

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



HAPPY HOLIDAYS

High Safety Consulting Services, Ltd. staff wishes you a safe and joyous holiday season (whatever your holiday may entail). I hope you enjoy special times with family and friends. We have so much for which to be thankful! I was recently sent a PowerPoint which noted...if you have food in the refrigerator, clothes on your back, a roof overhead and a place to sleep...you have more than 75% of the people in the world. I don't know if this statistic is correct, but I believe it's important to stop and consider our blessings. I hope you find a way to help those less fortunate and deserving of our compassion this holiday season. Thanks to all of our clients and customers whose patronage over the past year has allowed us to continue and expand our operations.

OSHA'S HEAD DROPS OFF!

The Secretary of Labor (Chao) has announced that Jonathan L. Snare has been appointed the acting deputy assistant secretary for the Occupational Safety and Health Administration (OSHA). Snare is replacing John Henshaw in this position who resigned early this month. It is not clear if to me if this is a temporary appointment or permanent – I am guessing permanent. In any case, Snare is a Texas attorney...who recently (2003) joined the Department of Labor as an advisor to the solicitor. This is quite a bit different background than what Mr. Henshaw provided as a Safety & Health Professional. What will this mean for those regulated by OSHA? – Its hard to say...Politically he is a republican. He has had heavy experience in election law (he didn't practice in Florida – if that's any consolation). He also has employment law experience. It will be interesting to see Mr. Snare's focus. Henshaw was Mr. Partnership – He entered into partnership agreements with many different organizations and programs. He also pushed OSHA staff personnel to obtain recognized certifications (CSP, CIH, etc.).

MACHINE GUARDING HAZARDS - \$150,000 in FINES PROPOSED

OSHA cited Elixir Industries, a manufacturer of aluminum extrusions for automotive trim for safety violations that contributed to the amputation of an employee's fingers. OSHA issued one willful citation to Elixir, with a proposed penalty of \$55,000, for allowing a defective mechanical power press to continue operating after being notified that repairs and maintenance were needed. The company also received three repeat citations, with proposed penalties totaling \$62,500, for failing to conduct required power press inspections and testing and for failing to train press operators. The agency also cited for other safety hazards, including lack of safety devices for power presses and failure to develop and implement a "lockout-tagout" program to render machinery inoperable during repair. Don't get caught with these problems ~ sign-up for our Press Seminar to be presented by Rockford Systems. We expect this class to fill, so early registration is a good idea. I am looking forward to attending this program, and if you have a press in your facility, you should be there too! High Industries, Inc. employees can register through the Safety & Health Department. All others can register on-line: <http://www.highsafety.com/hsl/Resources/Courses/default.cfm>

HOW FAR DOWN MAY I FALL?

The issue of fall protection continues to be fragmented and confusing to most people. A very simple question – "When do I need fall protection?" is not easily answered. The easiest (most sensible) way to answer this question is based on hazard. That is, when is it likely that someone will be injured in a fall event? This is also not an easy

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answer, because injury depends on body orientation, body weight, bone structure/density and the surface being impacted. Let's assume a concrete floor and a head-first fall. We can expect skull fractures to occur for nearly everyone at about 7.5 feet (99 percentile). About 1% of the population will have a skull fracture with a fall of just over 3 feet.

OSHA in most construction applications requires fall protection at 6 feet. This seems very reasonable based on the injury potential. In general industry however, railings are required around work platforms at 4 feet. These numbers should provide us with a guide for protection. Unfortunately, the construction industry has many different requirements for different trades and applications. Many of these allow fall hazards above 6 feet, and hence most fatalities (33%) in construction are....you guessed it....falls! So in construction, you need a railing around you if you're 6 feet above a lower surface, unless you are on a scaffold in which case you don't need fall protection until you are over 10 feet. If you are doing steel erection work you don't need fall protection until you are at 15 feet...unless you are erecting primary members or your are in a controlled decking zone, then the number goes up to 30 feet...Yes, steel erection people are legally allowed to fall up to 29 feet in some situations! Then there are the roofers...on low slopes (4:1 or less) they can use a flagging system and safety monitoring as fall protection. This is where one guy watches the workers and warns them if they are going to fall. He should also have a cell phone so he can call the coroner. There are also controlled access zones which can be used by precast erectors, bricklayers and leading edge operations. These areas are intended to limit exposure to other trades.

