

OSHA RECORDKEEPING PROCEDURES

PURPOSE: Each plant will maintain records concerning workplace injuries and illness to meet the requirements of federal, state, and local regulations. This policy is concerned with OSHA requirements. Any state and local requirements must be identified by the General Manager for compliance.

All OSHA logs are maintained and kept up to date electronically at www.millardref.com. At the end of each calendar year each facilities OSHA log is certified and sent to corporate, scanned and also kept electronically.

SCOPE: This policy outlines the minimum requirements of OSHA Recordkeeping Program. The General Manager is responsible for ensuring that the plant is in compliance with the requirements of the regulations. The Following is a description of the various records and notices that must be kept up-to-date in each Facility:

****IMPORTANT****

In the event there is an accident resulting in a fatality or the in-patient hospitalization of three or more employees, the General Manager shall report the incident WITHIN 8 HOURS by telephone or in person to the nearest OSHA office. Cal/OSHA has more stringent requirements. California reporting requirements is when the accidents results in a fatality or the in-patient hospitalization of one or more employees. California locations will need to review the accident investigation procedures in the safety manual for Cal/OSHA's reporting requirements.

Your regional OSHA Phone # _____ (Listed on your EARP). If you need assistance with the number to call, please contact corporate risk management.

The report to OSHA will include the following information:

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|-------------------------------|--------------------------------|
| a) Plant name | e) Names of injured employees |
| b) Location of the accident | f) Contact person |
| c) Time of the accident | g) Phone number |
| d) Number of workers involved | h) Description of the incident |

1) An official poster explaining the employee's rights and obligations under OSHA must be posted in a conspicuous location, such as the break room.

2) OSHA's Recording and Reporting Occupational Injuries and Illness Requirements;

300 Log of Work-Related Injuries and Illnesses (Mandatory)
300A Summary of Work-Related Injuries and Illnesses (Mandatory)
301 Injury and Illness Incident Report (Not Mandatory) instead Millard Refrigerated Services uses the first report of injury and the W.C. accident report.

How quickly must each injury or illness be recorded? You must enter each recordable injury or illness on the OSHA 300 Log within seven (7) calendar days of receiving information that a recordable injury or illness has occurred. Each continuing injury or illness must be updated every seven (7) calendar days.

When does the 300A Summary need completed and Posted? At the end of each year corporate risk management will enter the Average # of employee's and hours worked electronically for all facilities. Each facility will then be notified to print their OSHA 300A annual summary log have them certified by each plant manager and posted in a conspicuous location during February 1st to April 30th of the following year of the 300 log that has been summarized.

What is the retention time for the 300 log and 300A summary? You must save the OSHA 300 Log, the privacy case list (if one exists), the 300A annual summary log, the 1st report of accident and the W.C. accident report forms for five (5) years following the end of the calendar year that these records cover.

Is there a limit to the number of days away from work or restricted days at work I must count? Yes, you may "cap" the total days away and days restricted to the combined total of 180 calendar days. You are not required to keep track of the number of calendar days away from or restricted at work if the injury or illness resulted in more than 180 calendar days combined.

Example: If the injury involves 160 days away from work and 50 restricted work days the OSHA 300 log would show 160 days away from work and only 20 days restricted at work, because you cap the total days to 180 days for both columns combined.

Recording workplace injuries and illnesses on the OSHA 300 Log for most workplace injuries is a straight forward process. However, from time to time the unusual arises and you will need additional guidance. OSHA's web site will help you with questions for correct reporting.

To access OSHA's Web Site type www.osha.gov on the address line for internet explorer. Once on OSHA's web site click on *Standards* located on the right side of web page under laws and regulation. Scroll down the Standards page and click on *Part 1904 Recording and Reporting Occupational Injuries and Illness* to expose the requirements 1904.0 - 1904.49 that will answer most any question that will arise. Examples of topics are as follows:

- 1904.4 - Recording criteria.
- 1904.5 - Determination of work-relatedness.

- 1904.6 - Determination of new cases.
- 1904.7 - General recording criteria.
- 1904.31 - Covered employees.
- 1904.33 - Retention and updating.
- 1904.39 - Reporting fatalities and multiple (3) hospitalization incidents to OSHA.
Cal/OSHA has different reporting requirements on fatalities and (1) hospitalization. See Accident and Incidents investigation section of the safety manual.

3) Any alleged citation issued by OSHA must be posted at or near the place of the alleged violation. The alleged citation will provide guidance on the posting requirements. A copy of all alleged citations and associated correspondence must be kept on site and a copy sent to the Manager Loss Prevention.

4) The plant manager is responsible for completing the report of injury-illness statistics for the Bureau of Labor Statistics (BLS), when required. This report selects employers at random to participate in a survey of workplace injuries and illnesses. The completion of this report is mandatory and must be completed within 30 days of receipt. A copy of the completed report must be kept on file at the facility.