

Function of Beauty 5570 Snyderstown Rd. Paxinos, PA 17824

MACHINE GUARDING/ MACHINE SAFETY

1.0 Purpose

- 1.1 Function, Inc is committed to providing its employees with a safe and healthy workplace. Function's Machine Guarding/Machine Safety Program is an integral part of these safety efforts. Its purpose is to provide machine guarding safety expectations and information to employees and others performing services in our facilities. Once informed, employees and others are expected to take an active role in protecting themselves from such hazards.
- 1.2 This standard provides the minimum requirements to ensure compliance with Machine Guarding/Machine Safety Policy. Any local regulatory requirements that are more stringent must also be followed.

2.0 Scope

- 2.1 This standard applies to all Function sites, to all Function employees, and to all directly supervised contract employees. It is intended to ensure employee safety by maintaining full compliance Function's Machine Guarding Policy and local regulatory requirements.
- 2.2 This standard is applicable to all Function employees and to all work conducted in Function facilities. Non-Function Company personnel will follow the provisions of this standard while at Function facilities.
- 2.3 In accordance with this program, there are key requirements that must be performed to properly manage the risk associated with equipment and machinery.
 - 2.3.1 Create machine inventory, perform risk assessments and develop risk reduction measures/alternative procedures when tasks require removing, disabling, bypassing or suspending one or more of the machine safeguards.
 - 2.3.2 Ensure methodology for the design of machine guards conforms to applicable Standards and/or local regulatory requirements.
 - 2.3.3 Establish protocols for preventive maintenance and testing of emergency stops and interlocking devices IAW manufacturer recommendations.
 - 2.3.4 Use of pre-operational/start-up checklists.

- 2.3.5 Ensure machine guarding training is conducted.

- 2.3.6 Evaluate other Standards applicable to the site. In addition to these requirements, other standards may have more restrictive requirements based on the piece of equipment/machinery (i.e. Robotics, Power Presses, Grinding Machines).

3.0 Definitions

- 3.1 **Affected Employees** – Persons who work near equipment or machinery but have not had specific equipment/machine training, such general laborers, packers, etc.

- 3.2 **Authorized Machine Operator/Qualified Personnel**- A person who has been trained to operate, clean, service or maintain specific pieces of equipment/machinery.

- 3.3 **Emergency Stops**—A safety mechanism used to shut off machinery in an emergency when it cannot be shut down in the usual manner. Emergency stops shall not be used as an energy isolating device.

- 3.4 **Energy-Isolating Devices** – A mechanical device that physically prevents the transmission or release of energy, including, but not limited to, the following: a manually operated electrical circuit breaker, a disconnect switch, a manually operated switch, a slide gate, a slip blind, spectacle flange, a line valve, blocks (cribbing and cables/chains/straps, etc), and similar devices with a visible indication of the position of the device. (**Pushbuttons, emergency stops, touch screens, selector switches, and other control circuit type devices are not energy isolating devices.**)

- 3.5 **Ergonomics** -the science of designing the job to fit the worker, rather than physically forcing the worker’s body to fit the job.

- 3.6 **Lockout Tagout (LOTO)** – The placement of a lock or tag on the energy isolating device in accordance with an established procedure, indicating that the energy isolating device shall not be operated until removal of the lock/tag in accordance with an established procedure. (The Hershey Company term "lockout/tagout" requires the combination of a lockout device and a tagout device).

- 3.7 **Machine Guard** – A physical barrier that provides protection from a hazard. The guard must be fastened / firmly secured by a method (i.e. bolts) that prevents the guard from being inadvertently dislodged or removed without a tool.
- 3.8 **Interlock** – Mechanical, electrical, fluid power or other types of devices or means to prevent a hazardous situation(s) under specified conditions.
- 3.9 **Normal Operation** – The operating condition where the machine or production system performs the intended production function(s).
- 3.10 **Residual Risk** – The risk remaining after a risk reduction measure (protective measure) is taken.
- 3.11 **Risk** – The probability of occurrence of harm and the severity of that harm.
- 3.12 **Risk Assessment** – The process by which the intended use of the machine, the task and hazard, and the level of risk are determined.
- 3.13 **Risk Reduction** – That part of the risk assessment process involving the elimination of hazards or selection of other appropriate and feasible risk reduction measures (protective measures) to reduce the probability of harm or its severity.
- 3.14 **Risk Reduction Measures** – Any action or means used to eliminate hazards and/or reduce risks, such as:
 - 3.14.1 Inherently safe design
 - 3.14.2 Guards
 - 3.14.3 Awareness devices
 - 3.14.4 Safe work practices and procedures
 - 3.14.5 Training and other administrative controls
 - 3.14.6 Personal Protective Equipment (PPE)

4.0 Responsibility

- 4.1 The Director of EHS shall ensure that the requirements of this standard are met.
- 4.2 The EHS department is responsible for implementing the requirements in this standard.

