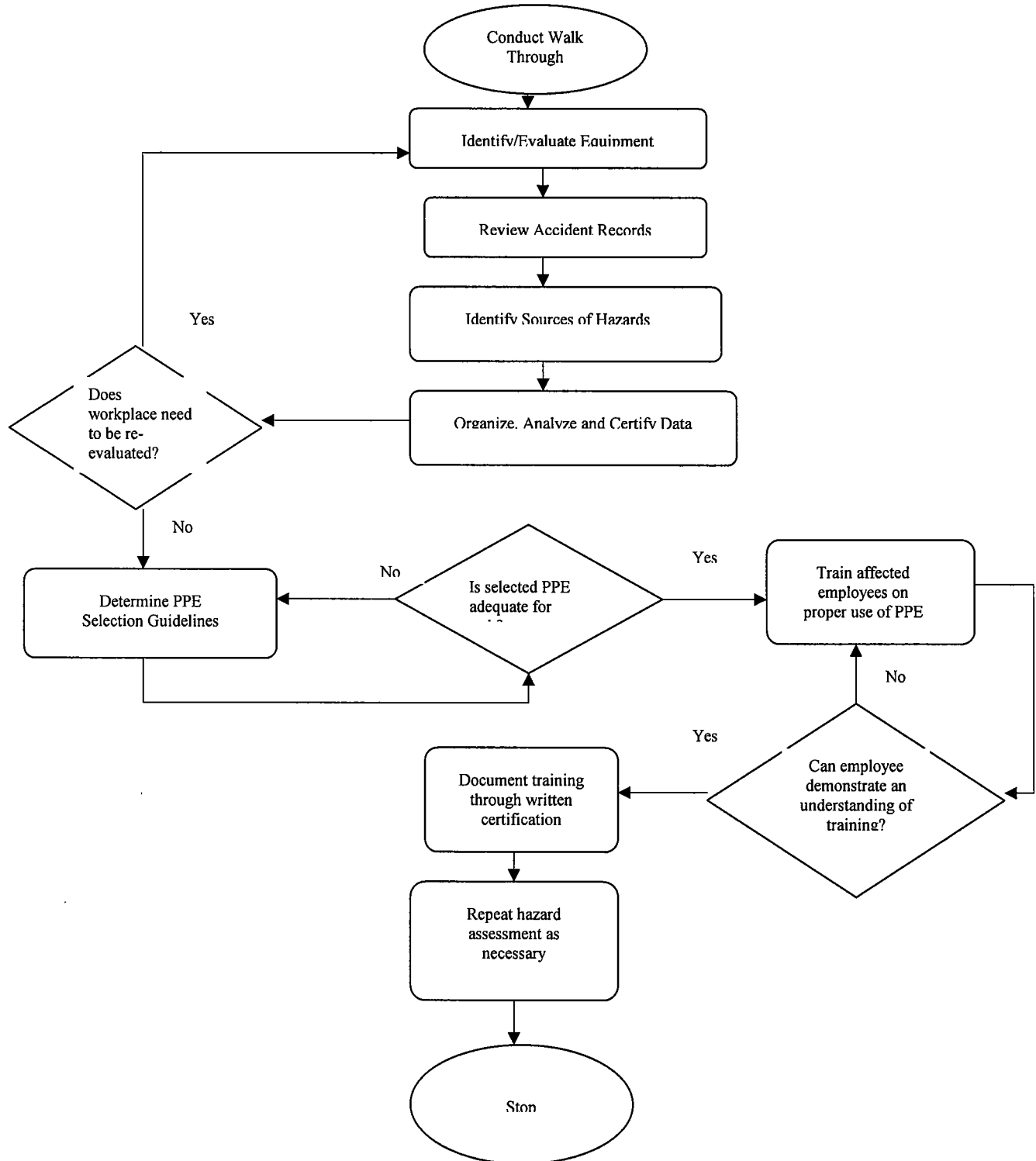
Laboratory Coat - potential exposure to general contamination, dust/debris.

Hearing Protection - potential exposure to noise levels at or above 85 decibels during plant production.

Dust/Mist Mask - potential exposure to airborne contaminants.

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**Exhibit 8.4  
Hazard Assessment Survey Guideline**







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### Exhibit 8.6

#### Personal Protective Equipment Training Summary

1. When PPE is necessary:

PPE will be required in accordance with the PPE policy by job title at all times when an employee is on the plant production floor.

