

Your Company Safety Plan

Jim Brewer
Magic Sweep Corporation

This session will discuss the required parts of a Company Safety Plan and why it is important. We will also discuss how an employee fatality effects your business and dealing with OSHA investigations. Topics covered include: Job Hazard Analysis, Recordkeeping & Reporting, Personal Protective Equipment, Respirator Program, Hazard Communication, Driver Safety, Silica Exposure, Confined Spaces, Scaffolding, Fall Protection, Ladders, Aerial Work Platforms, Forklifts, Lockout/Tagout, and the OSHA General Duty Clause.

2019 HPBExpo Education
Sponsored by:





By Jim Brewer

YOUR COMPANY SAFETY PLAN

WHY I'M DOING THIS

- ✘ Started my business as a part-time thing in 1978 while working as a Firefighter/Medic so I have a long background in safety
- ✘ Still currently a Paramedic in Virginia Beach
- ✘ Member of NCSG OSHA Task Force for approximately 10 years
- ✘ Well developed company safety plan
- ✘ And things still go wrong

APRIL 6, 2016

- ✘ My day started at Chesapeake General Hospital for a medical procedure that wasn't much fun
- ✘ I remember thinking as I left there around 9:15 my day would surely get better
- ✘ I had no idea I would be back there that afternoon because one of my employees had died while working for my company

BILL

- ✘ Bill was a great guy, everyone enjoyed having him around
- ✘ Bill worked for us part-time, his full-time job was a Lieutenant for the Chesapeake Fire Department
- ✘ Bill had two children



WHAT HAPPENED

- ✘ There were no witnesses but the OSHA investigation and the Work Comp investigation seem to agree the cause was a ladder kickout
- ✘ One-story house, 8 ft 9 inches to roof edge
- ✘ Cause of Death was Head Trauma

ACCIDENT REPORTING

- ✘ All employers are required to notify OSHA when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.
- ✘ A fatality must be reported within 8 hours.
- ✘ One in-patient hospitalization for treatment, amputation, or eye loss must be reported within 24 hours.

REPORTING NOT REQUIRED

- ✘ Emergency Room treatment
- ✘ Doc in the Box centers
- ✘ Injury or death as a result of motor vehicle accident on public street/highway

YOU NEED HELP

- ✘ I called my wife
- ✘ I called Clay Lamb
- ✘ I called my attorney, who connected me with an attorney who specialized in OSHA matters

- ✘ Clay's advice to me was "You need an attorney to speak (and think) for you because you won't be making good decisions"

REPORT THE ACCIDENT

- ✘ I reported the accident within the required 8 hour window, approximately 10 pm
- ✘ Investigator answered the phone, and took down basic info and said he would be in touch in the morning

THE INVESTIGATION

- ✘ Have your attorney present
- ✘ Investigator will ask for all pertinent documents
 - OSHA 300 logs, previous accident reports, training records, Safety Program, respirator program, HazComm, safety meeting minutes
- ✘ Investigator will survey your business location and equipment
- ✘ Investigator will/may interview employees

ACCIDENT SITE INVESTIGATION

- ✘ Investigator will visit accident site and interview any witnesses
- ✘ Investigator will review any other investigator reports and medical examiner report

CITATION

- ✘ We did not get the results of the investigation or a citation for over 90 days
- ✘ Initial fine was for \$22,665
 - + No hard hats
 - + Fall Protection
 - + Ladder on slippery surface

- ✘ Our initial fine would have been about 40K under new fine schedule

OSHA FINE INCREASE

- ✘ OSHA's maximum penalties, which had not increased since 1990, went up 78 percent on August 1, 2016.
- ✘ The top penalty for serious violations rose from \$7,000 to \$12,471.
- ✘ The maximum penalty for willful or repeated violations increased from \$70,000 to \$124,709.

AVOID WILLFUL & REPEAT VIOLATIONS

- ✘ *“Manuel Gallardo, owner of Gallardo's Construction Services, was cited after OSHA inspectors observed employees exposed to fall hazards on six Chicago-area residential roofing projects between August and November 2017. Gallardo was cited for four willful and three repeated violations for failing to: install fall protection systems, ensure the use of protective devices, and train workers in fall protection hazards. OSHA proposed penalties of \$281,286.”*

Safety Resource Associates, LLC

INFORMAL CONFERENCE

- ✘ Request an Informal Conference
- ✘ Present your abatement plan
 - + Climbing helmets
 - + More rope & harness training
 - + Ladder Clamps
 - + Refresher training on ladder – specific warning about decks

OUTCOME OF INFORMAL CONFERENCE

- ✘ Fall Protection penalty eliminated
- ✘ Hard hat penalty reduced to \$504
- ✘ Ladder penalty reduced to \$3500
- ✘ Net result \$4004 due within 30 days, which we paid

ACCIDENTS & INVESTIGATIONS – MORE INFO

- ✘ OSHA 3000 – Employer Rights following an Investigation
- ✘ OSHA 2098 – OSHA Inspections

POLICE INVESTIGATION

- ✘ There was also a police investigation but no charges as a result of that investigation
- ✘ Probably a formality to insure the death was actually accidental and not a result of foul play

WORKER'S COMPENSATION

- ✘ WC performed an investigation
- ✘ Settlement reached with family

WORKER'S COMP RATING

- ✘ Each year your WC insurance company reviews your claim history and assigns you a new WC "mod" (sometimes called EMR for Experience Modification Rating) based on your claim experience for the last three years
- ✘ The mod is a direct multiplier of the stated premium for your classification
- ✘ Our mod increased from .92 To 1.5

