

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



SAFETY TRAINING – A BIG WASTE OF TIME

Training is one of the *least* effective means to control risk. It is time consuming, often expensive and frequently fails to change behavior significantly. You might find it odd that the president of a consulting company which derives 25% of its sales revenues from training activities would make such a statement.

The reality is that superior safety performance is best achieved by using safety engineering and job planning solutions which eliminate or otherwise control a hazard. Training is focused at an individual level and usually attempts to achieve a change in behavior through hazard awareness. If the training is supported on the job through cultural norms, rule enforcement and supervisory coaching, a behavioral change is possible which can reduce risk for your company.

In order for training to be effective it must be integrated to the work processes. For this reason, it is important that all levels in an organization participate in safety training, especially management personnel who are in a position to help support and implement procedural changes within the company. Safety is not just for the person doing the work. In fact, supervisors and managers can do more to influence safety in an organization, but if they don't understand the operating hazards, this opportunity will be missed.

A worker who receives training on the requirements for inspecting a forklift will not implement this change unless the company has a process for reporting mechanical defects, recording the inspection results, and holds the employee accountable for performing the inspection.

Some of the OSHA rules require annual training, but most base the requirement for re-training on one or more of several conditions which may include: changes in worksite hazards, change of personnel, new equipment being introduced into the workplace, observations of improper performance, incidents or accidents, or 'as often enough to maintain competency'. Because not every hazard can be controlled by other methods, training is needed to fill in the gaps.

I conduct many educational programs on accepted safety procedures and processes. Employees sometimes respond with comments such as, "Tell the supervisor that we have to do that"; "You should be talking to the management not us!" or "That won't happen here" – referring to the implementation of safe work practice. Too often training is conducted in order to meet a perceived obligation by the employer, without creating the structures that are needed to support the practices which are reviewed in the training. In the next issue, I will highlight some of the most important training requirements specified by OSHA.

SCAFFOLDS REQUIRE A COMPETENT PERSON

OSHA's construction standards require that a competent person oversee the building, movement, or dismantlement of a scaffolding system. I had the occasion recently to observe two situations. One was a drywall contractor who managed to rig up a 2x9 board with some nylon rope attached to a metal pole on one end and a few 10 penny nails holding up the other end. The board served as his scaffold. Job-built scaffolds must be constructed to provide for four times the intended load. I ascertained that this individual was not competent in the construction of scaffolding

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– or he would have *never* considered walking on this. The second observation was during the completion of a five-story scaffold. The individuals raising the scaffold were climbing up and down the walk-through section of the tubular scaffold as well as climbing on the cross braces rather than using a ladder. The scaffolding was not tied back every 4x minimum base in the vertical nor every 30 feet in the horizontal. The safety representative I was with had the foresight to immediately stop this operation and make corrections.

The individuals on site had little understanding of the requirements for safe scaffolding construction. In drawing a comparison between these two situations, it highlighted the importance of a recent OSHA initiative – Hispanic outreach efforts. In both cases the individuals involved were Spanish-speaking and had little ability to understand what they needed to do. Since my Spanish consists of only a year in high-school and not one of my better subjects (not sure I had a “better” subject), communication proves difficult. Shortly thereafter, I heard a story on public radio in which a bilingual teacher had developed picture cards around several different topics which could communicate basic concepts to anyone. These were developed for the hotel industry in order to bridge the language barriers. I thought this was a novel concept to address this challenge.

HANG IT UP

Occasionally, I find fire extinguishers sitting on a ledge. While this is not desired, it is not necessarily a violation of OSHA rule. However, I was curious as to the hazard associated with this practice...particularly if the extinguisher would fall from an upper ledge – could the unit dangerously release its pressure? I asked Kidde fire extinguishers and this was their response:

Kidde specifies on the nameplate that portable fire extinguishers be installed and serviced according to NFPA 10. In NFPA 10, section 1.5.7 states "shall be installed securely on the hanger, or in the bracket supplied." Section A.1.5.7 states "In situations where it is necessary that fire extinguishers be provided temporarily, a good practice is to provide portable stands on which the fire extinguishers can be hung."

To insure that the fire extinguisher is not damaged and is ready to be used in the event of a fire, Kidde can only recommend it to be mounted in the bracket or hanger supplied which is securely fastened to a support. A compromise is to do as in section A1.5.7 and have portable stands.

So, while this doesn't necessary address my question of hazard, it certainly makes sense for extinguishers to be mounted securely. An extinguisher falling from a ledge, could damage the shell, the pressure gauge or a foot.

NEW PRODUCT AVAILABLE

We are always looking for new products that can help our clients. We recently added some stock of a new mold-abatement product, Sporidicin®. The product is lower priced than the well-known Fosters product. It also is available in smaller quantities (a 1 gallon jug or a 22-ounce spray bottle). It has documented studies showing effectiveness on various mold species. If the “gold” standard (Fosters) is too expensive, consider this as an alternative.

We still find other consultants and individuals attempting to clean mold with household bleach. In fact, I recently saw a news feature touting the use of bleach for mold. The problems with bleach include (1) Sodium Hypochlorite is nasty stuff – It causes burns of the upper respiratory tract, causes dermal irritation and potentially could create a more serious air quality concern (2) Chlorine molecules are very reactive and disassociate quickly. On a porous material, the chlorine will quickly move to a gas and as a result, may not penetrate to the hyphae of the fungus, allowing the mold to return. Remember that any product labeled as a “mold-killer” may kill the mold, but the protein particles of the fungi (associated with allergenic responses) may remain.

If you have questions about air quality issues or fungal contaminations, e-mail: Curt Wittman, MS, CIH.

CERTIFIED SAFETY COMMITTEES DROPPING LIKE FLIES

If you have a certified safety committee in PA and you are taking advantage of the 5% discount on your insurance, you might want to perform a self-audit – before the state does! When compared to other states, PA has a rather limited enforcement effort in place for many of their programs. One of the areas that State has moved forward has been in the review of certified safety committee status. The State set a goal of 300 audits for 2004 and I believe they are still on track with this goal. The audit determines if the committee still meets the certified status. 85% of the audits are showing deficiencies and committees are losing their certified status. Primary problems include:

1) Failure to have a written agenda or minutes. 2) Failure to hold 12 meetings per year. 3) Failure to have a quorum, 4) Failure to have ANNUAL training by a qualified accident and illness prevention provider (as defined by the State) in the topics of Accident Investigation, Hazard Identification and Committee Operations. If you need help meeting these requirements or if you want to power-up your safety committee, contact us to learn more about the Safety Committee Report Card and our focused training options.

GET SOME RECOGNITION!

As an update from the WorkSafe PA Advisory Board, I am happy to report that the State has moved forward on a number of initiatives including improving the web-resources and access for application of the Governor's award in safety & health for PA. If you would like to submit an entry for this program, you can obtain the information at: <http://www.dli.state.pa.us/landi/cwp/view.asp?a=201&Q=68631&landiRNavradC6865=|&landiRNavrad3DFC3=|>.

Check out all of the other resources on this page as well!

UPCOMING TRAINING PROGRAMS presented by HSCSL:

See our training page for more details on the following programs: <http://www.highsafety.com/hsl/resources/courses/>
Our 2005 schedule is coming soon, so check this link often.

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 to register.

Topics in Safety Management (December 2-3, 2004) This two-day program is designed for the safety manager with at least five years experience in the safety field. Call us at (717) 209-4045 or visit our website <http://www.highsafety.com/hsl/resources/courses/> to register.

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

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