2. What PPE is necessary:

- Review of each job title and the minimum required PPE
- Refer to the Plant Personal Protective Equipment Chart
- Provide each employee a copy of the current PPE Chart and inform employees where they can find the PPE Chart within the facility for reference purposes

3. How to properly don, doff, adjust, and wear required PPE

Instructor will demonstrate how to put on, adjust, wear and take off each type of required PPE

4. Limitations of PPE

- The limitations of each type of required PPE will be discussed relating to their ability to protect an employee from the hazards encountered within the work environment.
- The hazards discussed will include, but will not be limited to: Bloodborne Pathogens, chemical hazards, foot hazards, temperature hazards, fan hazards, respiratory hazards, noise hazards

5. Proper care of PPE

- Personal Protective Equipment storage locations
- Proper storage procedures for PPE to prevent damage
- Work practice control of leaving PPE at the work site

6. Proper Cleaning and Disinfection of PPE

- Discuss proper ways to clean and disinfect (i.e., bleach/water solution) each type of required PPE
- Work practice control of issuing PPE to specific employees and daily cleaning/disinfecting requirements for issued PPE

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7. Useful Life and Proper Maintenance/Repair

- Discuss each type of required PPE and how long each type of PPE will last within the work environment compared to the hazards encountered
- Discuss the ability to repair each type of PPE compared to PPE that should be considered disposable at all times

8. Disposal of PPE

Procedures to properly dispose of each type of required PPE

9. Defective PPE

Discuss possible defects related to each type of required PPE (i.e., holes, cracks, wear & tear, etc.) and the policy of not wearing the PPE and providing the PPE to supervisory personnel for proper replacement

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## 1.0 PURPOSE

It is Stericycle's policy to fully investigate any accident involving company personnel and/or vehicles. The procedures described define the systematic approach that will be used to establish and document accident investigation reporting process.

## 2.0 SCOPE

2.1 All accidents and incidents involving employees and company vehicles should be investigated and findings documented. This policy does not supercede regulatory requirements or those policies currently in place at the facility. Should a change be made to an existing policy this policy is to take effect.

## 3.0 REFERENCE

3.1 DOT Regulations  
National Safety Council  
OSHA 1910  
WISHA Standards  
ANSI Z16.5 Incident Surveillance

## 4.0 APPENDIX

4.1 Appendices are to be used as guidance and as part of preparing the reports.

- 4.1.1 A. First Report of Injury Form
- 4.1.2 B. Fleet insurance carrier's Automobile Loss
- 4.1.3 C. Stericycle's Employee's Report of Injury
- 4.1.4 D. Stericycle's Accident Investigation report form
- 4.1.5 E. 7 -Step Accident Procedure (Fleet) Keller
- 4.1.6 F. Accident Preventability Criteria (National Safety Council)

## 5.0 DEFINITIONS

5.1 **Motor Vehicle Accidents:** Any occurrence involving the operation of an owned or non-owned vehicle that results in death, injury or property damage.

5.2 **Accident:** Any unplanned event that results in personal injury or in property damage.

5.3 **Incident:** An undesired event that under slightly different circumstances could have resulted in personal harm or property damage; any undesired loss of resources.

5.4 **Preventable Accident:** A preventable accident is any occurrence involving a company owned or operated vehicle that results in property damage and/or personal injury regardless of who was injured, what property was damaged, to

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what extent or where it occurred, in which the driver in question failed to exercise every reasonable precaution to prevent the occurrence.

## 6.0 EQUIPMENT

Accident reporting kits including appropriate forms and camera will be needed to properly document the investigation findings and results for all auto accidents.  
Accident investigation forms and camera for all injury accidents.

## 7.0 SAFETY REQUIREMENT

7.1 Appropriate and required personal protective equipment should be used during the investigation process at all times.

## 8.0 PROCEDURE

8.1 Accident Investigation Procedures

8.2 When an accident occurs it is in our best interest to discover exactly what happened and why it happened.

8.3 The accident investigation should:

8.3.1 Determine how severe the accident is,

8.3.2 Gather the relevant facts and circumstances surrounding the accident,

8.3.3 Identify the root cause or causes of the accident,

8.3.4 Determine recommendations to address or eliminate the root cause or causes.

8.4 Once the investigation is completed, implement the corrective action recommendations to prevent recurrence.

8.5 The supervisor/lead person will be assigned the duty of ensuring the Accident investigation is initiated and completed in a timely manner.

