Top 5 weirdest OSHA questions in 2006:

#5: "Does OSHA regulate song lists played over a store's stereo?"

#4: "Does the word 'MUST' in OSHA standards mean I HAVE to do it?"

#3: "For employee bathrooms, what kind of toilet seat does OSHA require?"

#2: "How do you go about using hazardous warning labels on products that are not hazardous?"

#1: "Instead of respirators, is it okay if workers just hold their breath?"
Missouri On-site Safety and Health Consultation Program
Background

- The need for OSHA Consultation
- Section 21(d)(2) of OSHAct
- 29 CFR 1908 - Consultation Agreements
- 90%/10% funding
Consultation Program

- OSHA “mock” inspection
- No fines, penalties, or citations
- No cost
Consultation Program (continued)

- Completely Confidential!
- Serious hazards/Imminent danger
- No referral since program’s inception
Consultation Program - Visit

- Opening Conference
- Analysis of Safety and Health Programs
- Walk through
- Interim Protections
- Closing Conference
Consultation Program – Visit (continued)

- Written Report
- Hazard Corrections
- Follow-up (optional)
- Close Case
Safety and Health Achievement Recognition Program (SHARP)

- What’s SHARP?
- Up to a two year exemption from OSHA’s general inspection schedule
- Fatalities/catastrophes, formal employee complaints, and imminent dangers still fair game
- Pre-SHARP
Safety and Health Management System (SHMS)
Safety and Health Management System Elements

1. Management Leadership and Employee Involvement

2. Workplace Analysis

3. Hazard Prevention and Control

4. Safety and Health Training

5. Program Evaluation/Improvement (I2P2 Addition)
Element #1 - Management Leadership and Employee Involvement

- Top management commitment essential!
- Policy statement
- Goals and objectives
- Management example
Good management example???

I wonder if the guy in the pink shirt is the supervisor?
Management Leadership and Employee Involvement (continued)

- Assign safety and health responsibilities
- Provide authority and resources
- Accountability
Management Leadership and Employee Involvement

- Safety and health inspections
- Safety suggestions vs. Safety incentives
- System review
Element #2 - Worksite Analysis

- Baseline and periodic safety and health surveys
- Hazard reporting system
- Analyze new processes, buildings, materials, equip.
Worksite Analysis

- Job safety and health analysis
- Expert hazard analysis
- Accident & incident investigation, near misses
- Trend analysis
Job Hazard Analysis (JHA’s)

Three Simple Steps:

1. Break the task down in steps
2. Identify the hazards in each step
3. Identify the control measures in each step

Ex. Employees who handle parts are experiencing cuts.
## JHA - Remove Burr From Cast Part

<table>
<thead>
<tr>
<th><strong>Job Step</strong></th>
<th><strong>Hazard</strong></th>
<th><strong>Control</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Reach into metal box to right of machine, grasp 15 pound casting, and carry to wheel.</td>
<td>1. Sharp burrs on part could cause laceration.</td>
<td>1. Use gloves or hand tool (clamp) to pick-up part.</td>
</tr>
<tr>
<td>2. Push casting against wheel to grind off burr.</td>
<td>2. Metal fragment could get in eye.</td>
<td>2. Use safety glasses in metal grinding operations.</td>
</tr>
<tr>
<td>3. Place finished casting in box to left of machine.</td>
<td>3. Reaching, twisting, lifting heavy part = back strain.</td>
<td>3. Body mechanics training; adjustable work stations.</td>
</tr>
</tbody>
</table>
Element #3 - Hazard Prevention and Control

- Controls – Source, Path, Receiver
- Engineering, Administrative, PPE controls
- Safety and health rules and work practices
- OSHA mandated programs
Hazard Prevention and Control

- Hazard tracking
- Preventive maintenance
- Emergency drills
- Medical program
Element #4 - Safety and Health Training

- New-Hire Employees
- Existing Employees
- Periodic Training Needs
- DOCUMENT!
- Tailor training for:
  - Employees
  - Supervisors
  - Managers
Why good detailed training is important.....
OSHA Compliance
OSHA Regulations

There are three primary OSHA regulations with which you must comply:

- **29 CFR 1904**—OSHA’s Recordkeeping Standards
- **29 CFR 1910**—OSHA’s General Industry Standards
- **29 CFR 1926**—OSHA’s Construction Industry Standards
Top 10 Sheltered Workshop Hazards found by MO On-site Consultation

1. 1910.305 Electrical
2. 1910.305 Electrical
3. 1910.120 0 Hazard Communication
4. 1910.212 Machine Guarding
5. 1910.304 Electrical (Grounding)
6. 1910.178 Forklifts
7. 1910.334 Electrical
8. 1910.157 Fire Extinguishers
9. 1910.132 PPE
10. 1910.147 Lockout/Tagout
OSHA 300 log (29 CFR 1904)

- Annual log of recordable injuries and illnesses
- 300A posted from February 1 to April 30.
- 301 – Injury and Illness Incident Report
Medical Treatment

- What is medical treatment?

