OSHA
Occupational Safety and Health Administration

UNITED STATES DEPARTMENT OF LABOR

Topics

- Your Questions
- OSHA inspection insight
- Common citations
- Your questions

What did we cite last year?

- Respiratory Protection
- Emergency Temporary Standard
- Lockout
- Reporting 8/24 hours
- Recordkeeping
- Bloodborne Pathogens
- Electrical
- Ionizing radiation
- Housekeeping
- Exits
- Confined space
- Oxygen/fuel gas storage
- General Duty Clause

OSHA Inspections

- Fatality / Catastrophe
- Complaint / Referral
- Follow-up
- Scheduled inspections
- National Emphasis Program
- Regional Emphasis Program
- Severe Injury Report

Employers **must contact** OSHA for:

- All work-related **fatalities** within **8 hours**
- All work-related **in-patient hospitalizations** of one or more employees within **24 hours**
- All work-related **amputations** within **24 hours**
- All work-related **losses of an eye** within **24 hours**

1-800-321-OSHA (6742)

OSHA Inspections

- No quota
- Evaluate safety and health programs
- Look for hazards
- Answer questions

Do you have a truly effective safety and health program?

- Clear rules and expectations?
- Employees understand the rules and expectations?
- An effective process to discover deviations from expectations?
- An effective enforcement program?

The general duty clause. Section 5(a)(1)

Each employer shall furnish a place of employment free of recognizable hazards that are likely to cause serious physical harm.

OSHA must prove

- Exposed employee
- Serious hazard
- Employer knowledge
- Feasible method to abate hazard

OSHA COVID-19 Pop Quiz

Yes = 1 point

No or I don't know = 0 points

Written COVID-19 plan?

- If you had more than 10 employees, you were supposed to develop a written COVID-19 plan in consultation with non-managerial employees and names the COVID-19 safety coordinator(s)?
- We will still ask for your written plan!

Screening

- Do you have a health screening protocol for screening employees before each work day/shift and screen and triage all clients, patients, residents, delivery people, visitors, and other non-employees entering settings where direct patient care is provided for people who may have symptoms of COVID-19?

COVID-19 log

- Do you have a log for recording all employee instances of COVID-19 that contains the employee's name, contact information, occupation, location where the employee worked, the date of the employee's last day at the workplace, the date of the positive test/diagnosis of COVID–19, and the date the employee first had a COVID–19 symptom?

Ventilation

- Is the amount of outside air for the heating, ventilation, and air conditioning (HVAC) system(s) maximized and do your air filters have a Minimum Efficiency Reporting Value (MERV) of 13 or higher and all air intakes cleaned and cleared of any debris?

Training

- Have you trained employees on COVID-19, screening procedures, personal protective equipment and the requirements of your COVID–19 Program?

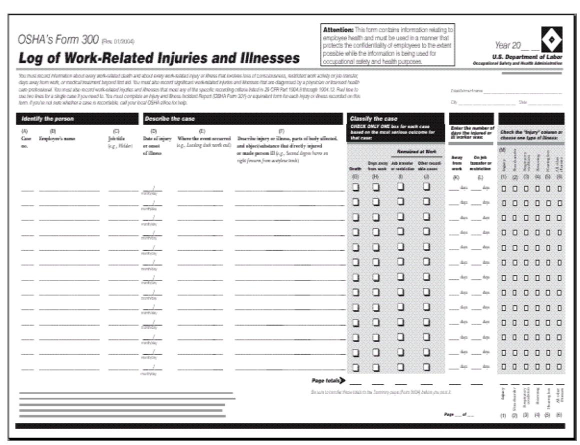
How did you do?

- A = 5
- B = 4
- C = 3
- D = 2
- F = 1 or less

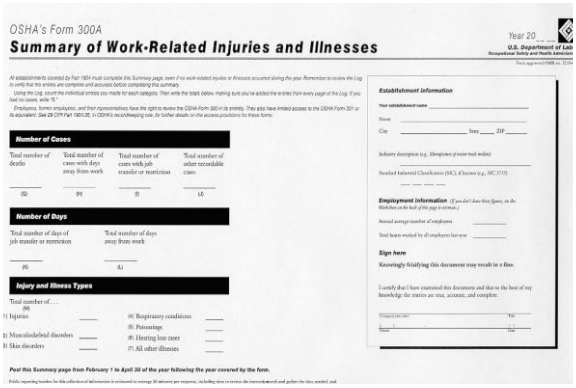
- Even minus 1 can result in a Penalty

National Emphasis Program Coronavirus Disease 2019

- OSHA 300 and 300A
- Exposure incidents, employees who contracted COVID-19, have been hospitalized as a result of exposure to SARS-CoV-2.
- Written COVID-19 plan
- Evidence of hazard assessment.
- Controls - physical distancing, barriers, etc.
- Respiratory protection program for COVID-19
- Personal Protective Equipment
- Training related to SARS-CoV-2 prevention.
- Engineering controls such as HVAC systems



OSHA 300A Form



OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

Year 20__

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

Form approved OMB no. 1218-0176

All establishments covered by Part 1904 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."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Number of Cases

(G) Total number of deaths	(H) Total number of cases with days away from work	(I) Total number of cases with job transfer or restriction	(J) Total number of other recordable cases

Number of Days

(K) Total number of days of job transfer or restriction	(L) Total number of days away from work

Injury and Illness Types

Total number of . . .

