

# SAFETY / OSHA UPDATE

A Newsletter from High Safety Consulting Services, Ltd.

Information on Safety & Health in Your Workplace



## INTO THE NEW YEAR

Thank you to all of our clients and friends that made 2004 a successful year for High Safety. In the past year we added additional consulting resources and in 2005, we will be adding additional hygiene equipment so that we can better serve our customers with faster response and even better diagnostic tools. We also believe that continued business growth will allow our group to further expand our operation. The start of a new year is a good time to re-assess your safety and health goals for the next year. It's also time to POST your OSHA 300A Summary. This document must be posted from February 1 to April 30. If you need help, give us a call. Note that the summary form MUST be signed by the highest official at the facility in which it is posted.

## ARE SAFETY COMMITTEES EFFECTIVE?

Most safety and health professionals would likely respond positively to this inquiry and will cite personal experiences which would support their position. While empirical information is helpful and worth considering, what do the data tell us? ("data" is a plural word – so...no I didn't make a grammatical error). I believe that a safety committee can be very effective and many are -- some are not. The PA Compensation Rating Bureau has summarized some information regarding the PA Certified Safety Committee Program. This report covers the years 1994 through 2001. It is interesting to note that companies with participating certified committees have HIGHER total incident rates for BOTH indemnity (loss-time) and total claims! The only element that was notably better with certified safety committee companies was the fact that their average claim cost was about \$1000 lower than those without a committee. But with a claim rate of 14 times that of the non-certified safety committee company, this lower claim dollar value doesn't translate into lower costs. So what's going on? Should we abandon safety committees?

I suspect that those companies most affected by workers' compensation expenses saw the most value in the 5% discount. This presumption is supported by the fact that those companies with safety committees had much higher policy values. So unless we can compare performance of these specific companies pre and post committee certification, we really don't have good understanding of the change. Since the companies with safety committees also had larger policy values, it may stand to reason that they are larger companies, and therefore have more advanced claim-management practices, which could explain a lower cost-per-claim. How's your safety committee progressing? Our Safety Report Card can provide valuable insights into Committee strengths and weaknesses as well as serve as a benchmark for the future.

## CONSTRUCTION EQUIPMENT FALL PROTECTION

A recent OSHA 30-Hour course participant inquired as to the requirement for fall protection on mobile equipment. In construction the requirement for fall protection kicks in for most activities at 6 feet. The standard specifically addresses this requirement on walking and working surfaces. Walking and working surfaces are defined to specifically EXCLUDE "ladders, vehicles, or trailers on which employees must be located in order to perform their job duties." So, Subpart M – Fall Protection does NOT apply to mobile equipment in construction. This same statement is not true however for general industry exposures. A 10-18-1996 letter from OSHA addresses tank and hopper cars. The letter indicates that these exposures could be cited for failure to provide fall protection under

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OSHA's General Duty Clause, if a method to provide fall protection is feasible (i.e., the equipment is positioned inside of a facility which would facilitate the installation of a fall protection system). Of course, many of you know my line..."If it's over six feet, we should be providing some type of protection in most cases, even when OSHA doesn't require it."

## CLEARING THE AIR

EPA has stated that indoor air quality is often five times worse than outdoor air. Since we spend much of our lives inside – in fact, if you consider the amount of time you spend outside, it might surprise you. Today for instance I will spend only about five minutes outside – otherwise I will be in my office, car or house! With the focus on indoor air quality increasing, many new air-cleaning products have entered the market. Some of these will improve the air quality; others will have little impact and some could actually create an air quality problem! So which air cleaner is the best? There are many different approaches to 'clearing the air', let's look at several of them.

**FILTRATION** – Filtering the air can be an effective way to clean the air. Air filters use a fan to push air through a filter system. The better the filter -- the better the result. Air cleaning filters should be High Efficiency Particulate Air Filters (HEPA). The efficiency of a HEPA filter is nearly 100% (99.97%). These filters remove particles from the air (dusts) but they cannot remove gases or vapors from the air. Generally, a HEPA filter will not correct an odor problem. They may help reduce problems associated with asthma or other airway responses to particulates.

**VAPOR CONTROL** – Controlling vapors or gases requires a filtration method other than a mechanical capture of the particles. Because vapors and gases are very small, activated charcoal is often used via adsorption to remove gases or vapors. If you are selecting an air filter to control gas or vapor odors, a system with activated charcoal may help depending on the vapor you are trying to control. These filters need to be changed out and the frequency of change-out is dependent on charcoal amounts, vapor loading along with several other factors...so knowing when to change the filter can be tricky. These filters are not inexpensive. Of course the best way to control an odor issue is to address the source.

**ELECTRO-STATIC** – Electrostatic precipitators use high voltage to 'zap' particulates. They work similar to a bug zapper, only with small particles rather than insects. The particles are essentially "burned-up" by the electric zap. These cleaners have the advantage of not requiring expensive filter change-outs. They also have the limitation of a filter system, in that they will not remove vapors or gases.

