

# Mastering OSHA Compliance

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# Effective Safety & Health Programs

- Management Commitment
- Employee Involvement.
- Worksite Analysis
- Hazard Prevention and Controls
- Training and Understanding
- Continuous Improvement

# Hazard Control

- How do you control what goes on the workplace?
- People will do what you inspect, but necessarily what you expect

# The test questions

- Do you have clear rules and expectations?
- How do you know employees understand the rules and expectations?
- Do you have an effective process to discover deviations from expectations?
- Do you have an effective enforcement program?

# Common citations

- Lockout
- Electrical hazards
- Machine Guarding
- Powered Industrial Trucks
- Hazard Communication
- Personal protective equipment
- Respiratory Protection
- Safe Exit Routes
- Fire Extinguishers
- General Duty
- Silica
- Noise
- Fall hazards
- Process safety management
- Housekeeping
- Confined space hazards
- Reporting and recordkeeping
- Slings
- Cranes

# PPE hazard assessment

- Assessment of all jobs/tasks.
- Written certification.
- Certifying official identified.
- Date of last evaluation



# PPE hazard assessment

	Apron	chemical resistant gloves	face shield	metatarsal safety shoes	safety glasses	leather gloves	hearing protection	HEPA respirator
Painter	x	x	x		x			
Grinding (abrasive wheel)			x		x		x	
Garbage collection				x	x	x		
Battery maintenance	x	x	x	x	x		x	
Furnace Cleaning			x	x	x	x	x	x



# Training / Understanding

- When
- What
- How
  - to put on and off, adjust, fit, & wear
- Its limitations
- Proper care, maintenance, useful life, & disposal





# Respiratory Protection Program

- Program Administrator
- Written program – selection process
  - Do you know the level of the contaminant?
- Medical evaluation
- Fit test
- Training
- Recordkeeping

