

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



SAFETY / OSHA UPDATE – November - 2003

CONSTRUCTION SAFETY QUESTION

I had a good construction question posed to me that I thought I'd share with you: "On many construction sites I notice contractors using an aerial lift to gain access to a roof. Is this OK, where in the standard does it refer to this situation?"

My Answer:

From an OSHA standpoint, this is addressed in a letter of interpretation:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24311

I copied the key question in this interpretation which is below:

"Question (1): Do the OSHA standards permit employers to use aerial lifts to transport workers to and from elevated work stations where the basket is either set down on an elevated surface or placed at the edge of a structure?"

Answer: OSHA standards do not prohibit employees from exiting or entering an aerial lift basket that rests on or adjacent to an elevated surface. Section 1926.453(b)(2)(v) requires that employees working from aerial lifts be tied-off. On the other hand, when employees move from the basket to the elevated surface, the requirements in 29 CFR Part 1926 Subpart M apply. In particular, §1926.501(b)(1) requires fall protection at 6 feet above a lower level. A worker may enter or exit an aerial lift (at heights above 6 feet) provided that fall protection such as guardrails or a fall arrest system is used while the worker moves between the lift and the working surface. A fall arrest system and its components must meet the criteria in §1926.502(d). During entry to and egress from the lift, a worker may tie-off to the lift (if the lift is designed to withstand the vertical and lateral loads imposed by the employee's movement itself or by an arrested fall) or to an appropriate nearby structure."

The other considerations from a SAFETY standpoint are: (1) what is the safest method of access and (2) what is a reasonable approach to access and egress. If there was an emergency situation on the roof top, how would the employees get down? If there are 1-3 people and the lift can move these individuals down (based on capacity)...then I'm not too concerned as long as fall protection is provided during the transition process. OSHA requires the use of two ladders once 25 people or more are working on an elevated area to facilitate exit. I don't believe it would be safe to have a host of people working on an elevated surface with a single lift being available for exit from the roof top. The best option certainly is a fixed stairway with railing systems and proper support, but this may not always be practical.

HIGH SAFETY CONSULTING SERVICES, LTD.

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NEW PRODUCTS ADDED:

High Safety Consulting Services, Ltd. now carries Tramex™ moisture meters. We also now carry Fosters microbial cleaner. Visit our product catalog: <http://www.highsafety.com/hsl/resources/catalog/> for more information.

OSHA RELEASES MOLD GUIDANCE

OSHA has basically adopted already existing consensus standards (NYC DOH, EPA) on mold remediation. The guidelines don't create any new obligations for employers, but they help to confirm that the use of these guidelines is current industry practice. The document is available at: <http://www.osha.gov/dts/shib/shib101003.html>. This document was just issued this month. AND...it's not always mold... Indoor Air Quality investigations go beyond looking for mold. While fungal growths have received a lot of attention lately, there are 100's of other potential sources of poor indoor air.

NEW 300 FORM FOR 2004 NOW AVAILABLE

The revised OSHA Form 300, Log of Work-Related Injuries and Illnesses is now available on OSHA's website at:

www.osha.gov/recordkeeping/new-osha300form1-1-04.pdf

The forms have changed slightly for the new year to make them 'easier' to use.

ARE YOU UP TO SPEED ON NFPA 70E?

NFPA 70E, while a consensus standard, has received a lot of attention by companies. The standard NFPA 70 (also known as the National Electrical Code – NEC) has a section (E) which addresses arc flash protection. When you consider the impact that arc flash can have, it makes good sense to take a look at this standard. The standard gets fairly technical including moderately complex calculations for determining the potential arc flash boundary depending on the available fault current, voltage, arc time (based on the cycle time of the circuit interruption device). If an employee needs to enter the flash boundary, then special PPE needs to be worn. The type of PPE depends on the amount of energy to which the employee is exposed. There are also established boundaries: Limited Approach, Restricted Approach, and Prohibited Approach that are established. These mesh pretty well with OSHA's electrical work protection requirements under 1910.333 to 1910.399. – but go far beyond these requirements. Perhaps one of the best sources I found for this information was at:

http://www.bussman.com/library/docs/safety_basics_book.pdf

One copy of this booklet can be downloaded for individual use for free. The book can not be copied or distributed. Of course you will want to review the NFPA 70E standard as well.

ENGINEERING SERVICES

Some of our clients don't realize that High Safety Consulting Services, Ltd. can also provide engineering analyses for typical safety projects. These include fall protection anchorage systems, floor cover capacities, and similar analyses. One common application: OSHA requires that storage mezzanines be marked with capacity when used for storage. This applies to "supervisor offices" in the plant that have a pile of stored items resting above the supervisor...with an unknown and unmarked capacity.

UPCOMING TRAINING PROGRAMS presented by HSCSL:

Rough Terrain Forklift Training Course November 11 (8-12) Course at ABC in Manheim, PA. Call them directly for registration 717-653-8106.

OSHA Compliance – Checking the Crystal Ball Held at the Lancaster Chamber – November 6 from 8:30-12:30. Visit www.lcci.com or call them at 717-397-3531.

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A Pragmatic Approach to Mold Remediation November 18 4PM to 6PM. Delaware Chamber of ABC. Call 302-328-1111 to inquire. Curt Wittman will be discussing some reasonable approaches to mold issues.

Mold Management November 12 at the *Baltimore* Engineering & Industrial Show. A second session on November 20 at the *Greater Philadelphia* Engineering and Maintenance Show. Call us for free tickets. We will have a booth at these shows as well.

OSHA 10 HOUR Construction (November 17 & 18) – 1PM to 6:30 PM each day. Held at ABC in Manheim, PA. Call them directly for reservations: 717-653-8106.

OSHA 30 HOUR Construction (January 2004) Wednesdays and Fridays. 7:30 AM to 2:30 PM. Held at ABC in Manheim, PA. Call directly for reservations. 717-653-8106. Note: If you are considering the next course, this is one of the pre-requisites.

OSHA Instructor's Course for Construction (Sept, 2004) Week of the 20th. This program will be offered through the Keystone Occupational Safety and Health Center (KOSH) – an Authorized OSHA Training Institute Site. Also, we are offering an instructor update for construction instructors in February, 2004. <http://www.koshcenter.org/currentcourses.htm>

We are in the process of developing our training schedule for 2004. These programs will be posted on our website.

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



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