- It does not include:
  - Visits to a PLHCP solely for observation or counseling
  - Diagnostic procedures
  - First aid
Cases that are not recordable - First Aid

- Using nonprescription medication at nonprescription strength
- Tetanus immunizations
- Cleaning, flushing, or soaking surface wounds
- Wound coverings, butterfly bandages, Steri-Strips
- Hot or cold therapy
- Non-rigid means of support
- Temporary immobilization device used to transport accident victims
Cases that are not recordable - First Aid

- Drilling of fingernail or toenail, draining fluid from blister
- Eye patches
- Removing foreign bodies from eye using irrigation or cotton swab
- Removing splinters or foreign material from areas other than the eye by irrigation, tweezers, cotton swabs or other simple means

- Finger guards
- Massages
- Drinking fluids for relief of heat stress
**OSHA's Form 300**  
*(Rev. 01/2004)*  
**Log of Work-Related Injuries and Illnesses**

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record non-work-related injuries and illnesses that are diagnosed by a physician or other licensed health care professionals. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.3 through 1904.8. Refer to OSHA Use Notes for a single case if you need to. You must complete an Injury and Illness Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.

<table>
<thead>
<tr>
<th>Identify the person</th>
<th>Describe the case</th>
<th>Classify the case</th>
<th>Enter the number</th>
<th>Check the % injury column or choose a type of illness</th>
</tr>
</thead>
<tbody>
<tr>
<td>(A) Case no.</td>
<td>(B) Employee's name</td>
<td>(C) Job title (e.g., Baker)</td>
<td>(D) Date of injury or onset of illness</td>
<td>(E) Where the incident occurred (e.g., Reading floor, shop area)</td>
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</tbody>
</table>

Public reporting burden for this collection of information is estimated to average 1.1 minutes per response, including time to review the instructions, search, and gather the data needed, and time to complete and review the collection of information. Persons are not required to respond to any collection of information unless an agency has previously displayed a currently valid OMB control number. You have any comments about this burden estimate or about other ways of collecting or reporting the information, call 1-800-OSHA-1977 (OSHA).
OSHA’s Form 301
Injury and Illness Incident Report

Information about the employee

1. Full name ________________________________
2. Name _________________________________
   City __________________ State ______ ZIP ______
3. Rate of Wage _______
4. Base ______
5. Date injured _______
   Time ______ AM/PM ______
6. What was the employee doing just before the incident occurred? Describe the activity, as well as the
   tools, equipment, or material the employee was using. Be specific - Examples: "lifting a ladder while
   spreading sealing materials," "spraying solutions from a hand sprayer," "readily available key entry."

    What happened? Tell us how the incident occurred. Examples: "Ladder fell 10 feet, worker fell 20 feet," "Wheelbarrow struck with concrete block during replacement," "Worker developed exposure to trichloro."¢

7. What was the injury or illness? Tell us the part of the body that was affected and how it was affected; be
   more specific than "hands," "joints," "stomach." Examples: "fractured hand," "chemical burns," "caused
   nausea symptoms."

8. What object or substance caused the incident? Examples: "concrete floor," "obstructed," "medical
   staff."

9. If the employee died, was the death due to this incident? Yes / No ______

Complained by ________________________________
Title __________________ Date ______

Information about the physician or other health care professional

1. Name of physician or other health care professional ____________________________

2. If treatment was given any time the employee was not at a facility where was it given? ______
   1. Yes ______
   2. No ______

3. Was employee hospitalized overnight? ______
   1. Yes ______
   2. No ______

4. Was employee treated in an emergency room? ______
   1. Yes ______
   2. No ______

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB No. 1218-0014

Public reporting burden for this collection of information is estimated to average 1 hour per response, including time for reviewing instructions, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection, including suggestions for reducing the burden, to US Department of Labor, OSHA Office of Statistics and Analysis, 200 Constitution Avenue, NW, Washington, DC 20210. Information is not subject to the Freedom of Information Act.
OSHA's Form 300A (Rev. 01/04)

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1903 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0." Employers, former employees, and their representatives have the right to review the OSHA Form 300A, as its equivalent. See 29 CFR Part 1904.26, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