8.6 Basic accident facts should be gathered including answering the important questions of Who, Where, What, When, How, and Why. The objective of the investigation is fact-finding **not** fault finding.

8.7 Witnesses should be interviewed to get their perspective of these same questions.

8.8 The Accident Investigation Report form should be completed in detail.

8.9 Basic causes, (personal factors, management safety policies and procedures, environmental factors,) Indirect Causes (unsafe acts, unsafe conditions) and Direct Causes, (hazardous materials, unplanned release of energy,) should be determined and examined for recommendations to prevent recurrence.

8.10 Recommendations to prevent recurrence are a primary goal of any accident investigation and should be developed and implemented through the investigation team.

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9.0 DISCIPLINARY ACTION AND PREVENTABLE ACCIDENTS

Stericycle believes strongly that accident investigation begins right at the accident scene. Especially with regard to auto accidents there are certain driver responsibilities that must be carried out at the scene. Our policy is that any driver who leaves the scene of an accident without permission from an authorized company official or without due cause may be subject to disciplinary action up to and including termination, depending on circumstances involved.

When any employee reports an accident or injury, a review panel will determine whether the accident/injury was preventable by the individual involved. The three-person panel will include ESH representative, and may include supervisor, lead employee, district manager and others.

As part of the accident investigation the ESH manager must identify and record how many preventable accidents and or injuries an individual has had and report them to the District Manager. The District Manager must use the Repeater Policy to determine the appropriate disciplinary action to be taken.

All findings may be appealed to the Area Vice President and Human Resources in writing.

\_\_\_\_\_  
Reviewed/Approved

\_\_\_\_\_  
Date

Company:	Stericycle, Inc.							Print Date / Time:	8/29/2004
									7:43:20 PM
<b>Company Compliance Requirements - DRIVER</b>									
Job Requirement(s)									
Category	Requirement	Category	Compliance Requirement(s)	Requirement	Frequency				
Job Qualifications	Must Carry Commercial Drivers License	Driving		Annual Review of MVR / Driving Record	Every Year				
				DOT Employment Application	Pre-employment				
				DOT Medical Examiners Certificate	Expiration Date				
				DOT Past Employer Inquiry	Pre-employment				
				Drivers Certification of Violations/Suspension	Every Year				
				MVR/Driving Record Copy	Every Year				
				Road/Driving Test	Pre-employment				
				Single License Certificate	Pre-employment				
				Valid CDL (all classes)	Expiration Date				
		Training		Hours of Service	Every Year				
				Vehicle Condition Reports - VCRs	Every 3 Years				
	Operates a Vehicle > than 26,001 lbs	Medical		DOT Substance Abuse Testing	Pre-employment				
Employee Groups	Driver	Training		DOT Alcohol/Controlled Substance Abuse - Drivers	Within 10 Days Of Hire Date				
		Driving		Annual Review of MVR / Driving Record	Every Year				
				DOT Employment Application	Pre-employment				
				DOT Medical Examiners Certificate	Expiration Date				
				DOT Past Employer Inquiry	Pre-employment				
				Drivers Certification of Violations/Suspension	Every Year				
				MVR/Driving Record Copy	Every Year				
				Photo Copy of Drivers License	Pre-employment				
				Road/Driving Test	Pre-employment				
				Valid License	Expiration Date				
		Medical		Blood Work	Pre-Placement				
				Hepatitis C Status	Pre-Placement				
				Hepatitis Immunity	Within 270 Days Of Hire				
				Physical Exam/History	Every 2 Years				
				Urinalysis	Pre-Placement				
				Access to Exposure and Medical Records	Every 2 Years				
		Training			Every Year				
				Accident and Injury Reporting Requirements	Within 90 Days Of Hire Date				
					Every Year				
				Backing Procedures	Within 10 Days Of Hire Date				
				Bloodborne Pathogens	Every Year				
				DOT Hazardous Materials	Every Year				
					Within 10 Days Of Hire Date				
					Every 3 Years				