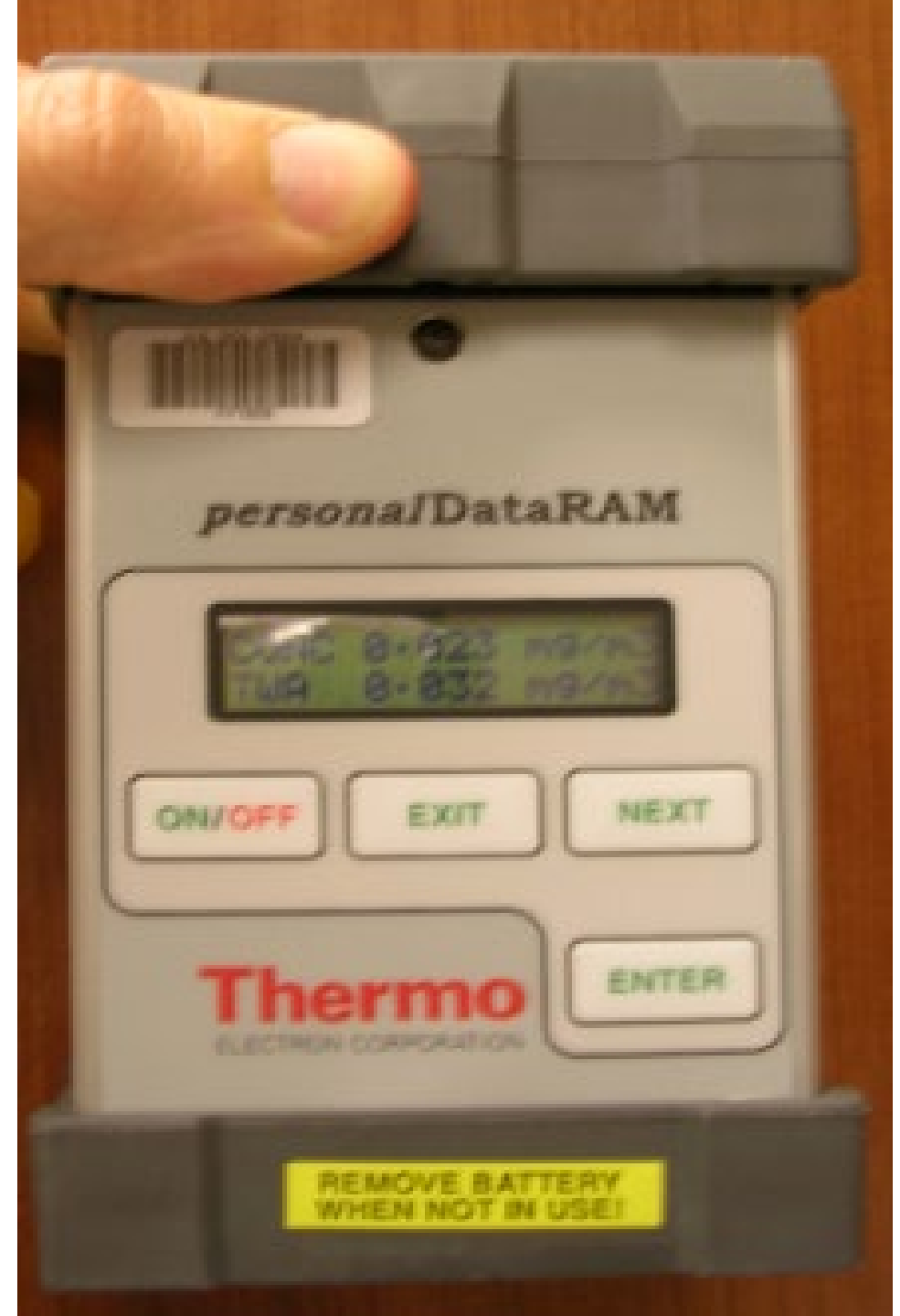


# Fit test



# How dusty is it?

- It is so dusty that...



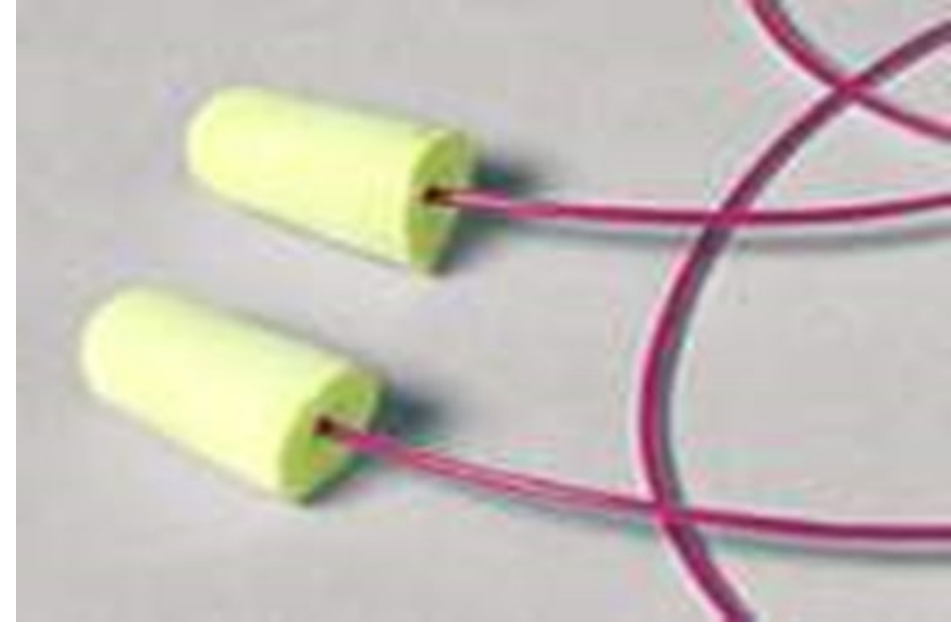


# Carbon monoxide fatalities and hospitalizations



# Noise - Hearing Conservation

- d. Monitoring
- e. Employee notification – above A.L.
- f. Observation of monitoring
- g. Audiometric testing (who, when & evaluation)
- h. Audiometric test requirements (how)
- i. Hearing protectors
- j. Hearing protector attenuation
- k. Training
- l. Access to information and training materials
- m. Recordkeeping



# Focus Four Hazards



Falls



Caught-in  
or -Between



Struck-by



Electrocution



# Fall protection training

- (i) The fall hazards in the area and how to recognize them;
- (ii) The procedures to be followed to minimize those hazards;
- (iii) The procedures for installing, inspecting, operating, maintaining, and disassembling the fall protection systems;
- (iv) The personal fall protection systems and equipment including, proper hook-up, anchoring, tie-off techniques, equipment inspection and storage.