Fall protection on a ladder is not required by OSHA except of fixed ladders over 20 or 24 feet depending on whether you are doing construction or not, in which case a cage or ladder safety device is required. The reality is that there are several fatalities every year at work from people falling no more than the height of their body. Remember – Your safety program should be driven by what will protect people, not what OSHA requires.

TOE TIPS

Many of us take our toes for granted! Toes are used by the body to help provide balance and assist in walking by allowing the foot to push off the ground. Walk a few steps and take notice of how your toes push the foot upwards as you step. With proper prosthetics and depending on the type of injury, walking maybe reasonably restored in the event of a loss, although barefoot walking may present a problem. ANSI (American National Standards Institute) had a standard for the approval of safety shoes. (ANSI Z41) This standard however, is being withdrawn. The ANSI Z41 committee has moved over to the ASTM (American Society of Testing & Materials) standards organization under the F-13 committee (the one I belong to). So in the future, safety shoes will meet the ASTM, not the ANSI standard. OSHA rules specify ANSI compliance, so every shoe will be in "technical non-compliance". I'm sure OSHA will issue a letter of interpretation or some other such communication recognizing the ASTM standard.

Also along these lines the new ASTM committee has done away with the #30 rating for safety shoes. When you purchase safety shoes and ANSI Z41 rating is followed by a number #75, #50, #30. These numbers refer to the testing forces (ft-lbs.) used to test the shoe. (The higher numbers, indicate a higher test force). I have always suggested at least #50 be used and now, this will be the lowest rated shoe. If you have electrical or maintenance employees who could have exposure to electric...you should obtain shoes rated for electrical exposure. These are still permitted to have a metal tip, so assuring that they are properly maintained – no metal breakthrough -- is important. Your safety shoe policy should indicate which type of shoe is acceptable.

Finally, I often am asked, when should I required a steel tip or metatarsal shoe? My position on this is to consider that ANSI approved shoes for 30 ft-lbs. If you drop something from a typical height of use (ie, waist high) what is the force generated. For example, if we assume 3.5 feet for waist height, then an 8.5 lbs. object would generate about 30 ft-lbs of force. Consider a common brick weighs about 4 lbs. Would you want to have a brick dropped on your foot without a safety boot? Probably not! If people are regularly handling objects in these weight ranges, I believe it is reasonable to consider safety shoes. You should consider the history of foot injuries in your operations. Look at the OSHA logs to determine if injuries are occurring to feet and ankles. If they are, safety shoes are appropriate. Remember that in General Industry settings you must have a written Personal Protective Equipment (PPE) hazard assessment certification on file. This certification must include the signature of the person performing the assessment.

UPCOMING TRAINING PROGRAMS presented by HSCSL:

We have a full list of training offerings for 2005 available on our web-site. Register on line and review course schedules at <http://www.highsafety.com/hsl/resources/courses/>

Slips, Trips and Falls (February 17, 2005) This lunch-time seminar is being presented by Steve High and offered by the Lancaster County Industrial Safety Council. Contact Craig Schroll at (717) 354-2411 or Craig@FIRECON.com for more information.

Safety Culture Assessment (March 17, 2005 **OR** April 21, 2005) Steve High will be presenting in "The Big Easy" (New Orleans) for this event sponsored by Captive Resources. You **MUST** be a member of Captive Resources to participate in this program. Contact us for more information.

OSHA 10 Hour Construction (April 6 & 13, 2005) at Associated Builders' & Contractors (ABC) in Manheim PA. Call ABC directly for registration information at 717-653-8106. Discount for members.

Safety and the Bottom Line (May 10, 2005) This presentation by Steve High will be held as part of the Bureau of Worker's Compensation Conference at the Hershey Convention Center in Hershey, PA. Contact us for more information.

NOTE: All of our prior newsletters are archived on our website under the "Contact Us" Tab

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