			Emergency Action Plans						Within 90 Days Of Hire Date
									Every Year
			Fire Extinguishers - Portable						Within 30 Days Of Hire Date
			Hazard Communication						Every Year
									Every Year
									Within 10 Days Of Hire Date
			Lockout/Tagout Control Haz Energy - Affected						Within 10 Days Of Hire Date
			Permit Required Confined Spaces - Affected						Within 10 Days Of Hire Date
			Personal Protective Equipment - PPE						Every Year
									Within 10 Days Of Hire Date
			Proper Lifting						Every Year
									Within 30 Days Of Hire Date
			Slip, Trip, Fall or Walking/Working Surfaces						Every Year
									Within 30 Days Of Hire Date
			Spill Response						Every Year
			Vehicle Condition Reports - VCRs						Every 3 Years
			Waste Acceptance Protocol						Every 2 Years



**Stericycle of Washington, Inc.**  
**Kent WA, Facility (ies)**  
**WRITTEN HAZARD COMMUNICATION PLAN**

**A. ADMINISTRATION:**

All aspects of this plan will be administered by, and the responsibility of, the individuals listed below. This plan will be periodically updated to reflect changes in management so that administration of this plan remains active. The administrator(s) below will be referred to as Hazard Communication Administrators (HCA).

Chris Dunn	Transportation Manager
Michael Philpott	District Manager
Chris Stromerson	AMESH

**B. ORDERING WORKPLACE CHEMICALS:**

Only specific individuals identified as approved purchasers will be allowed to order workplace chemicals. These individuals include the afore-mentioned HCA as well as operational employees delegated by the HCA as approved purchasers. These approved purchasers will assume the responsibility for ensuring that all necessary product information is received regarding the chemicals, which they order. This information includes proper labels and Material Safety Data Sheets (MSDS).

**C. RECEIVING WORKPLACE CHEMICALS:**

Approved purchasers will assume the responsibility for insuring that ordered workplace chemicals have been received. Approved purchasers will also ensure that all necessary product information is received regarding the chemicals, which they order. This information includes proper labels and Material Safety Data Sheets (MSDS).

**D. LABELING WORKPLACE CHEMICALS:**

1. The HCA will ensure that each container of hazardous chemicals is labeled with the following information:
  - i. The identity of the hazardous chemical(s) contained therein.
  - ii. Appropriate hazard warnings, or alternatively, words, pictures, symbols, or a combination thereof, which provide at least general information regarding the hazards of the chemicals, and which, in conjunction with the other information immediately available to employees under the hazard communication program, will provide employees with the specific information regarding the physical and health hazards of the hazardous chemical.

2. All containers of chemical products received for storage or use on site must be labeled. The responsibility for labeling commercial products rests with either the manufacturer or the distributor. Approved purchasers will check all incoming chemical product containers for proper labels. If proper labels are not found, the shipment will be rejected unless the Facility has sufficient information to label the containers themselves.
3. During routine facility inspections all tanks and containers used to store chemical products will be inspected for proper labeling.
4. When new information on a product is apparent to the HCA, new labels reflecting this information will be prepared, or requested from the product manufacturer, and affixed to the appropriate container as soon as possible.

**E. MATERIAL SAFETY DATA SHEETS & CHEMICAL INVENTORY LIST:**

1. Material Safety Data Sheets (MSDS) will be obtained for all hazardous chemical products used at the facility. The HCA will be responsible for maintaining the MSDS.
2. MSDS will be kept at the facility in a location where they will be accessible to all employees during all work shifts, in a binder large enough for all MSDS. The MSDS station is located at the top of the plant stairs into the office.
3. When the Facility begins use of a new hazardous chemical product, or the MSDS has changed (i.e. the product manufacturer has revised the MSDS) for a product already in use at the Facility, the HCA will obtain a new MSDS for the product and place it in the MSDS binder.
4. In the absence of MSDS's, an inventory of chemical products currently located at the Facility will be compiled in the form of the Chemical Inventory List (CIL) database.
5. If the use of a chemical product is discontinued at the Facility, the MSDS for the product will be maintained for exposure record purposes.
6. The Facility must keep current the MSDS inventory and / or the CIL current. Each form of record keeping must be retained for 30 years, as required by 29 CFR 1910.20 "Access to Employee Exposure and Medical Records." The MSDS and/or CIL is considered part of an employee's exposure record and must be maintained for 30 years.

