

# SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



**OCTOBER 2008**

## **SAFETY EDUCATION ENERGY - IT KEEPS GOING AND GOING AND GOING...**

(adapted from an article I wrote in the ABC Spokesman)

Below are some training opportunities for you or individuals in your organization that you may wish to consider.

Recently I traveled North with our family to check out New York University, Boston University and Boston College. Already, my little girl is picking a college to attend. Where did that time go? One of her criteria is a place that is far away from home and that ideally is in an urban setting. She really wants to be independent or she can't stand her parents... or perhaps a little of each! I am proud that she has done so well in school and it presents many opportunities for her moving forward. Her mother will quickly inform anyone who asks (and some that don't)... that she didn't get that from her Dad! I have to agree to some point. It is hard to believe that twenty-two years ago I was graduating from college. My head packed with information that I didn't fully grasp and in many cases really didn't care to grasp. As an EMT, I was interested in emergency medicine, but it wasn't until I took a class in occupational safety that resulted in a new passion that would fill the next 22 years of my life. My education continued with a blend of experience and intense self-education... I continued on to complete additional advanced education in safety with dedication. Recently, I started course work in epidemiology and bio-statistics (The branch of medicine that deals with the study of the causes, distribution, and control of disease). Education should never stop. There is so much to learn in this big wonderful world, that it is overwhelming while at the same time exciting! Creating an environment for learning in your organization is important for success and growth.

If we stop learning, we stop growing and expanding our minds. Safety education must be on-going. Education helps to develop a safety culture that becomes a way of thinking, rather than a summary of information presented for consumption... with the hope the participant chooses to consume and apply the information. We have to create a passion around safe performance and education is one process that can help to do that. Education helps to achieve a based from which everyone can relate. But like that pink, drum-beating bunny, it must continue... on and on and on. Everyone must hear the drum. If our teams are marching to the same beat... we can move forward to injury-free and positive safety cultures.

## **HIGH SAFETY CONSULTING SERVICES LTD UP-COMING TRAINING OPPORTUNITIES**

**OSHA 502 UPDATE FOR OSHA CONSTRUCTION INSTRUCTORS** will be held at our offices in Lancaster, PA. The program is sponsored by the Mid-Atlantic OSHA Training Institute. The program will be held OCT 22 to OCT 24. Instructors must attend an update program every four years. CALL US for information on registering for this program. (S)

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**OSHA 30-hour General Industry Course** will be held on November 3 to November 6 at our offices in Lancaster, PA. This program will provide students with an in-depth education on OSHA requirements as it applies to general industry settings -- fixed plant environments (S). Register on-line at [www.highsafety.com](http://www.highsafety.com)

**Fall Protection & Scaffold Users' Class** will be held on November 4 at Associated Builders and Contractors in Manheim, PA. This program will cover the OSHA-mandated training requirements for those on construction sites who will use scaffolding or fall protection. This program is intended for the users of this equipment. The class is scheduled from 7:30 AM to 11:30 AM. If you are an ABC member, register on-line or by phone 717-653-8106. If you are NOT an ABC member, best pricing is available by registering on-line via our website: [www.highsafety.com](http://www.highsafety.com) or by calling us directly.

**Rough Terrain Forklift Operators Course** will be held on November 18 at Associated Builders and Contractors in Manheim, PA. This program will cover the classroom educational requirements for operators. Hands-on, observational training forms will be provided to the company representatives to complete the training requirements to meet OSHA rule. The class is scheduled from 7:30 AM to 11:30 AM. If you are an ABC member, register on-line or by phone 717-653-8106. If you are NOT an ABC member, best pricing is available by registering on-line via our website: [www.highsafety.com](http://www.highsafety.com) or by calling us directly.

**COST-JUSTIFYING SAFETY** is a mini-session held at our offices on December 15 from 8AM to 10AM. The session cost is \$25. Money is the language of business. How can we transfer the language of safety into the language of business? This session will present some basic conceptual approaches to this challenge along with some ethical considerations. Register on-line (P)

**CPR & FIRST AID** training is required in most work applications where immediate medical help is not available around the clock. A response time of less than 4 minutes is required by OSHA in most scenarios and is the response that will be necessary to make a difference in medical outcomes for someone who is seriously injured or ill. This program will cover adult CPR, AED Use and the principles of First Aid. Renewal is required every 2 years. American Heart Association Course which includes text, training CD, a top-of-the-line CPR Mask and Barrier Kit in a handy carrying case. Register On-Line. (P)

*You may note the letters behind the course descriptions. A "P" indicates that the program is pending until enough registrants sign-up to run, while "S" indicates that the program has enough registrants to run currently. Courses with no indicators are run by ABC and we don't have the current status on these courses. If this is of interest, feel free to contact them or us for more information. In the event of cancellations from programs marked "S" we reserve the right to reschedule and/or refund course fees. See out course policies for more details.*

