

# SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



## THE DOG DAYS OF SUMMER

### CLOSE ENCOUNTERS OF THE CANINE KIND

I hope you are enjoying your summer with outdoor activities. I've been taking pleasure in watching the days fade off as the sun falls to the horizon from my deck. It is a beautiful site. I've also been jogging regularly to help keep the impending expansion of my mid-section. During my runs, I have the occasion to run past and sometimes into a resident's canine pet. Now I know that they say a dog is man's best friend....this may be true from some men, but some of these 'friends' sound like they are about to tear my leg off. My first indication of the danger level is the bark. If it is a yappy high-pitched bark, I figure I can fend it off if necessary. If the bark is deep, I then try to see if the beast is tied to something sturdy....usually not. At this point my heart speeds up and my jog becomes a little bit more like a sprint. I avoid eye contact and move to the opposite side of the road. Most times this approach is successful and I arrive home in one piece. One day I turned down a dirt road, passed an old farmhouse and then I heard it, Kujo – the dog of war!....I heard the dragging chain and the snarling...he was right behind me and I was going as fast as I could and he was gaining on me....I never looked back...some how I escaped...the worst part, the road dead-ended – The only way back was past Kujo – I wasn't going through that again. – I walked through several farmer's fields to find a roadway to safety.

Pleas of a runner: If you have a dog leash it while outside or be in attendance of it while it is outside, unleashed. If you have an invisible fence, let me know by putting up some indication of this. There are leash laws in many areas that require dogs be restrained or controlled.

According to the LA County Animal Services, prevention of a dog attack includes avoiding eye contact, NOT running or screaming (hey, I was jogging first), telling the dog in a loud voice to "go home" (If it's a German Sheppard do you say "nach hause gehe"?), and backing away slowly. If the dog attacks – "feed" it a purse, bag or anything else (I wonder if my sweaty tee shirt would work?). Climb up a tree or on top of a car (Hadn't considered that one!). If you go down, cover your head with your fist (at this point, a prayer might be a better bet!).

Here's a link from the LA County Animal Services that summarizes the whole deal:

<http://www.laanimalservices.org/thinkdogmayattack.pdf> (You'll need Adobe reader to open it). Many service people and emergency response personnel face this risk when they enter the homes of their customers. A dog perceives the intruder as a threat and attacks. In talking with an animal control officer of a small city, he explained that many drug dealers train dogs to be attack dogs to protect their wares. This approach prevents weapons violations and is probably more effective.

### WHAT'S THAT RACKET?

Under 29 CFR 1910.95, OSHA requires that employers do not expose workers to noise levels above 90 decibels (dB) over eight hours of exposure. When noise levels reach 85 decibels time-weighted-average (TWA), the employer must offer hearing protection, have a written program, provide annual training as specified in the regulations and conduct audiometric testing of employees hearing acuity each year. Noise exposure is averaged over time, like most chemical exposure assessments. Noise levels of 115 decibels for more than 15 minutes per

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day will result in an over-exposure to noise, even when the rest of the day is spent in a library. Many companies are working ten or twelve hour shifts, when this occurs the exposure period must be adjusted as well. Exposure to 90 decibels over a twelve hour period is equivalent to nearly 93 decibels of exposure for eight hours. By the way, since decibels are a logarithmic measurement a 3 decibel change is significant and represents a doubling of the noise intensity! While OSHA uses 90 decibels as the limit with guidelines for control at 85, the American Conference of Governmental Industrial Hygienists (ACGIH) has set their exposure limit at 85 dB. OSHA requires re-monitoring of the work environment when there is a change in production, process, equipment, or controls such that additional personnel could be exposed or the hearing protection provided may no longer provide the needed protection.

Remember too that the Noise Reduction Rating (NRR) on the hearing protection devices must be reduced by 7 dB for determination as to its effectiveness for the noise exposure. There are about seven different ways to adjust the noise level that I know of, but in all cases, you can not just use the NRR alone to determine the noise reduction. It is also a good idea to have an octave band assessment of the noise, so that you know which frequencies are the most prevalent, this can help in selection of hearing protection devices which provide attenuation frequency distribution data. In addition this information can help identify sources of noise as well as control methodologies. If you are seeking to put a damper on the racket in your workplace, we can provide monitoring, training, program and noise control solutions.