**F. TRAINING:**

1. Initial training on Hazard Communication / Employee Right-To-Know will be a formal classroom format and may consist of a formal training outline available through the Environmental Safety and Health Department. All employees must receive training outlined as follows:
  - i. Information on the requirements of this regulation.
  - ii. The physical and health hazards of chemicals in the workplace.
  - iii. Methods employees can use to protect themselves, such as work practices, engineering controls and personal protective equipment.
  - iv. A review and explanation of MSDS.
  - v. How to read and interpret information on labels.
  - vi. Information on where the written Hazard Communication Program, the MSDS, and/or the CIL are kept.
  - vii. Information on operations and tasks in the employees' work area where hazardous substances are kept.
  - viii. Methods and observations that may be used to detect the presence or release of a hazardous chemical in the workplace.
2. Additional training will be provided to employees within certain job classifications where there is a need to know about certain chemical products used on the job, about work practices, use of personal protective equipment, or site emergency procedures. The specific training will vary depending on the job duties that each employee or employee group performs.
3. Training records will be maintained on file for each employee at the Facility.
4. Prior to new employees working with a hazardous chemical on the job, they will receive training on the dangerous properties of the chemical product, the potential hazards that might result from its use on the job, proper handling procedures and work practices, and where additional information about the product can be obtained.

5. Whenever a new physical or health hazard which employees have not previously been trained about is introduced into the workplace, affected employees will be trained on the dangerous properties of a chemical product, the potential hazards that might result from its use on the job, proper handling procedures and work practices, and where additional information about the hazard can be obtained.
6. Approved purchasers will be trained on the duties they are responsible for as outlined in sections B, C, and D above.
7. Informal, undocumented interviews may be utilized as necessary to test employee knowledge.
8. Training may be conducted by the HCA or a qualified trainer designated by the HCA.

**G. ON-SITE CONTRACTORS:**

1. Contractors who are to perform work at the Facility will receive Hazard Communication / Right-To-Know training where it is reasonably foreseen that the contractor's employees may be exposed to hazards created by Stericycle on-site activities.
2. The training will consist of providing the contractor's on-site supervisor with verbal instructions (and as needed, written confirmation) of potential physical and health hazards at the Facility, methods of avoiding those hazards if possible, and the location of information such as labels and MSDS relating to specific hazards which contractors reasonably may be exposed to during their time on-site.

Operations Manager

Date

District Manager

Date

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<b>Subject:</b>	Hazard Communication		<b>Effective:</b>	01/01/02		
<b>Originator:</b>	Regulatory Affairs		<b>Supersedes:</b>	10/30/01		
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## 1.0 PURPOSE

To provide information to employees regarding hazardous chemicals in the work area.

## 2.0 SCOPE

Information concerning the hazards of chemicals used in the workplace will be communicated to employees by means of a comprehensive hazard communication program, which includes container labeling and other forms of warning, material safety data sheets (MSDS), and employee training.

## 3.0 REFERENCES

WISHA WAC 296-800-170  
OSHA 29 CFR 1910.1200

## 4.0 DEFINITIONS

**Carcinogen:** A chemical that causes cancer. A chemical that is regulated by OSHA as a carcinogen; designated as a carcinogen or potential carcinogen by the International Agency for Research on Cancer (IARC), or listed as a carcinogen or potential carcinogen by the National Toxicology Program (NTP).

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

**Corrosive.** A chemical that causes visible destruction of, or irreversible alterations in, living tissue.

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

**Flammable aerosol:** An aerosol that yields a flame projection exceeding 18 inches at full valve opening or a flashback at any degree of valve opening, when tested by the method described in 16 CFR 1500.45.

**Flammable gas:** A gas that forms a flammable mixture in ambient air of 13 percent by volume or less or that forms a range of flammable mixtures in ambient air, wider than 12 percent of volume, regardless of the lower limit.

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**Flammable liquid:** A liquid having a flash point below 100° F (37.8° C), except any mixture having components with flash points of 100° F (37.8° C) or higher, the total of which makes up 99 percent or more of the total volume of the mixture.

**Flammable solid.** A solid that is likely to cause fire through friction, absorption of moisture, spontaneous chemical change, or retained heat from manufacturing or processing, or that can be ignited readily and when ignited burns vigorously and persistently creating a serious hazard.

**Hazard warning.-** Words, pictures, symbols, or a combination thereof appearing on a label or other appropriate form of warning that convey the hazards of the chemicals) in the container.