### **NEW PROPOSED DRAFT STANDARD FOR CRANE OPERATIONS ISSUED**

For the first time I can remember, OSHA has issued a "draft" proposed regulation. Typically when a standard is proposed it comes out as "proposed". This new in-between release I presume gives individuals an opportunity to become familiar with the extensive requirements. At this point, OSHA is NOT accepting comments. But that is just fine. -- The document that was issued encompasses 1110 pages. The actual standard within this draft is a mere 250 pages. As much as I love to read OSHA standards... I haven't dug into this one yet, but it is on my list of "TO-DO's". I've also learned that a proposed standard may look nothing like the final standard... so a draft proposed standard is perhaps more likely to change... but the rule was developed with a consensus approach which should minimize discord and improve acceptability (???). In any case, OSHA is under pressure to create something. Many states (like New York) have already moved forward in creating licensing requirements for operators. There is a bill that was just signed into law in Pennsylvania requiring crane operators to be licensed. This will require many to obtain formal Crane Operator Certification (CCO) which will be accepted by the state. Some smaller crane types are exempted from requiring a license. House Bill 647 is the reference. Once I have the opportunity to wade through these new requirements, I'll share observations and comments... but it could be awhile! One important piece that I noticed is the expansion to a 20 foot approach distance for overhead lines vs. the 10 foot rule in the OSHA rule. There are many more details on assembly and disassembly that are provided. We will plan to offer a training program for those that might be interested in understanding the pending new requirements.

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## **A WASTE OF TIME, MONEY AND EFFORT - BECOMING AN EFFECTIVE USER OR PROVIDER OF SERVICES**

One of my basic premises in life is that people are human and once in awhile we all screw-up. In fact, it is part of the learning process I discussed earlier. Or as President Bush tried to say... Fool me once shame on me... but you can't get fooled again! <http://www.youtube.com/watch?v=eKgPY1adc0A> See the link for this entertaining quotation!

See we really do all make mistakes! Mistakes in general are okay when we learn from them. Mistakes in safety can have very serious outcomes when critical exposures are at hand. This is why it makes sense to be each other's keeper and seek input from others on safety and health issues. This is a luxury our group has with our team members. I would like to share with you that I seem to continually run into common problems with industrial hygiene reports done at companies with whom we start to work. If you are going to have a noise survey done or an air quality survey done, there are a few basic things you MUST have in your report. First off, if the report is 3 pages long (including a cover page!) - the report is likely worthless. This is not always true, but is usually true. An effective report requires certain pieces of information that often can't be included in two or three pages of information. Here are a few pieces to check to make sure you've received an adequate report on hygiene related services (noise, air quality).

1. Does the report explain exactly the activities the employee was performing during the monitoring? A job title is nice, but specifically what activities were performed, what materials were used, where did the employees go and how long were the activities performed? What tools were used and what variations were there in the normal workday activities? If someone placed a dosimeter on an individual and never checked on the work activities throughout the day, the result will be less useful. Without detailed information, your survey report is worthless to defend a claim or to really determine the exposure levels to a specific activity.
2. Stationary monitoring has no bearing on employee exposure in most cases. If you intend to set up a dosimeter or pump in one location (or your provider is), you should have a good rationale for why you are doing this. I won't get into the possible scenarios where this makes sense, but it can at times.
3. What PPE was being used during the monitoring? It should be in the report. "e.g. Employees work a N95 Respiratory while dumping the product into the bin. They removed the respirators for the rest of the operation."
4. What calibrations were done on the equipment and the calibrator? What are the last dates for calibration?
5. What sampling method was used for the analysis and collection? (NIOSH, OSHA)
6. If a laboratory was used, what is the accreditation of the lab? Are they accredited for the type of analysis performed? Just because a lab is accredited in one area (ie: microbial) doesn't mean they are accredited in other areas.
7. What recommendations were made? If exposures are shown, recommendations should be provided to reduce exposure, rather than protect employees using PPE. If there are no exposures, perhaps no recommendations are needed.
8. What compliance obligations exist and are they identified in the report? A report that states the lead level exceeded the Action Limit is fine, but it doesn't specifically tell you what you MUST do under the Lead Standard. If you are having a chemical tested which has specific regulatory mandates, request that recommendations include a complete summary of what is required to meet these standards based on the results.
9. Does the report provider offer a peer and CIH review? This may be at an additional fee, but the peer review or CIH review adds credibility to the report by including two different opinions on the process. It is probably most helpful to request a pre and post peer review. This will allow for a consult on the sampling plan and then a review of the work at the end of the process. If your report will carry legal significance, I would suggest that this be included as a requirement for best results.
10. If the workforce is working non-standard shifts (10 - 12 hr) or work environments -- has this been factored into

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the comparatives to established and permissible limits properly? Has skin up-take been considered as part of the complete exposure picture if applicable? Are you only "in-compliance" because you or others misinterpreted the results as being below the PEL or AL?

Finally, consider treating safety and health services as other services your company contracts. Establish a summary of requirements for providers. This can include anything from confidentiality statements, insurance requirements (like do they have some or more specifically what limits)..to requirements of the provider to what must be included in the report. Perhaps I am making our job more difficult by suggesting these things... but in reality, don't you deserve to receive a specific outcome from services provided? I think so. --- I feel frustrated by situations wherein work is performed that is not useful to a client or just incorrect, but provided by the lowest cost provider. If we can assist you with our comprehensive approach to hygiene monitoring, let us know!

## **WE DO CUSTOMIZED TRAINING AT YOUR SITE OR OURS**

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



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