

OAI Illness and Injury Prevention Program

1. RESPONSIBILITY

The Injury and Illness Prevention (IIP) Program administrators, John Everett, Peter Milone and Juleen Savarese have the authority and the responsibility for implementing and maintaining this IIP Program for Ocean Associates, Inc. OAI's IIP administrators are also responsible for answering worker questions about the IIP Program. A copy of this IIP Program is available from OAI and is posted on OAI's online bulletin board.

2. COMPLIANCE

The great majority of OAI employees receive training and instruction at the customer site at which they work. All employees are responsible for complying with safe and healthful work practices. Our system of ensuring that all workers comply with these practices include one or more of the following checked practices:

- Informing workers of the provisions of our IIP Program.
- Evaluating the safety performance of all workers.
- Recognizing workers who perform safe and healthful work practices.
- Providing training to workers whose safety performance is deficient.
- Disciplining workers for failure to comply with safe and healthful work practices.
- Following up with workers for failure to comply with safe and healthful work practices as informed by our customers.
- Communicating with our customers to confirm that they have illness and injury prevention programs and/or office emergency plans.
- Requiring all workers to take safety training class annually.
- Providing list of common workplace hazards to all workers.

3. COMMUNICATION

OAI is responsible for communicating with all workers about occupational safety and health in a form readily understandable by all workers. Our communication system encourages all workers to inform their project leaders and OAI IIP program administrators about workplace hazards without fear of reprisal.

Our communication system includes one or more of the following checked items:

- New worker orientation included a list of common workplace hazards located on our electronic bulletin board, recommendation to discuss safety training with program leader at customer site and requirement to take on-line safety awareness training class.

- Review of our IIP Program with regular reminders to check the OAI electronic bulletin board for updates to our IIP Program.
- Requirement that all employees take on-line safety training program annually and certify completion.
- Regularly scheduled safety meetings.

- Posted or distributed safety information on the OAI electronic bulletin board.
- A system for workers to anonymously inform management about workplace hazards. All notices of hazards should indicate location, nature of hazard and date of hazard and be sent to Director of Human Resources, Juleen Savarese via e-mail. If you wish your communication to be anonymous, please mail your notice via U.S. mail to the following address: Ocean Associates, Inc., Attn: Juleen Savarese, 4007 N. Abingdon St., Arlington, VA 22207.

4. HAZARD ASSESSMENT

The great majority of OAI employees work at our customers' sites. Competent observers of our customers generally perform periodic inspections of these sites to identify and evaluate workplace hazards. OAI IIP program administrators inspect OAI headquarters.

5. ACCIDENT/EXPOSURE INVESTIGATIONS

Procedures for investigating workplace accidents and hazardous substance exposures include:

1. Directing our employees to fully cooperate with customer investigations of illnesses or injuries occurring at customer sites;
2. If occurring at OAI headquarters:
 - A. Interviewing injured workers and witnesses;
 - B. Examining the workplace for factors associated with the accident/exposure;
 - C. Determining the cause of the accident/exposure;
 - D. Taking corrective action to prevent the accident/exposure from reoccurring; and
 - E. Recording the findings and actions taken.

6. HAZARD CORRECTION

Unsafe or unhealthy work conditions, practices or procedures shall be corrected in a timely manner based on the severity of the hazards. Hazards shall be corrected according to the procedures detailed in the applicable customer's IIP Program or using the following procedures:

1. When observed or discovered at OAI headquarters;

2. If occurring at customer sites, when reported to OAI's Director of Human Resources, OAI shall immediately report such hazard and the need to correct it to the customer; and
3. When an imminent hazard exists which cannot be immediately abated without endangering employee(s) and/or property, we will remove all exposed workers from the area except those necessary to correct the existing condition. Workers who are required to correct the hazardous condition shall be provided with the necessary protection. If OAI becomes aware of an imminent hazard at a customer site, OAI will send a written communication to all employees to leave the customer site and OAI will notify the facility manager of the customer site at issue.

7. TRAINING AND INSTRUCTION

All workers shall have training and instruction on safety and health practices via an on-line safety awareness presentation located on the OAI electronic bulletin board. OAI employees are also offered training and instruction at the customer site at which they work. General Illness and Injury Prevention information is provided to all workers via the OAI electronic bulletin board.

General workplace safety and health practices include, but are not limited to, the following, and any lack thereof should be reported to OAI using the procedure set forth in item 3 Communication, above:

1. Implementation and maintenance of the IIP Program.
2. Posting a list of common workplace hazards.
3. Requiring employees to attend safety awareness class annually.
4. Emergency action and fire prevention plan.
5. Provisions for medical services and first aid including emergency procedures.
6. Prevention of musculoskeletal disorders, including proper lifting techniques.
7. Proper housekeeping, such as keeping stairways and aisles clear, work areas neat and orderly, and promptly cleaning up spills.
8. Prohibiting horseplay, scuffling, or other acts that tend to adversely influence safety.
9. Proper storage to prevent stacking goods in an unstable manner and storing goods against doors, exits, fire extinguishing equipment and electrical panels.
10. Proper reporting of hazards and accidents to supervisors.
11. Hazard communication, including worker awareness of potential chemical hazards, and proper labeling of containers.
12. Proper storage and handling of toxic and hazardous substances including prohibiting eating or storing food and beverages in areas where they can become contaminated.

8. RECORD KEEPING

We have checked one of the following categories as our record keeping policy.

x Category 1. Our establishment has twenty or more workers or has a workers' compensation experience modification rate of greater than 1.1 and is not on a designated low hazard industry list. We have taken the following steps to implement and maintain our IIP Program:

1. Our customers keep records of hazard assessment inspections, including the person(s) conducting the inspection, the unsafe conditions and work practices that have been identified and the action taken to correct the identified unsafe conditions and work practices, are recorded on a hazard assessment and correction form.