**Hazardous chemical:** Any chemical that is a physical or health hazard.

**Health hazard.** A chemical for which there is statistically significant evidence based on at least one study conducted in accordance with established scientific principles that acute or chronic health effects may occur in exposed employees. The term *health hazard* includes chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, neurotoxins, agents that act on the hematopoietic system, and agents that damage the lungs, skin, eyes or mucous membranes.

**Highly toxic:** A chemical falling within the following categories:

- A chemical that has a median lethal dose (LD50) of 50 milligrams or less per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
- A chemical that has a median lethal dose (LD50) of 200 milligrams or less per kilogram of body weight when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between two and three kilograms each.
- A chemical that has a median lethal concentration (LC50) in air of 200 parts per million by volume or less of gas or vapor, or 2 milligrams per liter or less of mist, dust, or fume when administered by continuous inhalation for one hour (or less if death occurs within one hour) to albino rats weighing between 200 and 300 grams each.

**Immediate use.** -Used by and under the control of the person who transfer the hazardous chemical from its labeled container (only within the work shift in which it is transferred).

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**Irritant:** A chemical that is not corrosive but causes a reversible inflammatory effect on living tissue by chemical action at the site of contact. A chemical is a skin irritant if when tested on the intact skin of albino rabbits by the methods of 16 CFR 1500.41 for four hours of exposure or by other appropriate techniques, it results in an empirical score of five or more. A chemical is an eye irritant if so determined under the procedures listed in 16 CFR 1500.42 or other appropriate techniques.

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

**Material Safety Data Sheet (MSDS):** Written or printed materials concerning a hazardous chemical that is prepared in accordance with 29 CFR 1910.1200(g).

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

**Organic peroxide:** An organic compound that contains the bivalent-O-O-structure and which may be considered to be a structural derivative of hydrogen peroxide where one or both of the hydrogen atoms have been replaced by an organic radical.

**Oxidizer:** A chemical other than a blasting agent or explosive 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 for which there is scientifically valid evidence 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 1300 F (54.5° C) or below.

**Sensitizer:** A chemical that causes a substantial proportion of exposed people or animals to develop an allergic reaction in normal tissue after repeated exposure to the chemical.

**Target organ effects:** Signs and symptoms of chemical effects on organs including hepatoxins, nephrotoxins, neurotoxins, agents that act on the blood or hematopoietic systems, agents that damage the lung, reproductive toxins, cutaneous hazards, and eye hazards. A categorization of these effects can be found in 29 CFR 1910.1200 Appendix A.

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*Toxic:* A chemical falling within any of the following categories:

- A chemical that has a median lethal dose (LD50) of more than 50 milligrams per kilogram of body weight when administered orally to albino rats weighing between 200 and 300 grams each.
- A chemical that has a median lethal dose (LD50) of more than 200 milligrams per kilogram but not more than 1,000 milligrams per kilogram of body weights when administered by continuous contact for 24 hours (or less if death occurs within 24 hours) with the bare skin of albino rabbits weighing between two and three kilograms each.
- A chemical that has a median lethal concentration (LC50) in air of more than 200 parts per million but not more than 2,000 parts per million by volume of gas or vapor, or more than 2 milligrams per liter but not more than 20 milligrams per liter of mist, fume, or dust, when administered by continuous inhalation for one hour (or less if death occurs within one hour) to albino rats weighing between 200 and 300 grams each.

*Unstable.* A chemical that in the pure state, or as produced or transported, will vigorously polymerize, decompose, condense, or will become self-reactive under conditions of shock, pressure, or temperature.

*Water-reactive.*- A chemical that reacts with water to release a gas that is either flammable or presents a health hazard.

#### REQUIREMENTS:

##### Labels and Other Forms of Warning

- Containers will remain labeled, tagged, or marked with required information.
- Labels, tags, and markings will include the identity of the hazardous chemical, appropriate hazard warnings, and the name and address of the chemical manufacturer, importer, or other reasonable party.
- Containers received without appropriate forms of warning will be properly labeled. The Plant shall contact the vendor for assistance.
- Portable containers do not have to be labeled if they are intended for immediate use (on that shift) by the employee who transferred the chemical from the container.



