

# SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



September - 2003

## NEW PERSONAL PROTECTIVE EQUIPMENT (PPE) STANDARDS

ANSI updated Z87.1 for protective eyewear. This is the standard to which all eye safety equipment must be constructed. The standard has now created two impact hazard categories: Low impact hazard and high impact hazard eyewear. High impact lenses will be marked with an additional "+" on the lens along with the manufacturers' initial. The concept here is that companies can decide to offer high-impact protection for certain jobs, while others only require low-impact.

My thoughts on the new approach: This dual standard only serves to complicate what should be a simple issue. If you offer two types of protection in your work environment, now you will have to ensure that the proper glasses are being worn for the proper task. Transfers to new jobs, borrowing a pair of safety glasses, or simply getting a replacement lens all become more complicated. Employers might best specify which lens will be used in the facility and stick with it – to avoid additional headaches and tracking. If exceptions are made, they should be clearly defined by trade group or department. If you chose the basic protection lens and a department supervisor rents a new piece of equipment with high-impact hazards without switching to high-impact lenses, your program is flawed. The best bet might be: Go high-impact lenses everywhere for ease of administration!

OSHA is also in the process of evaluating the requirements for PPE. OSHA will likely codify the requirement for employers to pay for PPE. While this requirement exists already in a letter of interpretation, it does not show up as a regulation. This could also be fought by business groups, even though it is already stated policy for the agency.

In the respirator world, OSHA is looking at adding a donning and doffing of the respirator as a part of the fit-test process to assure that the wearer is competent in this aspect. In addition, assigned protection factors may be updated in the 1910.134 standard to match up with substance specific protection factors found in other standards.

For those in general industry, OSHA requires a PPE survey to be performed in the facility to determine what types of PPE need to be used for the various tasks. This survey must be certified in writing by the employer. OSHA recommends repeating this survey every five years. While you may not wish to re-do your whole assessment, it is important to update the assessment with changes in operations and expansions.

## MOLD TIPS

Mr. Wittman of HSCSL has been very busy as the school season approached. Facilities opened their doors to find "mold"! Curt is anxious to help resolve these problems for our clients. The best option is prevention. Here's some basic guidance: 1) If water has entered the facility, clean it up quickly. Mold rarely takes hold within the 24-48 hrs following a release. 2) Don't shut down HVAC systems completely while facilities are unoccupied. A certain level of conditioning is needed to control moisture. 3) Remove porous materials that serve as food sources for mold when possible and replace with non-porous materials. 4) Resolve water infiltration problems or the problem will return.

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“Take a pragmatic approach to mold contamination”, says Curt Wittman of HSCSL. “Some mold species are concerning. Some mold contamination could require extensive remediation planning and control. But, the tendency of most people when dealing with something they don’t fully understand is to “do more to be sure” -- “cover all aspects of risk to account for the unknown”. This is human nature. As we learn more about a hazard, we become more comfortable with it and more comfortable with reduced controls. Many in the IAQ business have taken this approach. Since they are not familiar with the potential hazards posed, they tend to fill-in with more controls and protective actions. Some of which are expensive and not helpful in controlling the hazard.”

If you have concerns about facility air quality, Curt Wittman, MS, CIH will be happy to answer them.

## **CERTIFIED BY WHOM?**

Often High Safety has the opportunity to provide educational programs for employers of all types. When employees receive a training certificate from HSCSL or other third-party, if that third-party is not the employer of record, then the training document may be considered incomplete by OSHA. OSHA requires that the employer certify most training. So if the training is provided by a third-party, then for certain types of trainings, the employer should also sign the training certification. OSHA requires employer certifications for: Powered Platforms for Building Maintenance (1910.66); Confined Space Training (1910.146); Mechanical Power Press Training (1910.217); Fall Protection (1926.503); Hazwoper (1910.120); Lockout-Tagout (1910.147); Forklift (1910.178). This list does not include all of the standards that require employer certifications – but many of the common ones.

## **WE MOVED!**

We have re-located our offices – well, sort of. Our offices are approximately in the same location as before, but we have a newly renovated area. If you get by the High Industries, Inc. corporate office, stop in to say “Hi!” We are on the second floor. Phone numbers and all contact information is the same. Now we have a place for all our stuff! -- And some room to grow!

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

OSHA 30 Hour General Industry Course at High Industries, Inc. Sept 15 to 19. Perfect if you need a complete education in safety. Great for safety personnel, HR Managers, supervisors. Call for more information or visit [www.highsafety.com](http://www.highsafety.com).

OSHA 10 Hour General Industry Course at High Industries, Inc. Oct 20 to 21. Great for safety committee members, supervisors, everyone! Call for more information on register on-line: [www.highsafety.com](http://www.highsafety.com).

Forklift Classroom Training Course at Lititz Community Center via Lancaster Chamber. 9-19-03 - Morning Session. Call Lancaster Chamber for information at 717-397-3531 or visit their website [www.thechamber.net/cgi-bin/foxweb.dll/commmcale/99calemain?cc=lcci](http://www.thechamber.net/cgi-bin/foxweb.dll/commmcale/99calemain?cc=lcci).

OSHA Construction Instructors Class 500 at High Industries, Inc. offered through the Keystone Occupational Safety and Health Center (KOSH), an OSHA Training Institute. 9-22-03 to 9-25-03. Pre-requisites must be met. Call 800-318-4846 or register: [www.koshcenter.org](http://www.koshcenter.org).

OSHA 311 Fall Arrest Systems at High Industries, Inc. offered through KOSH Oct 6-8. Contact information above.

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.

Stay Safe!