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REGULATORY ASSESSMENT OF A BUSINESS OPERATION FOR ENVIRONMENTAL HEALTH & SAFETY COMPLIANCE

THE FOLLOWING IS DU-ALL SAFETY'S SAFETY ASSESSMENT SERVICE. THE ASSESSMENT TEAM WILL NOT INTERRUPT CLIENT OPERATIONS. AN ESCORT IS NEEDED THAT IS FAMILIAR WITH THE FACILITY, RELEVANT PROCESSES AND PROCEDURES. ALL NOTES AND REPORTS GENERATED WILL BE CONFIDENTIAL.

I. Scope:

The Assessment will be conducted using the approach outlined in Attachment A and will include the following Client operations.

The Assessment will include a review of:

- Environmental programs, policies, and permits. (Attachment B)
- Safety program, policies, procedures and permits. (Attachment C)

II. Assessment Procedure:

The EH&S assessment will be conducted in six (6) phases:

- a) Initial meeting with key operational staff to review Assessment process.
- b) Schedule site visit(s) to assess materials, equipment, and hazards present.
- c) Job site specific evaluation(s) of hazardous functions conducted by personnel.
- d) Identification and evaluation of the required written programs, permits, postings, and recordkeeping for Client's operations described in Section I.
- e) Develop written Assessment report on Client's environmental health and safety compliance status in a gap-analysis format.
- f) Review the written Assessment and compliance status report with management including recommended plan of action with compliance goals and timeline.



Attachment A
Environmental Health & Safety Assessment
Scope and Proposed Approach

1. Client specifies areas of operation/organization for the assessment. I.e. Production or manufacturing operations, Research and development department, specific location, entire organization, etc.
2. Du-All Safety assigns the assessment team based on the subject knowledge required in the areas to be assessed.
3. Contact information and documentation request list are reviewed with site contact or designee.
4. Initial Information/Program gathering meetings are set with the site contact or designee
 - a. Conduct a walkthrough of Client locations
 - b. Interview Client representatives (i.e. environmental or safety coordinator, managers, supervisors, or designated employees who have specific knowledge of current operations)
 - c. Gather programs/documentation for assessment
 - d. Du-All Safety assessment team debrief
5. Review/assess programs, permits, documentation (see attached program list)
6. Du-All Safety Assessment Team review meeting
 - a. Gap Analysis
 - b. Minimal Compliance Standard
7. Confidential regulatory compliance assessment report is developed
 - a. Current Status
 - i. Current status compared to minimal requirements
 - ii. Current status compared to Best of the Class
 - b. Du-All Safety Recommendations
 - c. Draft Safety Plan of Action
8. Develop estimates for labor hours and resources required to manage and implement assessment recommendations.
9. Development and delivery of final report
 - a. Findings
 - b. Recommendations
 - c. Risk Assessment
 - d. Training Matrix
 - e. Suggested Plan of Action
 - f. Client's Comments
10. Assessment and Recommendation Presentation (Optional but Recommended)



Attachment B

Environmental Compliance Assessment

The following programs, permits, and related documentation are reviewed for applicability to the sites operations and compliance status. Assessments projects can be tailored to fit individual client needs by either assessing all programs listed, or a portion thereof.

California Accidental Release Program (CAL ARP): Facilities that have stationary sources with more than a threshold quantity of regulated substances listed in Title 19 CCR Section 2770.5.

Clean Air Act (CAA), Air Permit Compliance: Facilities that generate emissions regulated by the local air district (Bay Area Air Quality Management District or BAAQMD) (e.g. back-up power generators, laboratory chemicals, paint booths, gasoline tanks, etc.)

Clean Air Act (CAA), Section 609 and 608: Facilities that maintain or repair, motor vehicle air conditioners (MVAC) or stationary air conditioners.

Clean Water Act (CWA): Facility who discharge wastewater from industrial activities to the sewer or waters of the state.

Hazard Communication (employee Right to Know): Facilities where the employees are exposed to hazardous materials as part of their job .

Hazardous Materials Business (or management) Plan (HMBP or HMMP): Facilities that use/store regulated materials in quantities equal to or greater than 55 gallons for liquids, 200 cubic feet for gases and 500 pounds for solids.

Hazardous Waste Management Program (Resource Conservation and Recovery Act (RCRA)): Facilities that generate hazardous waste.