<table>
<thead>
<tr>
<th>Number of Cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of deaths</td>
</tr>
<tr>
<td>Total number of cases with days away from work</td>
</tr>
<tr>
<td>Total number of cases with job transfer or restriction</td>
</tr>
<tr>
<td>Total number of other recordable cases</td>
</tr>
<tr>
<td>(a)</td>
</tr>
<tr>
<td>(b)</td>
</tr>
<tr>
<td>(c)</td>
</tr>
<tr>
<td>(d)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Days</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of days away from work</td>
</tr>
<tr>
<td>Total number of days of job transfer or restriction</td>
</tr>
<tr>
<td>(a)</td>
</tr>
<tr>
<td>(b)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Injury and Illness Types</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total number of .</td>
</tr>
<tr>
<td>(a) Injuries</td>
</tr>
<tr>
<td>(b) poisonings</td>
</tr>
<tr>
<td>(c) Hearing loss</td>
</tr>
<tr>
<td>(d) Skin disorders</td>
</tr>
<tr>
<td>(e) All other illnesses</td>
</tr>
<tr>
<td>(f) Respiratory conditions</td>
</tr>
<tr>
<td>(g)</td>
</tr>
<tr>
<td>(h)</td>
</tr>
</tbody>
</table>

Post this Summary page from February 1 to April 30 of the year following the year covered by the Log.

While reporting injuries for this collection of information is not required under 10 minutes per response, including time to review the instructions, seek and gather the data needed, and complete and submit the collection of information. Workers are not required to respond to the collection of information, unless it is by law or a contract with OSHA control number 1720. If you have any questions, call 1-800-241-7628 or write the Occupational Safety and Health Administration, OSHA, Washington, DC 20210. Do not send the completed forms to the office.

Establishment Information

<table>
<thead>
<tr>
<th>Item</th>
<th>Value</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employer name</td>
<td></td>
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<tr>
<td>Address</td>
<td></td>
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<tr>
<td>City</td>
<td></td>
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<tr>
<td>State</td>
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<tr>
<td>Zip</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Industry description</th>
<th>(e.g., Agriculture or food production)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Standard Industry Classification (SIC)</td>
<td>(e.g., 7312)</td>
</tr>
<tr>
<td>NAICS</td>
<td>(e.g., 322122)</td>
</tr>
<tr>
<td>North American Industrial Classification (NAICS)</td>
<td>(e.g., 322122)</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Employment Information</th>
<th>(If you have fewer than 10, see the Table below or use the space to the right.)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual average number of employees</td>
<td></td>
</tr>
<tr>
<td>Total hours worked by all employees last year</td>
<td></td>
</tr>
</tbody>
</table>

Sign here

Knowingly submitting this document may result in a fine.

I certify that I have examined this document and that, to the best of my knowledge the entries are true, accurate, and complete.

<table>
<thead>
<tr>
<th>Company name</th>
<th>#</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Form</td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>
OSHA Site-Specific Programs
OSHA Poster

- Must be displayed where workers can see it
- Explains worker and employer rights
- Downloadable from OSHA’s website
Emergency Action Plan
(29 CFR 1910.38)

**STEP #1**—What are the “reasonably foreseeable” emergencies that my company is exposed to?

**STEP #2**—What do I want my employees to do in the event of each of these emergencies?

**STEP #3**—If you have 11 or more employees, the plan has to be in writing.

**STEP #4**—Train your employees. This is Day #1 (new-hire) information.
Six Elements of Emergency Action Plan

1. Procedures for reporting a fire or other emergency
2. Procedures for emergency evacuation (type of evacuation and exit route assignments)
3. Critical facility operations before evacuation
4. Accounting for employees
5. Procedures for rescue or medical duties
6. Company POC for additional information
Emergency Action Planning

- **Alarm System**
  - Must be able to hear it above ambient noise
  - Distinctive/recognizable
  - Maintained and Tested
    - Supervised = Annually
    - Non-Supervised = Every 2 Months

- **Training** - Every employee must know their role!

- **Re-Training**
  - New Plan/New Employee
  - Revised Plan
Fire Prevention Plan
(29 CFR 1910.39)

Depending upon your process and fire extinguisher policies, you might need a FPP.

- List of all major fire hazards
- Proper handling and storage procedures for hazardous materials
- Potential ignition sources and their control
- Type of fire protection equipment necessary to control each hazard
Fire Prevention Plan
(29 CFR 1910.39)

5. Procedures to control flammable/combustible waste materials (housekeeping)

6. Maintenance procedures for heat-producing equipment

7. POCs for equipment maintenance and fuel hazards
Personal Protective Equipment (29 CFR 1910.132)

1. Hazard Assessment
2. Written Certification
3. Employee Training
   a) When PPE is necessary
   b) What PPE is necessary
   c) How to properly don, doff, adjust and wear PPE
   d) Limitations of PPE
   e) Proper care, maintenance, useful life and disposal
Hazard Communication
(29 CFR 1910.1200)

1. Inventory/list of hazardous materials

2. SDS for each hazardous material

3. SDS available on all shifts

Every private sector employer, regardless of size, must comply with HAZCOM!
Hazard Communication (continued)

4. Labeling - primary and secondary containers

5. Independent contractors

6. Non-routine tasks

7. Employee Training
Major revisions to the Hazard Communication Standard

1. **Hazard classification**: Provides specific criteria for classification of health and physical hazards, as well as classification of mixtures.

