

SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



SEPTEMBER 2006

TOP TEN MISTAKES IN OSHA RECORDKEEPING

I recently participated in a conference wherein the topic of recordkeeping was addressed. As the speaker was presenting I thought about all the OSHA audits I have conducted. In the majority of them OSHA logs were not properly maintained. I thought that our readers might want to know what I find to be the top errors in these logs.

1 – There isn't a log maintained but there should be. Some industries are exempt from recordkeeping, but most need to be doing this activity. If you are not and have questions about it – call us.

2 – The case description is not detailed enough. OSHA wants the injury type, location and source. For instance: Carpal Tunnel Syndrome in the right wrist does not detail why the problem was created. A description of the event should include the location of the injury, the nature of the injury, the source of the injury and how the source caused the injury. A good description would be: Employee lacerated right little finger while handling metal duct without gloves. OSHA allows you to use multiple lines to enter the information. When I evaluate a company, it is very difficult to get worth while information if the log entry is simply "Lacerated finger".

3 – The OSHA summary is being signed by the person that completed the form. The summary report must be signed by the highest ranking official at the site.

4 – The day of the injury is counted as a lost day. The day of the injury is **NOT** counted as a lost-time day. Even if the employee punches in at 8 AM and is injured and goes to the doctor at 8:05 AM and stays home the rest of the day. As long as they return the following day (if permitted by the doctor) it is not lost time. Remember it is what the doctor says regarding "time off" that determines the lost time days, not the actual days lost.

5 – Checking too many columns on the log for the injury type. OSHA intends for you to check the most severe aspect of the case. The severity is listed in order on the form. If you have a death, you check column (G). If you have lost-time you check column (H). If you have restricted or transferred days you check column (I). All other cases are column (J). Do not check more than one column. As you work from left to right, as soon as you hit a column that applies to your case, stop. A case may have lost time and restricted duty – the lost-time column is the column to be checked, not restricted duty.

6 – Not using unique case numbers. (This is column one).

7 – Not capping counts for restricted and lost-time days at 180. OSHA does not require counting beyond this.

8 – Not adding correctly! I often find the Log does not match up to the summary. Make sure that the number of days lost and restricted or transferred and the total case counts match-up to the summary that you are required to post between February and April. If you have changes in lost or restricted days this is required to be updated on the OSHA log, but not on the Summary report. So if you have changes between the February to April time frame

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there could be a explainable disconnect between these two documents. In most of my findings, the addition was simply wrong.

9 – OSHA recordkeeping is different from Workers' Compensation. Just because WC denies a claim, doesn't mean you can remove it from the OSHA log. Just because WC accepts a claim as work-related, doesn't mean it must be on the OSHA log. These are two different systems that align most of the time, but not always.

10 – Don't record everything! OSHA looks at your records to determine your performance during an inspection. What you report under a BLS request or OSHA request may determine if you become part of a site specific targeting program. Over-reporting is ill-advised. Under-reporting is citable. For these reasons, it is important to get it right! Cases that are recordable must be a) work-related; b) a new case and c) meet the recordability criteria specified. For example a preventative inoculation of tetanus is **NOT** recordable. This is considered preventative and not a treatment. If the case didn't involve any other recordability triggers it doesn't go on the log. All doctor-advised lost time or restricted duty is recordable.

HEAR HERE'S THE SCOOP ON HEARING LOSS REQUIREMENTS

Finally, I would like to address the requirements for hearing loss recordability. A hearing loss is recordable if: a) It is work-related which is presumed when noise in the work area exceeds 85 dbA TWA; b) Involves a threshold shift of 10 dBA (averaged over three frequencies 2K,3K,4K); c) Involves a shift from audiometric zero of 25 dBA in these same frequencies. When a shift is reported make sure that you have asked your testing company to apply age correction factors in making this determination. Some testing companies believe that this masks changes and while this is could be true – we are trying to achieve two goals – One is to control hearing loss wherein not applying age correction makes sense. Second we are determining if a case must be recorded. – Age correction should always be applied in this case. If you have a reported shift, you must test again within 30 days – or assume that the shift is valid. If testing within 30 days shows a shift that is not valid, you ignore the first test. If the shift is persistent, it must be recorded on the log and the testing company should re-set the baseline so that future shifts can be identified. If you have one person showing shifts year after year, the testing company may not be re-setting the baseline. If they are – you have someone with serious losses in hearing that are progressing.