**NEGATIVE ION GENERATORS** – These devices use negative ions to cause particles to be charged and as a result the particles move out of the air and onto a collector plate or in some cases, cling to your walls...creating cleaner air - but dirty walls. While these devices work at some level they also introduce ozone into the air. Ozone is chemically represented as O<sub>3</sub>. Because oxygen is normally diatomic (O<sub>2</sub>), this third atom is reactive and seeks to bond with something to move back to its stable state (O<sub>2</sub>). This can cause damage to your lung tissue...Ozone has an exposure limit which is based on the rate of respiration, which is a function of the metabolic load on the body. The exposure limits range from 0.2 ppm to 0.05 ppm (ACGIH-2003). By comparison, the limit for cancer-causing benzene is ten times higher! For more information on the hazards of these devices, see: <http://www.dhs.ca.gov/ps/dcdc/cm/pdf/cm9803pp.pdf> Note: This is an Adobe (.pdf) file with California-specific information.

Filters must be properly sized for the environment in which they are attempting to clean. Consider the cubic footage of the room you wish to clean. Most air cleaners will have a cubic foot per minute (cfm) rating. Consider the number of minutes required for the air in the space to be filtered. The higher the exchange rate the better the air cleaner. You will want to shoot for about 2 to 4 air exchanges per hour as a minimum level. Higher exchange rates may be needed when contaminants are being generated in the area. For more information on selecting an air filtering device see the American Lung Association's site: <http://www.lungusa.org/site/pp.asp?c=dvLUK9O0E&b=39310>. This site provides a good overview of considerations for air cleaning systems.

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## TRAINING REQUIREMENTS

OSHA has really only a few annual training mandates. More often, OSHA requires training initially and when there is a change in a hazard or responsibilities as they relate to safety. Sometimes OSHA requires a review of an individual's performance to determine if training is needed (forklift, lockout-tagout). Here's a summary of some of the most common OSHA training requirements which may help you plan your training. In all cases, training should be repeated as needed to retain proficiency. This is a summary and does not include all training requirements. Specific details of the training requirements are specified in the appropriate standard. If you need help understanding your requirements, let us know. Also, this information applies to organizations regulated by Federal OSHA (Pennsylvania – private and federal employers). If you are in an OSHA-Plan State, your requirements may be more stringent and rules will apply to state employers as well.

| Item                                   | Basic Requirement  |
|--|--|
| Blood borne Disease                    | Annual for General Industry Employees Exposed to Blood / Body Fluids as part of their job. Includes coverage for first air responders.   |
| First Aid                              | As required by the certification cards (American Red Cross – 3 yrs / American Heart 2 – Yrs).  |
| Fire Extinguishers                     | Annual, if employees are expected to use them.   |
| Fire Plan                              | Upon hire and when responsibilities change or plan changes.  |
| Forklift                               | Initially, Post Near Miss, Post Accident, New Hazard or New Equipment, When observation (required after training and at least every 3 years) identifies a deficiency.                |
| Lockout / Tagout                       | Initially, When Energy Control Procedures Change, When employee is transferred to new area, When annual inspection identifies deficiency, When deviations from procedures are noted. |
| Confined Space                         | Initially, change in duties, deviations from policy are noted.   |
| Confined Space Rescue Team             | Annual practice required for General Industry.   |
| Noise Exposure                         | Annually when exposure > >= 85 dBA TWA for General Industry  |
| Lead Exposure                          | Annually when covered by lead program.   |
| Access to Medical and Exposure Records | Annual Notification required.  |
| Fall Protection User                   | Initially, When deviations / deficiencies are noted, When there are changes in the workplace. Not specified for general industry.  |
| Scaffolding User                       | Initially, When deviations / deficiencies are noted, When there are changes in scaffold types, fall protection, new hazard. Not specified for General Industry.                      |
| Hazard Communication                   | Initially, When new chemical hazards are introduced.   |
| Right-to-Know                          | Annually – If you are NOT regulated by the hazard communication standard (school systems), you are regulated by the state R-2-K rule. When chemical hazards change.                  |

## 2005 COURSE SCHEDULE

Our 2005 course schedule has been mailed out. If you didn't get a printed version of the courses available, see our website at: <http://www.highsafety.com/hsl/resources/courses/>. If you want a printed course schedule, let us know and we'll get one out to you. (We had to narrow our database to 5000 individuals to receive this publication.) Sign up now for the Accident Investigation course on 2-18-05. This ½ day program will review techniques and methods of effective accident investigations presented by Rhonda Kurtz of High Industries, Inc. Do you know some supervisors that could use a refresher? This is one of the most common weaknesses that I find in facility safety reviews. Sign up by clicking the link above.

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



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