Spill Prevention, Control and Countermeasure (SPCC) Plan: Facilities with an aggregate aboveground oil (i.e. motor oil, gasoline, diesel fuel, transmission fluid, etc) storage capacity of the facility exceeds 1,320 gallons or underground capacity exceeding 42,000 gallons.

Storm Water Pollution Prevention Plan and Monitoring Program (SWPPP): Any facility that has outdoor operations or storage of hazardous materials that may come into contact with storm water (a list of applicable SIC codes is included in Appendix D of the Storm Water regulations).

Underground Storage Tank Program: Facilities that have underground tank or piping that store hazardous materials



Attachment C

Safety Compliance Assessment

The following programs, permits, and related documentation are reviewed for applicability to the sites operations and compliance status. Assessments projects can be tailored to fit individual client needs by either assessing all programs listed, or a portion thereof.

Aerosol Transmittable Disease (ATD): The ATD program is designed to protect employees who have occupational exposure to these diseases such as paramedics, police departments or health care workers. Employers are required to develop written procedures to screen for these ATDs and refer suspected or known cases to healthcare facilities.

Bloodborne Pathogen: Employers are required to develop and implement an Exposure Control Plan for employees who may have occupational exposure to blood or other potentially infectious materials.

Chemical Hygiene Plan (CHP): Employers engaged in the laboratory use of hazardous chemicals are required to develop and implement a CHP.

Confined Space: Required for employers whose employees engage in activities requiring work in and around the hazards inherent of confined spaces. The program details the proper processes and procedures for abating the hazardous associated with such work. Typical confined spaces entered in industry include manholes, tanks, and vaults.

Emergency Action Plan (EAP): The EAP addresses emergencies that the employer may reasonably expect in the workplace. Examples are fire; toxic chemical releases; earthquakes; hurricanes; tornadoes; blizzards; floods; and bomb threats.

Ergonomics: Ergonomics programs address the significant risk of work-related musculoskeletal disorders (MSDs) confronting employees in various workplaces. California requires employers to implement a written ergonomics program if the facility has had two or more repetitive motion injuries, in a 12-month period, by employees performing a similar job.

Fall Protection: Employers engaged in leading edge work, precast concrete construction work and residential construction work are required to develop and follow a fall protection plan under specific circumstances. Generally, fall protection protocols apply to employees working at elevated heights from ladders to skyscrapers.

Hazard Communication: Facilities where the employees are exposed to hazardous substance as part of their job.

Heat Illness Prevention: Applicable to all outdoor places of employment in California.

Hearing Conservation: An effective hearing conservation program must be implemented whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 dBa.



Hot Work/Fire Prevention Plan: “Hot Work” is any activity involving gas or electric welding, cutting, brazing, grinding, or other similar operations that produce spark or flame. It does not include electric soldering irons, or cooking operations.

Injury and Illness Prevention Program (IIPP): The IIPP is the framework safety program that applies to all California workplace environments with 10 or more employees.

Lockout Tagout (Control of Hazardous Energy): This program covers the servicing and maintenance of machines and equipment in which the unexpected energization or start up of the machines or equipment, or release of stored energy could cause injury to employees.

Personal Protective Equipment (PPE) Policy:

29 CFR 1910.132/133/135-.138; 8 CCR 3380 - 3385. Personal Protective Equipment (PPE) is the employees’ last line of defense against hazards that they may encounter in the workplace. The PPE policy determines what PPE (safety glasses, safety shoes, gloves, etc.) are to be worn by which group of employees under what circumstances. A Du-All Safety specialist will conduct a hazard assessment of your workplace and make recommendations for the necessary PPE.

Respiratory Protection: Employers are required to implement a Respiratory Protection Program when respirators are required to be worn by employees. Typically, respirators are worn to protect against occupational diseases caused by breathing air contaminated with harmful dusts, fogs, fumes, mists, gases, smokes, sprays, or vapors.

Workplace Violence Policy: This program is required under the "General Duty Clause," Section 5(a)(1) of the Occupational Safety and Health Act of 1970 (the Act) if the employer has determined that workplace violence is a potential safety hazard. In California, the general guidelines of the Injury and Illness Prevention Program necessitate the development of the program. The workplace violence policy establishes the responsibilities of managers, supervisors and employees with regards to incidents involving workplace violence.