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**Material Safety Data Sheet (MSDS):**

- Employees have to be able to get access to the MSDS on any shift and at any time.
- MSDS's will be available to employees, OSHA and designated employee representatives.
- MSDS's will meet the requirements of the OSHA Hazard Communication Standard on Form 174 or the equivalent.
- MSDS's will be developed for hazardous chemicals manufactured or produced.
- Before hazardous chemicals will be used at the Plant, a MSDS will have been obtained from the supplier.

**Employee Information and Training:**

Training will be conducted at the time of an employee's initial assignment, annually thereafter, and whenever a new hazard is introduced into his/her work area.

**Employees will receive training in the following:**

- Methods to detect hazardous chemicals
- Physical and health hazards or chemicals
- Protective measures
- Details of the hazard communication program

**Employees will be provided the following information:**

- Requirements of the OSHA Hazard Communication Standard
- Operations with hazardous chemicals present
- Location and availability of the written hazard communication program
- Location and availability of the chemical inventory
- Location and availability of MSDS's
- Chemical hazards present during non-routine tasks
- Any hazards of chemicals in unlabeled pipes

**Contractors**

Contractors will be informed of the hazards of chemicals in their work area and of measures to protect their employees.

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## Recordkeeping

A written record of all employee training will be kept in the specific employee training file.

Employees will sign that they have received training and understand the chemical hazards in the workplace (see attached form).

## TRAINING

### Introductory Hazard Communication Training

What it covers: An overview of the OSHA hazard communication standard, chemical labeling and material safety data sheets (MSDS's).

Summary: The training session covers the following topics:

- Background. Explanation of OSHA
- Purpose of the OSHA Hazard Communication Standard
- Chemical manufacturer requirements
- Employer requirements
- What chemicals are covered
- What items are exempt
- Chemical labeling
- Understanding and using material safety data sheets
- Chemicals in the workplace

### Responsibilities:

Administrative Assistant is responsible for:

- Ensuring that all chemical purchase orders have the words "MSDS REQUIRED" on the purchase request.
- Maintain the central file for MSDS's
- Maintain proper documentation on training of employees

Shift Manager is responsible for:

- Providing employees and contractors with specific training and information on MSDS's as required by the standard (Appendix B).
- Conducting hazard communication training sessions
- Documenting employee training that is conducted within the department
- Ensuring proper labeling on containers

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Operation Manager is responsible for:

- Developing and maintaining a current list of hazardous chemicals used by the facility
- Ensuring there is a current MSDS for each chemical used in the facility
- Reviewing MSDS's for compliance with OSHA guidelines
- Ensuring all contractors to the facility are made aware of the existence of a hazard communication program.

#### 6.0 EQUIPMENT/MATERIAL REQUIRED

MSDS Notebook

#### 7.0 SAFETY REQUIREMENTS

None

#### 8.0 EXHIBITS

A. Employee Training Document

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EXHIBIT A  
**Acknowledgement of Receipt of Training**  
Hazard Communication Standard  
29 C.F.R. 1910.1200

Trainer Name: Chris Stromerson Date: \_\_\_\_\_

Trainer Address: 20320 80<sup>th</sup> Ave. S, Kent, WA 98032

Initial Training: \_\_\_\_\_ Annual Training: X Refresher Training: \_\_\_\_\_

Summary of the Hazard Communication Standard Training, including but not limited to:

- Provide an overview of OSHA's Hazard Communication Standard 29 CFR 1910.1200
- Discuss chemical routes of entry, general signs/symptoms to chemical exposure, general first aid procedures
- Discuss the general chemical categories found within the workplace and proper precautions
- Discuss the location of the MSDS's within the workplace
- Review an example Material Safety Data Sheet (MSDS)
- Discuss the requirement to have a Material Safety Data Sheet (MSDS) prior to the chemicals' arrival and use on site.
- Review MSDS's for specific chemical that the new employee will be using or exposed to in his/her initial job duties
- Discuss the labeling requirements within the workplace when a chemical is transferred or an original label is illegible
- Open discussion for questions and answers

**CERTIFICATION**

*I have received the above-referenced training, which represents OSHA's Hazard Communication training requirements, and I have been tested on these topics. During the training, I was provided the opportunity to ask questions and receive answers, and I know that I may contact the trainer listed above if I have additional questions.*

\_\_\_\_\_  
Employee Name (Printed)

\_\_\_\_\_  
Social Security Number

\_\_\_\_\_  
Employee Name (Signature)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Position

\_\_\_\_\_  
Name and Address of Place of Employment