### **INTERPRETATION ON RESIDENTIAL CONSTRUCTION ISSUED**

A letter of interpretation (LOI) issued 5-17-04 has clarified that masonry walls in residential-type construction does NOT fall under the residential construction STD directive (STD 03-00-001). Normally residential construction has its own set of rules regarding fall protection. This was extended to include residential-type construction where the construction techniques in use were generally similar to the construction methods in residential construction. Stick building is the key here. The letter goes on to explain that the difficulty in providing fall protection in wood frame structures was the purpose of the STD and that use of these alternate fall protection methods is not acceptable if masonry walls are used. This STD basically allows the use of slide guards and fall awareness in place of more effective fall protection methods which increase the risk for the residential contractor...but most don't even follow these requirements. If you'd like to read the entire LOI:

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=24847](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24847)

### **HEY! – I'M TRYING TO RUNNING A BUSINESS HERE!**

Too many times we fail as safety professionals to make the business case for what we do. It is imperative that we learn the language of business! You should know how to calculate a cash flow, and internal rate of return (IRR), or any other standard measure your organization uses to assess business opportunities and capital investments.

I hear business owners, employees, and others complain about the requirements imposed on them in the sake of safety. As safety professionals we need to be team players in the organization to make it successful. This means we should be looking for opportunities to ply our trade to improve operational efficiency and reduce cost. In this way we can become a valuable management team member rather than the "safety dude" with idealistic views on injury prevention.

We also need to use the same tools as the rest of the management group to sell our ideas. If an injury prevention measure costs \$ 50,000 to implement and has a realized internal rate of return of 4%, it is likely better for the organization to spend this money elsewhere. In addition, as a safety professional you should realize that use of the company's limited resources must be effectively. Could this \$50,000 be used to address another safety issue which has a better return (and therefore a better ability to reduce injuries)?

I've seen safety driven too far for the sake of safety and an over-zealous "safety director". I've also seen safety driven underground because of a safety director that couldn't demonstrate the business value of safety. It isn't always easy to make the connection between the business measures and safety, but there are ways to do it. The more this connection is made, the more safety becomes part of the business operations. But you must use business methods to gain the attention of management. Call us for more information on how you can connect safety to the business process.

## **SURVEY SAYS...**

Are you looking for the next step in safety? – We started by measuring accidents to determine how to stop them. Then we moved to near-misses in an attempt to get ahead of the curve and prevent injuries. Then behavioral-based safety showed up, where we monitored, tracked and reported the frequency of safe and unsafe acts which lead to injury events. This is getting closer to measuring safety performance, rather than a failure of the safety program as accident counting does.

Now you can go one step beyond this! Safety cultural surveys attempt to measure what's in the employees' minds in regards to safety performance and attitudes. Cultural surveys can help identify problems that otherwise would never be known. They can drive safety strategic planning efforts. They can assess the effectiveness of safety leadership of individual departments and groups. They can act as a benchmark to which future assessments can be compared. High Safety has recently developed a safety culture assessment process. This process was used to assess a multi-lingual, multi-shift workforce and the results were exciting! The company discovered attitudes within individual departments and by individual supervisory groups that previously were unknown. These findings will be used to drive performance planning for supervisory groups and improve safety performance.

"Perception is Reality"...what is the reality of your safety and health management program? Call us to learn more about this insightful assessment process.

## **2004 STANDARDS**

The OSHA 2004 Standards are here for now. --- They are flying out the door! They are still at the same very low price with lots of new features! To order: <http://www.highsafety.com/hsl/resources/catalog/> The construction standards are great for your job site superintendents to have on hand.

## **UPCOMING TRAINING PROGRAMS presented by HSCSL:**

See our training page for more details on the following programs: <http://www.highsafety.com/hsl/resources/courses/>

Practical "Hands On" Industrial Hygiene (August 23-25, 2004) Three-day course. Allows participants practice sampling for noise, dust and vapors. Students will also practice interpreting laboratory results and calculating 8-hour TWAs. Nothing else like it!

OSHA 10-Hour General Industry Course (September 13-14, 2004) Two-day, OSHA-authorized course. 2.0 ABIH CM points.

OSHA Instructor's Course for Construction (September 20-23, 2004) Four-day course. This program will be offered through the Keystone Occupational Safety and Health Center (KOSH) – an Authorized OSHA Training Institute. Call them at (800) 318-4846 or visit their website [www.koshcenter.org](http://www.koshcenter.org) to register.

Slips, Trips, and Falls (October 14, 2004) Presentation given by Steve High at the Northeastern Regional Occupational Health & Safety Conference & Expo in Wilkes-Barre. Call us toll-free at (877) 285-1129 for more information.

OSHA 30-Hour General Industry Course (October 18-22, 2004) Five-day, OSHA-authorized course. 4.5 ABIH CM points. Tour a VPP STAR site as part of this course.

OSHA 10-Hour Construction Course (November 15-16, 2004) Two-day, OSHA-authorized course. This program will be offered through Associated Builders & Contractors (ABC) Keystone Chapter. Call them at (717) 653-8106 or visit their website [www.abckeystone.org](http://www.abckeystone.org) to register.

Topics in Safety Management (December 2-3, 2004) Two-day course. Designed for the safety manager with five or more years experience in the safety field.

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

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