(M)	
1) Injuries	(4) Respiratory conditions
	(5) Poisonings
2) Musculoskeletal disorders	(6) Hearing loss cases
3) Skin disorders	(7) All other illnesses

Establishment information

Your establishment name

Street

City State ZIP

Industry description (e.g., Manufacture of motor truck trailers)

Standard Industrial Classification (SIC), if known (e.g., SIC 3715)

Employment information (If you don't have these figures, see the Worksheet on the back of this page to estimate.)

Annual average number of employees

Total hours worked by all employees last year

Sign here

Knowingly falsifying 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.

Company executive Title

Phone Date

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

Public reporting burden for this collection of information is estimated to average 50 minutes per response, including time to review the instructions and gather the data needed, and

Bloodborne Pathogens Exposure control plan - Annual Review

- **(c)(1)(iv)** requires the employer to review and **update** the exposure control plan at least annually (every 12 months) and whenever necessary to reflect new or modified tasks and procedures which affect occupational exposure and to reflect new or revised employee positions with occupational exposure.

Exposure incident documentation

- Exact location of incident,
- Task performed when the incident occurred,
- Engineering controls in use at the time,
- Work practices followed,
- A description of the sharps device involved,
- Protective equipment or clothing that was used at the time of the exposure incident,
- The employee's training.

Hepatitis B vaccination

- Made available within 10 working days of initial assignment at no cost to the employee.
- Declination statement (Appendix A)
- Three shot series.
- Efficacy of vaccination (CDC)

When there is occupational exposure

Paragraph (d)(3)

- PPE must be provided at no cost to the employee to prevent blood or OPIM from passing through or contacting work or street clothes, undergarments, skin, eyes, mouth, or other mucous membranes.
- **Laboratory coats**, uniforms and the like that are used as PPE must be laundered by the employer and not sent home with the employee for cleaning.

Information and training

- Accessible copy of standard (1910.1030) and explanation.
- Epidemiology and symptoms of bloodborne diseases.
- Explanation of the modes of transmission.
- Explanation of exposure control plan and how to obtain a copy.
- Recognition of the tasks which may involve exposure.
- Explanation of engineering controls, work practices, and PPE.
- PPE types, use, location, removal, decontamination, and disposal.
- Explanation of the basis for PPE.
- HBv efficacy, safety, administration, benefits, and offered free.
- Information on actions and contacts for emergencies involving blood.
- Procedures for an exposure incident, reporting and medical follow-up.
- Information on post-exposure evaluation and follow-up.
- Explanation of the signs, labeling, and color-coding requirements.
- An opportunity for interactive questions and answers.

Recordkeeping

- Annual training documentation requirements.
  - Dates of the training
  - Summary of the training
  - Names and qualification of the trainer(s)
  - Names and job titles of attendees
  - Training records maintained for 3 years.

Respiratory Protection Program

- Program Administrator
- Written program – selection process
- Medical evaluation
- Fit test
- Training
- Recordkeeping

Medical Evaluation

- **Before fit testing and use,** a medical evaluation to determine employee's ability to use a respirator.
- The employer shall identify a physician or other licensed health care professional (PLHCP) to perform medical evaluations:
  - using a medical questionnaire – Appendix C
  - medical examination
  - at no cost to the employee

Qualitative Fit Test (QLFT)

A pass/fail fit test to assess the adequacy of respirator fit that relies on the individual's response to the test agent.

Quantitative Fit Test (QNFT)

An assessment of the adequacy of respirator fit by numerically measuring the amount of leakage into the respirator.

Fit Test Protocol

- Use OSHA accepted protocol listed in Appendix A
  - QLFT Protocols:
    - Isoamyl acetate
    - Saccharin
    - Bitrex
    - Irritant smoke
  - QNFT Protocols:
    - Generated Aerosol (corn oil, salt, DEHP)
    - Condensation Nuclei Counter (PortaCount)
    - Controlled Negative Pressure (Dynatech FitTester 3000)
    - Controlled Negative Pressure (CNP) REDON