MACHINE GUARDING/ MACHINE SAFETY

FOB-EHS-012

- 4.2.1 Review the site-specific processes, at least annually, to assess compliance with Function requirements and local regulations.
- 4.2.2 Oversee initial and annual refresher training.
- 4.2.3 Ensure that machine guarding risk assessments have been performed for the site.
- 4.2.4 Ensure that expectations for safe construction, delivery, and installation of equipment and machinery are written into the contract and managed through the life of the project.
- 4.3 Facility Maintenance, with support from the EHS department is responsible for:
 - 5.3.1 Participation in initial and annual refresher training as required.
 - 5.3.2 Executing the Performance Driven Projects process and designing machine guarding into new project equipment.
- 4.4 Lead's/ Supervisor's Responsibility
 - 5.3.3 Reinforce training employees have received.
 - 5.3.4 Ensure machine guarding is addressed within the business unit.
- 4.5 Employee Responsibility
 - 5.3.5 Adhere to machine guarding requirements that pertain to their respective job assignments.
 - 5.3.6 Complete required machine guarding training provided by the site.

5.0 Procedures

- 5.1 It is expected that all equipment will be guarded in accordance with the spirit and letter of this standard and its references under normal production operations. However, it is recognized that some servicing and maintenance functions may require that point of operation guards may need to be removed in order to observe specific operations. In these unique cases, the site shall prepare a guard removal procedure that justifies the need for guard removal and outlines an equal level of protection to personnel in the area as that provided by the point of operation guard. The Guard Removal

Procedure and form are included as Attachment 3 of this standard. Alternative controls may consist of guarding by distance (e.g. barricades, video monitoring), guarding by the device, or other acceptable objective means that will ensure employee protection consistent with this standard and governing regulations.

- 5.2 Update Machine/equipment inventory list (refer to Attachment 1 for sample pulled from SAP PROD) and update as inventory is added or removed from the site.
- 5.3 General Safety Practices- There are some general practices that should be implemented to minimize health & safety risks associated with machinery and equipment.
 - 5.3.1 Visibility – Safeguarding methods must not interfere with the production process.
 - 5.3.2 Material Handling – If machinery must be removed or replaced, the appropriate lifting points and material handling equipment must be installed.
 - 5.3.3 Noise – Every effort must be made to reduce noise levels as low as reasonably achievable (ALARA.) Refer to the THC Hearing Conservation Standard, SS-03 for more information.
 - 5.3.4 Equipment/machine parts – All elements of the equipment must be protected against abrasion, contamination, ultraviolet radiation, mechanical or other damage.
 - 5.3.5 Energy-Isolating Devices–Energy-isolating devices must be provided locally, capable of being locked out, capable of dissipating stored energy, and equipped with a gauge to confirm zero energy state (as applicable.)
 - 5.3.6 Lubrication – Point of lubrication must be located to prevent access to moving parts. Consider the use of self-lubricating devices to mitigate risk.
 - 5.3.7 Personal Protective Equipment (PPE) – The use of PPE may be required based on the hazard assessment and stage of risk mitigation. Ensure that hearing protection, eye protection, leather uppers, etc. are adequate for the task being performed.

- 5.3.8 Housekeeping – The area around the equipment/machinery must be maintained in a clean and sanitary condition to prevent slip, trip, and fall hazards.
- 5.3.9 Preventive Maintenance (PM) – The equipment/machinery must be placed on a PM program to ensure safe, proper operation.
- 5.3.10 Lockout Tagout (LOTO) – Machine specific LOTO procedures must be developed when removing, disabling, bypassing or suspending one or more of the machine safeguards.
- 5.3.11 Ergonomics – Machinery/equipment must be designed with the end user in mind. Working height of machinery/equipment should be considered based on demographics of the region. Guards should be so constructed that removal does not present a hazard (location/height, weight, etc.) Emergency stops must be easily accessed at locations where the tasks are being performed.
- 5.3.12 Indicator lights on equipment and machinery must conform with THCA Engineering Standard and Specification Library, Electrical, Volume 3, Section 3 – Industrial Control Panels.
- 5.3.13 Temporary Wiring – Wiring used during installation, maintenance, or repair of equipment. Temporary wiring shall be removed immediately upon completion of machine / equipment installation.
- 5.4 A machine guarding risk assessment must be performed on all fixed industrial equipment and machinery to reduce risk to an acceptable level.
 - 5.4.1 The risk assessments must be uploaded to the Risk Management Module in S4Hana. If utilizing the services of an outside consultant, risk assessment records must be created in S4 and associated documents uploaded to the record.
 - 5.4.2 All risk assessments after the effective date of the machine guarding standard shall be recorded in S4. If an outside consultant is used, a record must be created in S4 and the associated assessment documents uploaded to the record.
- 5.5 Shift Walkthrough
 - 5.5.1 Ensure all guards are in place prior to operation.