2. **Labels**: Chemical manufacturers and importers will be required to provide a label that includes a harmonized signal word, pictogram, and hazard statement for each hazard class and category. Precautionary statements must also be provided.

3. **Safety Data Sheets**: Will now have a specified 16-section format.

4. **Information and training**: The Revised HCS requires that workers be trained by December 1, 2013, to facilitate recognition and understanding of the new labels and safety data sheets.
GHS Pictograms

- Explosive
- Flammable
- Oxidizer
- Compressed Gas
- Acute Toxicity
- Corrosive
- Chronic Health Hazard
- Irritant
Dates To Remember

• Employers by December 1, 2013:
  ◦ Initial employee training on pictograms, hazard statements and signal words
  ◦ Minimal training on new SDS format

• Employers by June 1, 2015:
  ◦ Continue to maintain the updated SDSs
Lockout/Tagout Program
(29 CFR 1910.147)

- Energy Control Procedure—protects employees who:
  - Perform maintenance
  - Operate machinery

- Excluded Operations:
  - Cord/Plug equipment (if plug is controlled)
Lockout/Tagout Program
(29 CFR 1910.147)

Written Energy Control Program

1. Locks or Tags acceptable
   a) Durable
   b) Standardized
   c) Substantial

2. Written start-up/shut-down procedures for:
   a) Hard-wired machines
   b) Two or more sources of energy
Lockout/Tagout Program
(29 CFR 1910.147)

3. Periodic Inspections of Lockout/Tagout Procedures
   ◦ At least annually
   ◦ Employer must certify (machine, date, employee observed, inspector name)

4. Authorized/Affected Employee Training
   ◦ Must ensure employee has knowledge and skills
   ◦ Retraining Requirements
Bloodborne Pathogen Program
(29 CFR 1910.1030)

- Applies if employees have exposure to blood or other infectious materials
- Exposure Control Plan
- Universal Precautions
- Hepatitis B Vaccinations
- Communication of Hazards to Employees
- Training

NOTE: “Good Samaritan” acts are not considered occupational exposure!
Respiratory Protection Program
(29 CFR 1910.134)

- Voluntary Use
- Procedures for selection
- Medical Evaluations
- Fit Testing
Respiratory Protection Program (continued)

- Cleaning, disinfecting and storage
- Training
- Evaluation of program effectiveness
Hearing Conservation Program
(29 CFR 1910.95)

- Required above 85 dBA for 8 hours
- Monitoring Program
- Audiometric testing
- Training
Other OSHA Programs

Depending upon your process, you might also need:

- Forklift Operators Training Program
- Confined Space Program
- Fall Protection Program
- Mechanical Power Press Program
- Electrical Worker Training
Self-Inspection Programs
Why do we need a Self-Inspection Program?

- More safe and healthful workplace
- Consistent removal of hazards from the workplace
- Increased productivity
- Better employee morale
- OSHA Compliance
Inspection programs by themselves will not work! – Why?

For example:

How does this hazard involve the “breakdown” of the four elements of safety and health program management?
Keep in mind......

- Inspections are not the Safety Manager’s responsibility

- **Everybody** is an inspector

- Safety committees vs. no safety committees
Self-Inspection Checklist
(OSHA’s Handbook for Small Business pub. #2209)

Covers the following:

- Posting and Recordkeeping
- Safety and Health Program
- Medical Services and First Aid
- Fire Protection
- PPE
- General Work Environment
- Walkways
- Floor and Wall Openings
- Stairs and Stairways
- Elevated Surfaces
- Exiting or Egress
- Ladders
- Tools
- Machine Guarding
- LOTO
- Welding, Cutting and Brazing
- Compressed air
- Compressed Gas Cylinders
- Hoists
- Forklifts
- Spraying Operations
- Confined Spaces
- Environmental Controls
- Flammable and Combustibles
- Chemical Exposures
- Hazcom
- Electrical
- Noise
- Material Handling
- Ventilation
How about some pictures of hazards?

**NOTE:** This presentation does not include all hazards possible in a facility.
Good tools for self-inspections

- AC Sensor
- Tic Tracer
- Outlet Tester
- Gotcha stick
Helpful Web Sites

- http://www.labor.mo.gov/ls/safetyconsultation
Questions?