Facepiece Seal Protection

- No facial hair that interferes with the seal or function
- Employees wearing tight-fitting respirators must perform a user seal check **each time they put on the respirator** using the procedures in Appendix B-1 or equally effective manufacturer's procedures

hazard communication program

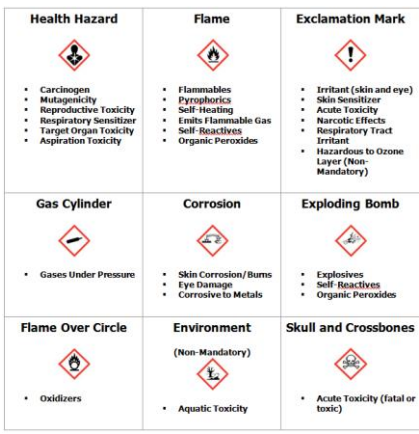
- Management **responsibility** for program
- Develop **list** of hazardous chemicals
- **Label** hazardous chemical containers
- Manage **Safety Data Sheets**
- Procedures for **training** exposed employees
- Address the hazards of **non-routine tasks**
- Procedures for **Multi-employer** workplaces

Employee information

- The requirements of the standard.
- Operations in their work area where hazardous chemicals are present.
- The location and availability of the written program, hazardous chemical list, and safety data sheets.

Employee training

- Methods and observations used to detect a release of a hazardous chemical (monitoring, odor, visual appearance)
- The physical, health, simple asphyxiation, combustible dust, and pyrophoric gas hazards, as well as hazards not otherwise classified, of the 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, SDS's, and how to obtain and use the information.

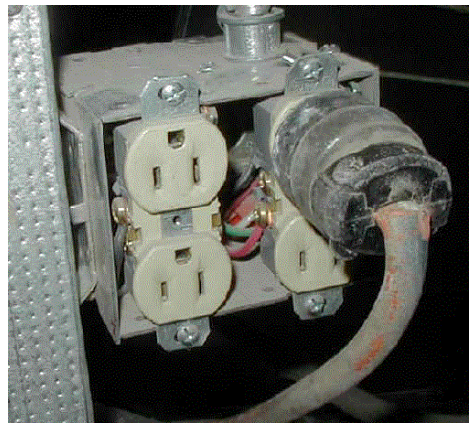


Inspection, maintenance, and repair

- 1910.22(d) - The employer must ensure:
- (1) Walking-working surfaces are inspected, regularly and as necessary, and maintained in a safe condition;
- (2) Hazardous conditions corrected or repaired before an employee uses the walking-working surface again. If the correction or repair cannot be made immediately, the hazard must be guarded to prevent employees from using the walking-working surface until the hazard is corrected or repaired

OSHA electrical standards

- Electrical equipment shall be free from recognized hazards that are likely to cause death or serious physical harm to employees.
- National Electric Code



Portable electric equipment including extension cords

- Visual Inspection
  - before use on any shift
  - for external defects (damaged insulation or parts)
  - for internal damage (crushed outer jacket)
- Removed from service if damaged.

Flexible cords and cables

- Flexible cords may not be used:
  - as a substitute for fixed wiring
  - through walls, ceilings, or floors
  - through doorways and windows
  - attached to building surfaces
  - concealed behind walls

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Ground-Fault Circuit Interrupter

- Protective device
- Detects difference in current between circuit wires
  (current leakage)
- The GFCI shuts off electricity flow <u>in as little as 1/40 of a second.</u>

Missing Grounding Conductor

Clear access

Blocked exit door

Lockout program

- Written Program
- Machine specific procedures
- Equipment to isolate
- Employee proficiency
- Periodic inspections
- Training

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confined spaces...

- Large enough and so configured that an employee can bodily enter and perform assigned work.
- Limited or restricted means of entry or exit.
- Not designed for continuous human occupancy.
  - Must meet all three requirements.

A permit-required confined space has...

- Potential to contain a hazardous atmosphere.
- Material that has the potential to engulf the entrant.
- An internal configuration that an entrant could be trapped or asphyxiated by inwardly converging walls.
- Any recognized serious safety or health hazard.
  - It is a PRCS if it meets any of the conditions.

Did You....

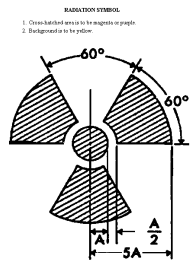
- Identify confined spaces and **prevent unauthorized entry**
- Post “Danger” signs or any other equally effective means inform of:
  - Existence
  - Location
  - Danger posed by the confined space.

Ionizing radiation

- Each radiation area shall be posted with a sign bearing the radiation caution symbol and the words:

CAUTION

RADIATION AREA



Radiation Survey

- An evaluation of the radiation hazards incident to the use, release or presence of radioactive materials.
- A physical survey of the equipment and measurements of radiation concentrations.
- A personnel monitoring equipment, such as film badges, pocket chambers, pocket dosimeters, or film rings.

Ionizing Radiation Information and Training

- Individuals working in any radiation area shall be informed of:
  - The occurrence of radioactive materials and of radiation in area;
  - The safety precautions to minimize exposure;
  - Provisions of the OSHA standard for the protection of employees from radiation or radioactive materials;
  - Reports of radiation exposure and that employees may request pursuant to the regulations.

General duty clause

- Section 5(a)(1),
  - Ergonomic hazards
  - Workplace Violence
  - Biological Agents
  - Hazardous Drugs
  - Latex Allergy

Questions?

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