- 5.5.2 No evidence of pneumatic or hydraulic leaks.
- 5.5.3 Workspace is clean and orderly.
- 5.6 Pre-Startup/ Line Start Up Checklists
 - 5.6.1 Refer to the Project Process Guide for a Pre-StartUp Safety review checklist.
 - 5.6.2 Refer to [Attachment 2](#) for a sample Line Startup Safety Review Checklist for machine / equipment safety. These items shall be checked prior to restarting a line that has been shut down for cleaning or maintenance. The attached checklist may be used or these items may be incorporated into an existing start up checklist.
- 5.7 Employee Training
 - 5.7.1 Initial machine guarding / machine safety training must be provided to all affected employees. Topics must include the following:
 - 5.7.1.1 Introduction to Machine Guarding / Machine Safety Policy and Standard.
 - 5.7.1.1.1 Machine guarding expectations for affected employees.
 - 5.7.1.1.2 Machine guarding expectations for authorized machine operators.
 - 5.7.1.1.3 Types of machine guards.
 - 5.7.1.1.4 Purpose of machine guards.
 - 5.7.2 Authorized Machine Operator Training must occur prior to performing tasks on equipment/machinery and shall include the following as appropriate:
 - 5.7.2.1 The functions and locations of manually operated controls.
 - 5.7.2.2 Safe methods for installing, removing and adjusting tooling.
 - 5.7.2.3 The location of all emergency stops.
 - 5.7.2.4 The location and method for installation and adjustment of all protective devices and guards.
 - 5.7.2.5 Use safety equipment/procedures (fire prevention, eyewash/showers)
 - 5.7.2.6 Procedures for maintaining a safe work area.

- 5.7.2.7 Procedures for inspecting and maintaining machinery systems.
 - 5.7.2.8 The proper method for each production set up.
 - 5.7.2.9 Procedures to safely perform necessary tasks that require personnel to be inside the machine envelope with the energy enabled (rare exceptions.)
 - 5.7.2.10 Demonstration of knowledge and tasks to safely operate the equipment.
- 5.7.3 Annual refresher training must be provided to all affected employees and authorized machine equipment operators.
- 5.7.4 Refer to [Attachment 4](#) for the entire training matrix.

8.0 Incident Reporting

- 7.1 All near misses, observations, and injuries involving equipment/machine guarding and safety must be reported immediately to a member of management and recorded in SAP. The operator should be part of the investigation and development of corrective actions. Follow up to ensure corrective actions are successful must be part of this process.

9.0 Management of Change (MOC)

- 9.1 *Any change to the process, material or equipment needs to be reviewed and approved according to the site's procedure for MOC. (reserved)*

10.0 Records

- 10.1 All documents generated due to the requirements of this standard shall be retained in compliance with the Records Retention Policy.

11.0 Document Review and Approval

- 11.1 Date Devised:** 4-19-19
- 11.2 Reviewed Date:** 07-26-21
- 11.3 Date Approved:** 05-07-21
- 11.4 Approved By:** Ed Nolter, Director, EHS

12.0 Appendices

Appendix A:	Machine / Equipment Inventory
Appendix B:	Machine / Equipment Risk Assessments and Risk Reduction Efforts
Appendix C:	EHS Design Review Checklists
Appendix D:	How to Access Information for Work Order History, PMs, Equipment Servicing
Appendix E:	Employee Training: Presentations, Attendance Sheets, Trainers
Appendix F:	<i>Management of Change Documents (reserved)</i>
Appendix G:	Pre-operational/Pre-Start Up Machine / Equipment Checklists
Appendix H:	List of Additional Standards for Regulatory Compliance (Compliance Registry)