

# SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



**DECEMBER, 2008**

## **TALKING TURKEY**

How much did your Thanksgiving Turkey weigh? These things can be rather large and heavy. Hopefully your Thanksgiving was less eventful than this woman's! Check out the challenge faced with this oversized bird: <http://www.youtube.com/watch?v=c0OZvjeMiUM>

Thanksgiving this year has meant more than Tom the Turkey getting the cut....many workers are finding that their organizations are struggling for capital or for work. As a result many are also finding the ominous "pink slip" (is there really such a thing anymore?) landing on their desks. I have had calls from several experienced safety professionals now looking for opportunities for employment. This is not a pleasant time for employers or employees as financial realities require tightening of the belt by both the consumer and organizations.

It is often said that Safety positions are often the first to be cut. To the extent this is true, I don't know, but I do believe some safety positions are viewed as expendable....and perhaps they are. How job-proof is your position? While there may be little you can do when an organization makes a decision to re-organize or lay-off, but here are a few suggestions that might help...

### **NUMBER: 1 SHOW 'EM THE MONEY**

Has the organization seen the benefits that have been created by the processes and procedures that have been put in place for safety? This is a real challenge for the safety professional. He/She must somehow determine the value their role has contributed to the organization. Of course we know that no safety position can do it alone...and it is really everyone else that achieves superior safety performance.

But the safety manager should have been the leader in developing the processes to achieve improvements and (s)he needs to toot the horn a bit! The hard part is defining the internal rate of return or improved cash flow because of the safety and health program aspects. This can be done – particularly if the organization has previously experienced a loss-run from specific exposures in the past that have been controlled. When loss experience data isn't available, external statistical resources can be used to compare organizational performance to the "norm". Data from the Bureau of Labor Statistics, National Safety Council and other sources can help to define likely losses prevented. Evaluating the insurance cost and the organization's experience modification rating (EMR) against the "norm" can also help to define the loss exposures which are normal and then comparing these to the organization's.

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Management should be keenly aware of the impact that safety has provided to the organization and it is the safety manager's job to provide this education. If it turns out that the organization isn't performing well, then you might suggest that it is even more important to have a focus in this area. Projecting potential savings that the organization could experience with continued focus and efforts might help management to buy-in to the vision of reduced risk costs. The safety function needs to communicate to the organization as to the role and value that safety brings to the company. Have you provided year-end annual reports to top management explaining the organization's performance, current issues and vision for the future? This report should include appropriate metrics for organizational performance. You need to be familiar with the business metrics within the organization and relate safety aspects to these metrics.

## **NUMBER 2 DEVELOPMENT**

If you've been in your role for awhile, have you taken the time to develop your knowledge so that you always have something new to offer? If you've not branched out and tried to expand your capabilities and knowledge, you are doing yourself and your employer a disservice. There are two bodies of information that you need to follow. First, the business trends...if your organization is doing lean, six-sigma, or ISO 9001 ask to participate in the training. If the company initiates a new system, process or procedure...get involved. By understanding these systems, you can integrate safety into the business systems and make safety and your role more valuable. Understand what makes the business work and make every effort to make safety work for the business. Second is the technical field of safety. There is continually new research and new methods being added to a very large body of information. There is no possible way to absorb all if it...but continue to seek opportunities to expand what you know. Recently, my son who is in 5<sup>th</sup> grade was doing leaf-and-steam plots. I have never heard of this plotting method.

As I was reading my textbook in statistics, I read that these were created in 1977...My 5<sup>th</sup> grade education was lacking because time moved on. By developing yourself, you will also help assure that if you do find yourself seeking employment that your credentials will be able to compete with others. There is new information and old information that I can assure you that you haven't seen yet or have long forgotten!

Seek to develop yourself by assessing your strengths and weaknesses. I recently took an on-line test called Strengths Finder 2.0. You can buy the book at Borders which includes an access code. Or you can purchase an access code here: <http://www.strengthstest.com/index.php> The authors of this text suggest that individuals should focus on their strengths rather than spending a lot of time trying to do things that they don't do well. The concept of "If you try hard enough, you can do it" goes out the window and in its place is the idea that you might be able to do it, but you probably won't be good at it. The authors suggest greater leverage and success comes when we focus on our strengths, rather than our weaknesses. Look for opportunities to add your strengths to the organization which might go beyond the traditional lines of a safety and health professional.