IF you are ever unsure of a recordkeeping application, give us a call. There are some gray spots but most applications of the rule are clear. We also can perform a recordkeeping review a very reasonable cost to help assure that your files are in order.

NEW RESPIRATORY PROTECTION RULE IN PLACE

The long awaited assigned protection factors for respiratory protection has been issued by OSHA. This new respiratory protection rule assigns protection factors to specific types of respirators. While this information was generally available previously, there was varying sources and some conflicts in those sources for protection factors. OSHA has now put the specifics into their standard clarifying the rule for employers. A protection factor is amount of protection a respirator offers. A vapor respirator with a protection factor of 10 will allow the device to be used in a Maximum Use Concentration (MUC) equal to 10 x the Permissible Exposure Limit (PEL). As an example the PEL for Ethyl Acetate is set at 400 ppm. A half-mask respirator has a PF of 10; therefore I could be exposed up to 4000 ppm of Ethyl Acetate without violating the standard. The other change is that the chemical specific respirator requirements have changed to be in-line with the new standard. If you have chemical-specific rules that apply to your workplace, it will be important for you to review this [new standard](#) and its impact on your business.

CHROMIUM VI

Did you do your air monitoring yet for Chromium VI? If not, the deadline is approaching to come into compliance with this new rule. If you have electro-plating operations or welding operations (particularly stainless or galvanized) or any other chemical that contains hexavalent chromium you will need to evaluate these exposures OR be able to provide objective data demonstrating that the exposures are below the exposure limit for this chemical (5 ug/m3). This exposure limit is ten times lower than the lead exposure limit by comparison. Some groups argue that this level is too high. You must have your exposure determination and all controls in place by November, 2006 except for engineering controls. If you have less then 20 employees you can wait until May of 2007. We can assist with

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exposure assessments, complete program development, training and everything else you need to be completely in compliance before the deadline.

STAFF MEMBER CERTIFIED

Lisa Krug, BS, CIAQP recently received her certification from the Association of Energy Engineers as a Certified Indoor Air Quality Professional (CIAQP). This certification requires a combination of experience, education and successful testing in order to meet the requirements of the Association's certification requirements. Lisa continues to receive positive feedback from our customers on her style, knowledge and approach to IAQ problems. If you are dealing with an Indoor Air Quality issue, we can help you solve it.

NEW FACE IN THE PLACE (AGAIN)

I'm happy to announce that High Safety is expanding once again! Last month I mentioned the addition of Dominick DiMichael, MS, CIH, ARM. In October, Christopher Bittner will join our group as a Safety & Health Technician. Chris has over 16 years of experience in emergency response and construction safety. Previously, Chris worked as a technician and operations coordinator for an emergency response spill group. He was also employed by the US Coast Guard where he conducted pollution investigations, responded to spill events and conducted various safety related functions. Chris is enrolled in a Fire Science degree program.

OTHER UPCOMMING PROGRAMS OFFERED BY HSCSL

OSHA 30 Hour Class for General Industry. If you are new to the safety and health field, if you want to brush up on the OSHA rules, or if you are responsible as a manager or supervisor to assure safety in your work-group, this course is for you. There is a lot of misinformation available from reputable sources on OSHA compliance – WE don't have ALL the answers – But I am continued to be amazed at the number of "OSHA instructors" that don't really understand what they are teaching! – No offense if you happen to be one! – I am sure that you read the rules closely and provide reasoned opinions with back-up via letters of interpretation...etc. Click on the link to learn more about this program or call for our brochure. TIME IS RUNNING OUT – so don't walk – run to the phone – (Wait... is that safe?). Can't take a whole week of safety training??? Try the OSHA 10-Hour. I believe the 30-hour is easier to complete – The 30-hour course has more activities, resulting in more engagement of the participant (but it is 20 hours longer).

HAZWOPER Update. OSHA requires that those individuals involved in "emergency" response in a workplace in which chemicals are involved be trained under the Hazwoper rules. This full-day program is an update (required annually) for those folks who are called upon to respond to chemical spills at their workplace.

[To see our complete list of courses offered at our facility see our website.](#)

**REGISTER FOR THESE AND OTHER PROGRAM ON OUR WEBSITE
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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