# Are all your fall hazards protected?



# Fall protection proper use

- Fall protection v restraint
- Swing fall hazard





# Ladder hazards?



# Ladders – Rules to Protect

- Inspected before use
- Removed if damaged
- Secured
- Extend 3 feet above access/roof
- Used properly
- Contact with hazard





# Aerial lift

- Full body harness and lanyard must be used in aerial lifts





# Material Handling Fatality

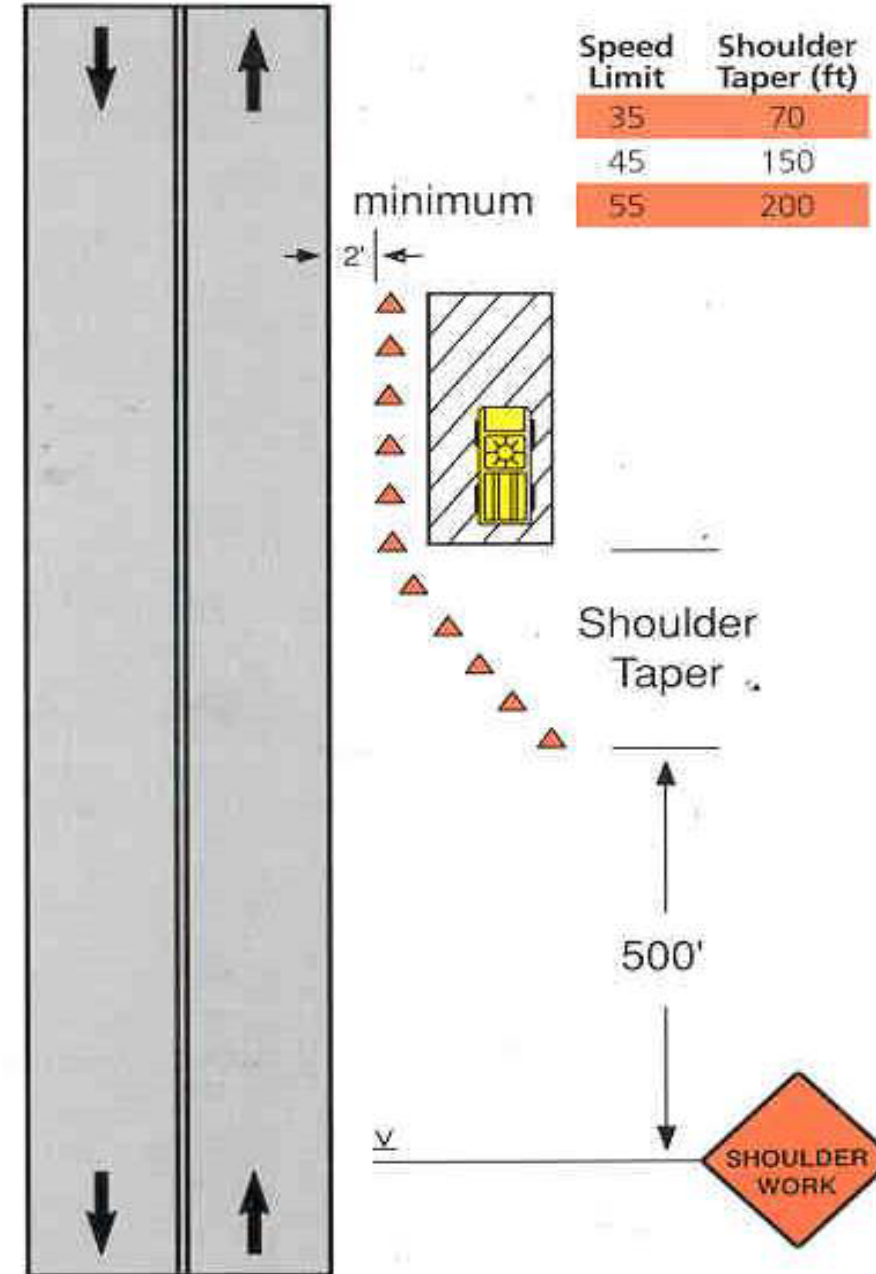


- Forklift loading 20 foot long 16-inch diameter pipe onto truck bed

# Appropriate traffic control

- Temporary traffic control in accordance with MUTCD or IDOT.
  - Advance warning signs
  - Channeling devices
  - Barriers

## Shoulder Work (2' – 15' From the Edge of Pavement)





# Powered Industrial Vehicles

- Training
- Evaluation
- Inspection
- Removed from service until safe



# How is your enforcement?

- 1910.176(a): safe clearances was not allowed for aisles doorways and wherever turns were made and aisles were not kept clear with no obstructions that could create a hazard:
- 1910.178(n)(1): All traffic regulations were not observed. A safe distance was not maintained approximately three truck lengths from the truck ahead, and the truck was not kept under control at all times:
- 1910.178(n)(8): Under all travel conditions the truck was not operated at a speed that would permit it to be brought to a stop in a safe manner:



# machine guarding assessment



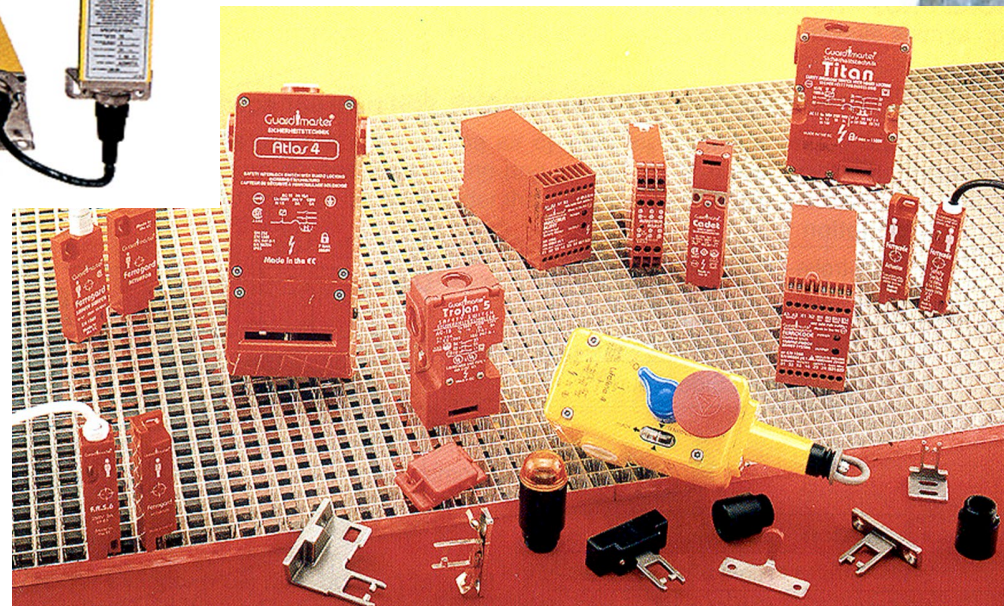
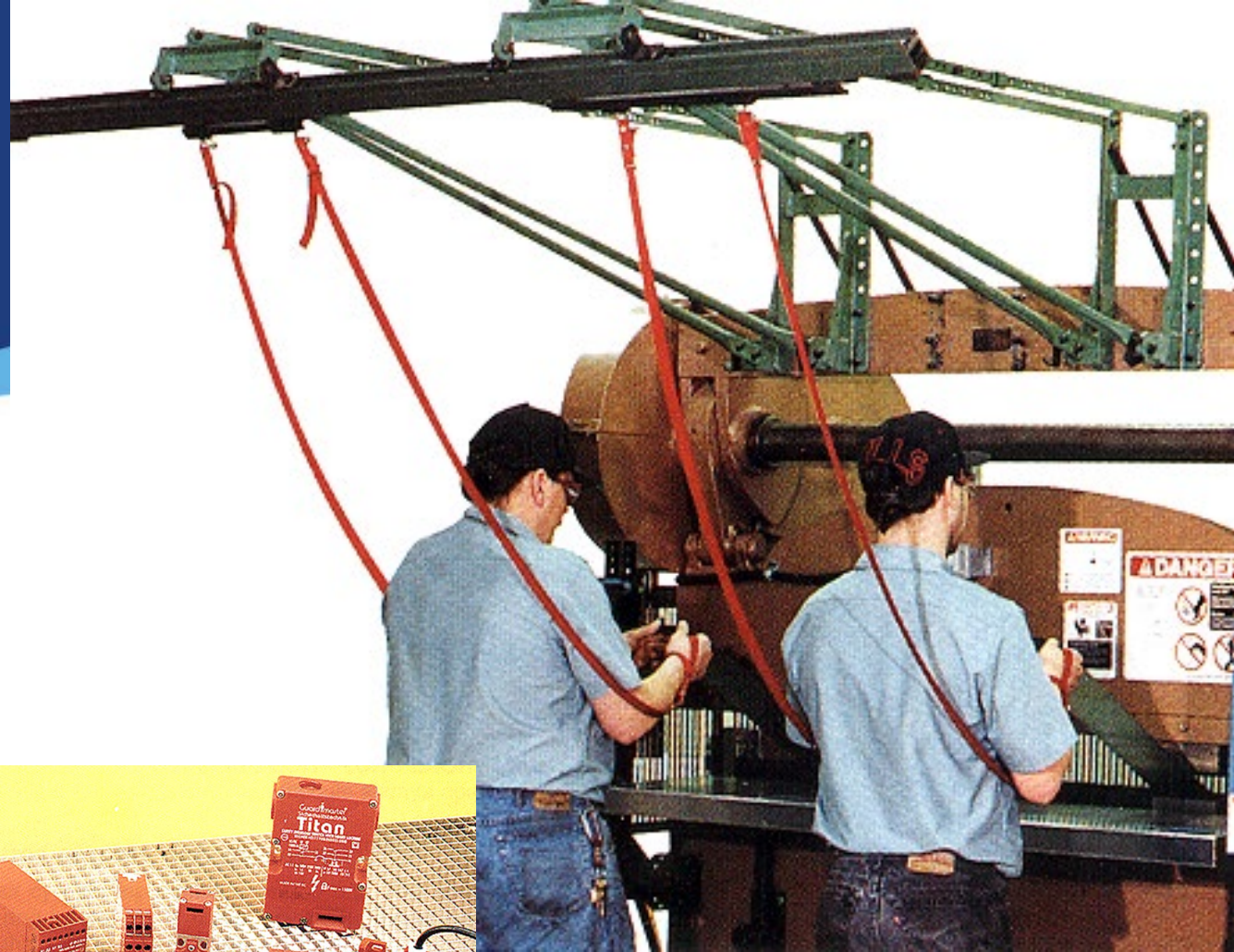
# Amputation NEP

- Complaints and referrals alleging potential exposures to amputation hazards that could result in injury must be handled by an inspection.





# Protection



# Lockout










- Written program
  - Group lockout
- Specific procedures
  - Energy sources
  - Method of isolation
  - **Verification**
- Training
- Periodic Inspection



# hazard communication program

- Management **responsibility** for program
- Develop **list** of hazardous chemicals
- **Label** hazardous chemical containers
- Manage **Safety Data Sheets**
- Procedures for **training** exposed employees
- Address the hazards of **non-routine tasks**
- Procedures for **Multi-employer** workplaces



