

# Holland Compliance Discussion

- Compliance is currently an **additional duty** for our estimator, Chris Bray
  - OSHA
  - Fire Marshal / Pressure Vessels
  - Environmental
  - Consumes 10% of his day
  - Supported by a 3d party vendor
    - Program Oversight
    - Specific training
    - Local / State / Federal change notification
  - **Every Holland employee is a safety officer**



# Holland Compliance Discussion

- What do we look for in our safety lead?
  - Attention to detail
  - Process Oriented
  - Accountability
  - Ability to communicate effectively
    - Across the organization and most importantly, to **leaders**
  - **Initiative**



# Holland Compliance Training Annual Calendar

January	Respiratory Protection / Review and Post OSHA 300 log
February	Personal Protective Equipment
March	Forklift Safety (Powered Industrial Trucks)
April	Machine Guarding / JHA Review and Update
May	Hazard Communication Program
June	Emergency Preparedness
July	Heat Stress / Review and Update Hoist Inspections
August	Fire Extinguisher Employment
September	Slip, Trips and Falls
October	Hearing Conservation
November	Lockout - Tagout / Review and Update Energy Control Procedures
December	Basic First Aid / Bloodborne Pathogens



# Holland Compliance Discussion

- Our OSHA Experience

- 2/28/23                      Anonymous Complaint to OSHA
- 3/1/23                        OSHA Visit to Holland 3/1/23
  - 6 vaguely worded hazards identified in the complaint
  - OSHA requested to inspect the same day
  - We allowed them to do so
  - The investigators determined **none** of the 6 items in the complaint were founded
- 3/7/23                        OSHA sends a request for information for **16 items**
- 3/15/23                      Holland provides requested information
- 5/31/23                      OSHA conducts plant air sampling
- 8/1/23                        OSHA schedules closing conference / \$9,374 fines
- 8/1/23                        Holland requests an informal conference w/ investigator's supervisor
- 8/22/23                      Holland receives settlement agreement from OSHA - \$877 fine



# Holland Compliance Discussion

- Our OSHA Lessons Learned

If OSHA arrives at your door to address an anonymous complaint:

Ask them to confirm the complaint was provided by a current employee

We will likely not, again, allow them entry unless they arrive with legal documentation, requiring we admit them

Involve your compliance vendor, if you have one, from the very beginning. Ours was very useful in this case

Make safety a priority, discuss it often, and conduct your business on a daily basis, like you are going to be hosting an OSHA visit the next day. The rest will take care of itself.



# NFI Corp

# Compliance

- How do we manage (live) Safety & Compliance?
- Embed safety into everything we do!
  - Make it a company Core Value
  - Corporate Mission Statement and Quality Policy
  - Onboarding Training
  - Ongoing Training
  - Awareness and Empowerment
  - Tracking and Accountability
  - Published (Everywhere!)



# Corporate Mission Statement and Quality Policy



NFI is the **global leader** in manufacturing custom, high-performance and superior quality printed graphics. With our respected and experienced employees, we deliver unparalleled **value**, exceptional **customer service** and **innovative solutions** with absolute dedication to **safety and quality**.

# FORMS & TEAMS

## NEAR MISS FORM

If you see a potential safety hazard or a condition that could lead to a safety issue, you can report it on the “Near Miss” form

- Forms are available online and, in the cafeteria,



**9 Reported**

- 4 Trip/Slip Hazards
- 3 Blocking Aisles Hazard
- 1 Blocking Electrical Panel Hazard
- 1 Electrical Cord Hazard

## SAFETY TEAM



- Mike
- Mark
- Robin
- Vinny
- Gail
- Craig (Cyber)
- Neil
- Rick
- Fred
- Jamie
- Collee

- Embed safety into everything we do!
  - Onboarding Training
  - Ongoing Training
    - From day 1, employees learn the fundamentals of safety and their responsibility & Accountability
    - Regular meetings and “upkeep” trainings



# SAFETY is our #1 Priority



- Tracking and Accountability on Monthly Basis
- Trainings (Machine Guarding, PPE, Trips & Falls, Lockout-Tagout, etc...)
- Accountability at every level
- NFI – has been recognized formally in 2023 for achieving over 1800 days of safety!
- NFI is currently @ 191 Days of safety

METRICS	ACTUAL FY 2024	TARGET FY 2024
# Recordable (occurrences)	0	0
FIRST AID	0	0
Process Safety Events	0	0

**SAFETY TEAM REMINDER**

Safety Glasses and Gloves are **MANDATORY** in our manufacturing operations


Be safe at work and at home

# Willington Nameplate Compliance

# Willington EH&S

- Full-time EH&S Coordinator on staff
  - Position responsible for Environmental and all Safety programs
  - Monthly reporting to DEEP
  - Annual compliance documents and permits
  - Safety committee – 6 participants, meets quarterly
  - OSHA and CT state audits
  - WNP sponsored trainings, internal and 3<sup>rd</sup> party
  - Weekly all-hands updates
- Considered a large volume waste generator
  - Chemical Etching, Metalphoto, Inks & Paints
- **WNP's #1 tenant is safety**

# Safety - Onboarding

	<b>Orientation - Safety Checklist</b>
<input type="checkbox"/> Employee: _____ <input type="checkbox"/> Department: _____ <input type="checkbox"/> Job Title: _____	
	<b>Completed</b>
Personnel Security Plan	
First aid kits	
Fire extinguishers (used by trained personnel only)	
Defibrillator (used by trained personnel only)	
List of trained personnel	
Telephones (911)	
All visitors report to the office	
Injury procedures	
Reporting a safety or security issue	
Evacuation maps, notification of an evacuation	
Evacuation meeting area (flagpole, report to Lead)	
Review personal protective equipment (PPE) requirements & posters, include hearing PPE options	
Eye washing units (screen washing, etch room, fabrication, Wastewater)	
Hazardous chemicals in etch room	
Resource Conservation Recovery Act (RCRA), hazardous waste for large generators	
Review HAZ COM documents	
Containers labeled properly	
Review Safety Data Sheets (SDS) for your work area	
Review Job Safety Analysis (JSA)	
Review Job Hazard Analysis (JHA)	
Review lockout/tag out requirements	
Waste Management & Contingency Plan	
Employee Signature: _____	
EH&S Coordinator: _____	
Date: _____	
<input type="checkbox"/> LGD <input type="checkbox"/> BG	
Form-F-03-11, Orientation Safety Checklist, Rev. 1	

# Safety Committee

## RESPONSIBILITIES

- Conduct quarterly safety audits – Operator and work center
- Review, discuss and Investigate safety accidents and near misses
- Conduct risk assessments to understand potential hazards
- Receive training on safety and health topics
- Monitor safety and health programs and systems
- Set example by working safely
- Job safety analysis (JSA) /job hazard analysis (JHA) evaluation
- Address, discuss and remedy all EHS issues and concerns
- Communicate solutions relative to findings to all employees