## **NUMBER 3 WHAT CAN YOU DO THAT NO ONE ELSE CAN DO?**

As a business-owner I ask this question of my consulting group. This answer serves as our point of differentiation that sets us apart. How do you differentiate yourself in your organization? What do you bring that others cannot? Seek to make yourself invaluable through skills, knowledge and commitment. Finally, very simply...Check your work ethic. If you arrive 20 minutes late everyday and are closing your car door at 5:01 PM...consider that this might indicate that you don't have enough to do...and perhaps aren't committed as the organization would like. None-the-less, new directions and severe economic times can cause organizations to make tough decisions which affect good people. For those organizations in markets less affected by these economic times...it might be a good time to add safety professionals to the staff.

## PROPOSED CRANE STANDARD CONTINUES MOVING

OSHA extended the comment period for the new proposed crane standard in construction. Comments are now due by January 22, 2009. The new requirements involve 250 pages of content. Major sections in the proposed standard include certification of crane operators. This will be in place in PA anyway by 2010 with the newly passed crane licensing act. The proposed standard includes major sections on assembly and dismantling of cranes; detailed requirements on near proximity electrical work (which required de-energization and grounding); equipment design aspects (for example cranes over 6000 lbs. capacity will need to have a load moment indicator or load weight indicator). The standard also includes more specific information on procedures and precautions to be followed for tower cranes, derricks and barrage cranes.

Overall the standard is a good one. It will add some cost and could require some equipment to be retrofitted, although most of the equipment specific requirements have grandfather dates. The standard generally codifies good operating practices that should be followed anyway. The only downside is that the definition of a crane is rather broad. So if an employee decides to use an overhead bridge crane to move an item, he/she will need to be certified. (Perhaps a little much to move a load of pallets with a bridge crane during a construction project.)

## NEW GUIDELINES FOR OSHA INSTRUCTORS

For any of you who are OSHA instructors out there – OSHA has issued new guidelines for trainers. These are posted at: [http://www.osha.gov/dte/outreach/construction\\_generalindustry/guidelines.html](http://www.osha.gov/dte/outreach/construction_generalindustry/guidelines.html)

OSHA adjusted the topics that will be taught to specify which topics must be covered. There are some new recordkeeping requirements. Instructors must keep records for 5 years including daily sign-in sheets, student addresses, copy of card request documentation and card numbers issued to students. Certification for training conducted in accordance with the requirements is required for all classes. You must do updates every four years to remain a trainer. We are running a OSHA 503 General Industry Instructor Update in January, 2009. We also have an OSHA 500 Instructor-Trainer Program to run in February, 2009. Register for these programs through the Mid-Atlantic OSHA Training Center <http://www.oshamidatlantic.org/> Note the pre-requisite requirements for these programs.

## MRSA AND RELATED HEALTHCARE SAFETY INFORMATION

OSHA's Hospital eTool features a new resource to help avoid occupational illness. The new [Methicillin-resistant Staphylococcus aureus \(MRSA\) module](#) provides links to general information, offers answers to frequently asked questions, and identifies sources for a variety of workplace settings on how to prevent the spread of infection. OSHA's [eTools](#) are stand-alone, Web-based training tools on occupational safety and health topics. NIOSH has also recently released information on precautions to follow with the handling of drugs which could be dangerous to healthcare workers. This is available at: [www.cdc.gov/niosh/docs/wp-solutions/2009-106](http://www.cdc.gov/niosh/docs/wp-solutions/2009-106).

## A NOTE ON NOISE

OSHA mandates that employers not expose worker to noise which exceeds the Action Limit (AL) of 85 decibels on a time-weighted-average (TWA). If your workplace is very quiet, there is really no need to check the noise levels. If you have some noise, you need to determine if there is a potential that individuals are being exposed to levels above the AL. Once above the AL,

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you need to institute a written hearing conservation program, testing exposed employees' hearing annually, conduct training annually, post the OSHA standard, record changes in hearing which meet recordability requirements and institute engineering and administration controls to reduce the noise levels. When the workplace changes such that more people could be exposed or such that noise levels could increase, re-monitoring is mandated. In general practice, it is good to monitor noise exposure every few years and not less than every five years if you have a very static work environment. If you are concerned about noise in your workplace, we can assist in providing noise surveys and addressing all of the compliance requirements under the standard. In most cases, doing simple sound level meter surveys will not provide a good understanding of the time-weighted-average exposures. If you have workers who stand in the same position all day and who do the same thing all day and a sound level meter is consistently showing levels below 85 dBA, dosimetry is probably not necessary...But this scenario does not apply to many workplaces.

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