<b>Health Hazard</b>    <ul style="list-style-type: none"> <li>▪ Carcinogen</li> <li>▪ Mutagenicity</li> <li>▪ Reproductive Toxicity</li> <li>▪ Respiratory Sensitizer</li> <li>▪ Target Organ Toxicity</li> <li>▪ Aspiration Toxicity</li> </ul>	<b>Flame</b>    <ul style="list-style-type: none"> <li>▪ Flammables</li> <li>▪ <u>Pyrophorics</u></li> <li>▪ Self-Heating</li> <li>▪ Emits Flammable Gas</li> <li>▪ <u>Self-Reactives</u></li> <li>▪ Organic Peroxides</li> </ul>	<b>Exclamation Mark</b>    <ul style="list-style-type: none"> <li>▪ Irritant (skin and eye)</li> <li>▪ Skin Sensitizer</li> <li>▪ Acute Toxicity</li> <li>▪ Narcotic Effects</li> <li>▪ Respiratory Tract Irritant</li> <li>▪ Hazardous to Ozone Layer (Non-Mandatory)</li> </ul>
<b>Gas Cylinder</b>    <ul style="list-style-type: none"> <li>▪ Gases Under Pressure</li> </ul>	<b>Corrosion</b>    <ul style="list-style-type: none"> <li>▪ Skin Corrosion/ Burns</li> <li>▪ Eye Damage</li> <li>▪ Corrosive to Metals</li> </ul>	<b>Exploding Bomb</b>    <ul style="list-style-type: none"> <li>▪ Explosives</li> <li>▪ <u>Self-Reactives</u></li> <li>▪ Organic Peroxides</li> </ul>
<b>Flame Over Circle</b>    <ul style="list-style-type: none"> <li>▪ Oxidizers</li> </ul>	<b>Environment</b> (Non-Mandatory)   <ul style="list-style-type: none"> <li>▪ Aquatic Toxicity</li> </ul>	<b>Skull and Crossbones</b>    <ul style="list-style-type: none"> <li>▪ Acute Toxicity (fatal or toxic)</li> </ul>

# Employee training

- Methods and observations used to detect a release of a hazardous chemical
  - (monitoring, odor, visual appearance)
- The physical and health hazards of chemicals in the work area.
- The measures employees can take to protect themselves
  - (specific procedures, work practices, emergency procedures, and ppe)
- The details of the hazard communication program
  - (labeling, MSDS's, and how to obtain and use the information.

# Hazard Communication update

- Adding hazard classes in Appendix B (physical hazards) will give more complete and detailed information about:
  - Flammable gases – expanding hazard categories
  - Desensitized explosives
  - Aerosols – including additional hazard category
- Updating select hazard and precautionary statements for clearer and more precise hazard information.



# Timetable for compliance effective July 16, 2024.

Compliance Date	Requirement(s)	Who
18 months after publication	Update labels and SDSs for substances	Chemical manufacturers, importers, distributors and employers
24 months after publication date	Update workplace labels, hazard communication program and training as necessary	Employers
36 months after publication	Update labels and SDSs for mixtures	Chemical manufacturers, importers, distributors and employers
42 months after publication	Update workplace labels, hazard communication program and training as necessary	Employers
Transition Period - July 19, 2024 to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (this final standard), or the previous (2012) standard, or both	Chemical manufacturers, importers, distributors, and employers

# Chemical storage and use

- Flammable or combustible liquids shall be stored in tanks or closed containers.
- 1910.106(e)(2)(ii)



# Flammable liquid storage

- The quantity of liquid that may be located outside of an inside storage room or storage cabinet in a building or in any one fire area of a building shall not exceed:
- 25 gallons of Category 1 flammable liquids in containers
- 120 gallons of Category 2, 3, or 4 flammable liquids in containers
- 660 gallons of Category 2, 3, or 4 flammable liquids in a single portable tank.



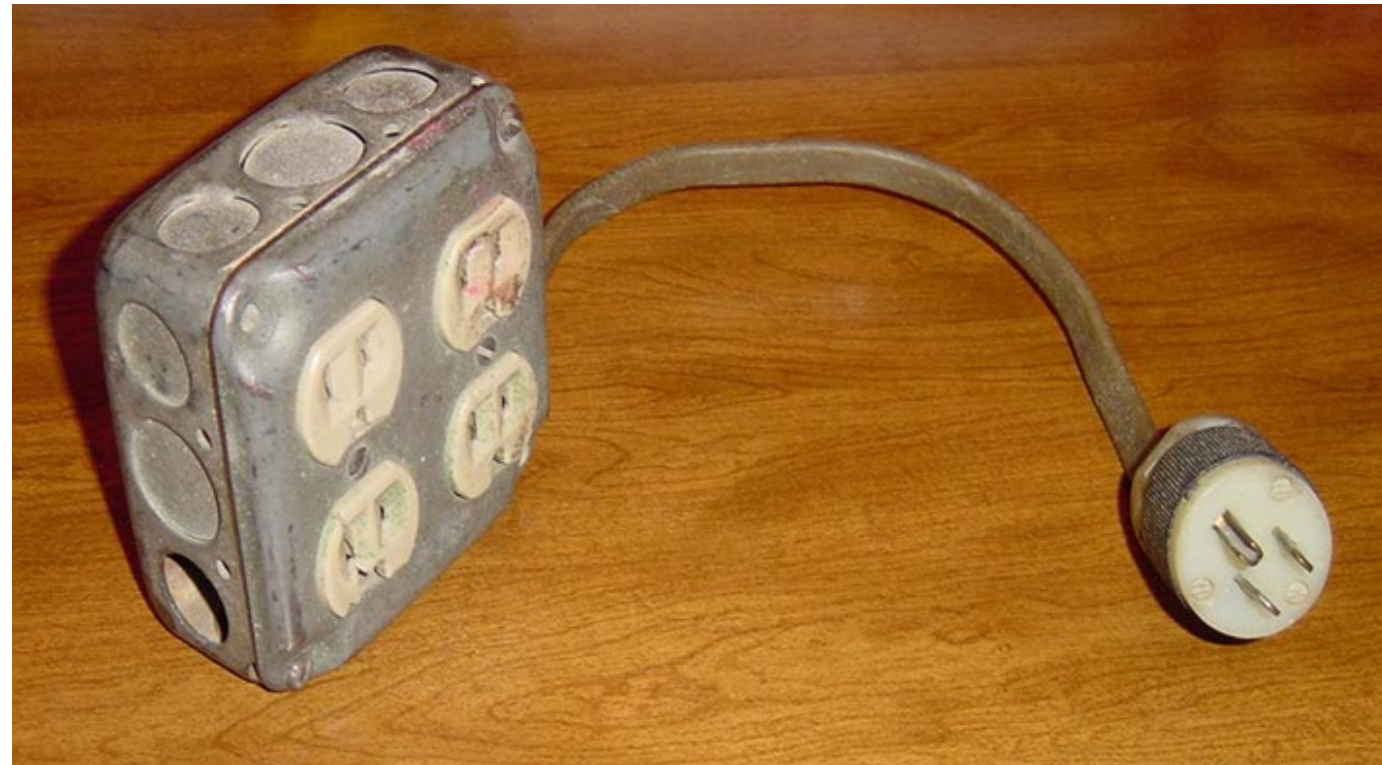


# Combustible dust

- Housekeeping
- Return air without protection
- Deflagration propagation protection



# Have you checked your electrical equipment?





# Electrical hazards





# Power lines

- Maintain a minimum of a 10-foot clearance from power lines.
- Additional 0.4 inch for every 1 kV over 50 kV.



Sure looks nice out.  
Where is the hazard?





# Servicing an irrigation well





# Two employees asphyxiated in 8x8x8 concrete pit



# Confined space entry

- Document air monitoring results prior to entry into any confined space
- Rescue practice



# 2025 National Emphasis Programs

- Fall
- Heat
- Excavations
- Amputation hazards
- Lead
- Silica
- Hexavalent chrome
- Warehousing
- Combustible dust
- Shipbreaking
- Primary metals
- Process Safety Management



# 2025 Regional Emphasis Programs

- Powered industrial vehicles
- Noise
- Grain handling
- Food manufacturing
- Tank cleaning
- Building renovation
- High rise building
- Wood pallet manufacturing

# Warehousing NEP

- Reducing exposure to common hazards:
  - powered industrial vehicle operations
  - material handling/storage
  - walking-working surfaces
  - means of egress
  - fire protection
- Heat and Ergonomic hazards.



# Fire extinguisher training

- Where portable fire extinguishers are provided
- The employer shall provide an educational program to familiarize employees with the general principles of fire extinguisher use and the hazards involved with incipient stage fire fighting.



# General duty violations

- Exposed employees
- Serious hazard
- Employer knowledge
- Feasible method to control hazards





# Ergonomic stressors

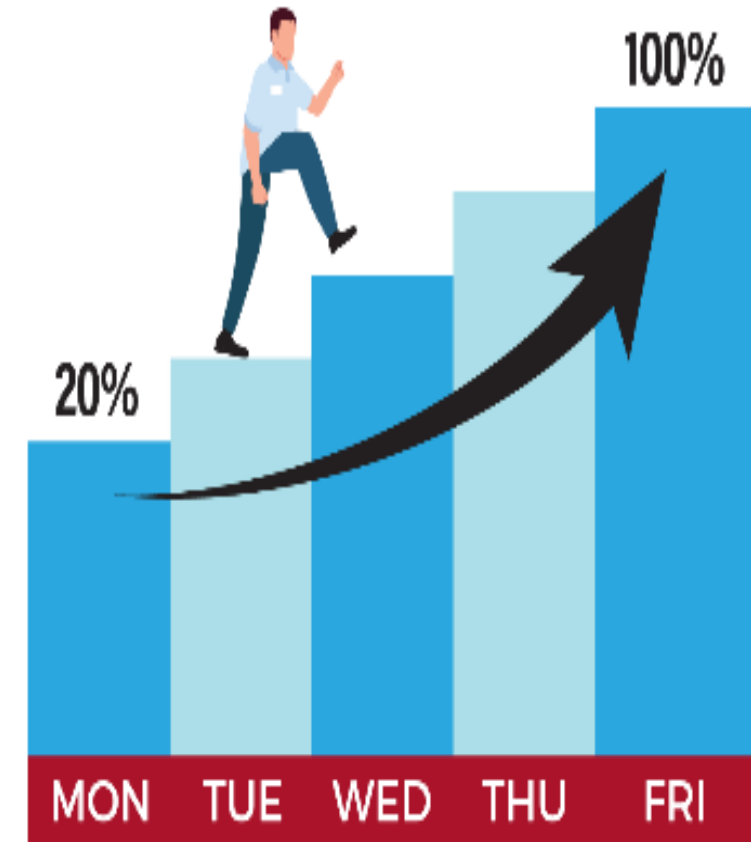
- Employees were required to manually lift pork product boxes, averaging 52 pounds, from the palletizing conveyor onto pallets from the floor level up to 9 product tiers in height. The frequency and duration of lifts, weights of the products, repetitive motions, and postures exposed employees to the risk of low back injuries.

# Damaged storage systems

- Employees were exposed to struck-by and crushing hazards when conducting warehouse tasks at and/or near pallet rack storage systems that were damaged due to forklift impacts. The storage racking systems had damaged/deflected upright columns that included, but were not limited to the columns and racking components of the following storage racks: 03-31-35-02-01, 03-32-32-02-01, 02-20-31-02-02, 04-34-28-02-01, 02-29-17-02-01.

# Heat Illness Prevention

- Written Heat Illness Prevention Program
- Plan to acclimatize new workers
- Water intake plan
- Know signs of heat illnesses
- Management ensures check on workers
- Plan for emergencies
- Understanding





# OSHA Recordkeeping

- 11, 20, 100
- OSHA 300
- OSHA 300A
- OSHA 301



*"It's easy and beneficial."*




*"It's important and required."*

## Brief Tutorial on Completing the OSHA Recordkeeping Forms





Because this presentation includes voiceover narration, it is best experienced using audio speakers or headphones.



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# OSHA QuickTakes



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