ARAP

- ✘ All Risk Adjustment Program is an additional rating based on experience but only applies to companies forced to get WC coverage in the assigned risk pool
- ✘ Our ARAP increased from 1.0 To 1.23
- ✘ Fortunately our insurance company renewed our coverage, so this factor did not apply to us

INSURANCE COVERAGE

- ✘ Our WC premium increased, other policies did not
- ✘ We have been insured with Nationwide (same agent) since 1983 and they did not cancel, and even renewed all policies including WC in the following year
- ✘ Benefit of long history and low claims

OTHER CONSIDERATIONS

- ✘ Tremendous feeling of guilt and helplessness
- ✘ Considerable stress dealing with lawyers, OSHA, Worker's Comp, family
- ✘ Employee uncertainly – Is this job/company safe for me? Will this company survive this tragedy?

DOCUMENTATION

- ✘ The OSHA investigator will want to see all of your training records.
- ✘ Make sure you keep written records of all training activity
- ✘ If it isn't written, it didn't happen

MOVING FORWARD

- ✘ If it can happen in my company it can happen in your company
- ✘ Have you done everything you can to provide a safe work environment for your employees?

LET'S GET PROACTIVE

- ✘ Let's spend the remainder of this seminar focusing on accident prevention
- ✘ I will talk a lot about OSHA requirements because that is how you will be judged should an accident occur
- ✘ The ultimate goal, however, is accident prevention and not having to make the call to OSHA

JOB HAZARD ANALYSIS

- ✘ This is a process of examining your work site and work processes to identify potential hazards
- ✘ Involve your employees
- ✘ Define the hazards, and then work toward developing procedures to minimize or eliminate the risk

JOB HAZARD ANALYSIS

- ✘ A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.

GOAL OF JOB HAZARD ANALYSIS

- ✘ The goal of the JHA is to identify hazards before they occur
- ✘ Take steps to prevent accidents

CONDUCTING A JHA

- ✘ Involve your employees – They have the most at stake, and they know the jobs and tasks
- ✘ Review your accident history – Great indicator of areas that need attention (OSHA 300 logs)
- ✘ Job review – Discuss w/ employees the known hazards in workplace and job sites.

CONDUCTING A JHA

- ✘ List the hazards and rank them in order of priority for resolution
- ✘ Brainstorm solutions to reduce or eliminate the hazard.
- ✘ Develop guidelines and policies
- ✘ Document the new procedures
- ✘ Train the employees

PRIORITIES OF MAGIC SWEEP JHA

- ✘ Roofs
- ✘ Ladders
- ✘ Jobsite
- ✘ Chemicals
- ✘ Driving
- ✘ Tools
- ✘ Animals/Insects
- ✘ Weather
- ✘ Equipment
- ✘ Substance Abuse
- ✘ Lifting / Body Mechanics

MORE INFO ON JHA

- ✘ OSHA Publication 3071
- ✘ Lots of info on the web if you Google “Job Hazard Analysis”

OSHA 300 & 300A

- ✘ If you had 11 or more employees any time during the previous year, you are required to prepare an annual OSHA 300 Illness & Injury Report
- ✘ Post the OSHA 300A Summary from February 1 to April 30 each year
- ✘ Do not post the 300 because it contains names & details

OSHA 301

- ✘ This is the actual incident report with details of the event and personal info
- ✘ Do Not Post because it contains personal information

RESOURCES FOR RECORD KEEPING

- ✘ OSHA 3744 - Recordkeeping Factsheet
- ✘ OSHA 3745 - Reporting Requirements
- ✘ OSHA 3746 - Who Keeps Records

NEW – ELECTRONIC FILING REQUIRED

- ✘ Effective 7/1/18, employers in most business categories (including chimney service) that have 20 or employees must submit their 300A Annual Summaries electronically
- ✘ All employers with 250 or more employees must submit 300 Log, 301 Accident Reports and 300A Annual Summary
- ✘ Some state plans have delayed implementation

OSHA TOP 10 VIOLATIONS IN 2017

- ✘ **Fall Protection - General Requirements** (1926.501): 6,072
- ✘ Hazard Communication (1910.1200): 4,176
- ✘ **Scaffolding** (1926.451): 3,288
- ✘ **Respiratory Protection** (1910.134): 3,097
- ✘ Lockout/Tagout (1910.147): 2,877
- ✘ **Ladders** (1926.1053): 2,241
- ✘ Powered Industrial Trucks (1910.178): 2,162
- ✘ Machine Guarding (1910.212): 1,933
- ✘ **Fall Protection - Training Requirements**: 1,523
- ✘ Electrical - Wiring Methods (1910.305): 1,405

OSHA 10 & 30 TRAINING

- ✘ OSHA has standardized industry training courses called the OSHA 10 (hour) and OSHA 30 (hour)
- ✘ OSHA 10 is for employees/workers
- ✘ OSHA 30 is for supervisors
- ✘ Both available online and locally
- ✘ Both approved for CSIA / NFI credits

FIRST AID TRAINING & SUPPLIES/KITS

- ✘ Generally required under the OSHA regs
- ✘ Available from many local sources
- ✘ *“In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.”*
- ✘ OSHA has suggested 3 to 4 minutes as “near proximity”

PPE / PERSONAL PROTECTIVE EQUIPMENT

- ✘ Equipment worn to minimize exposure to hazards that cause serious workplace injuries and illnesses.
- ✘ Needs dependant on the hazards.
- ✘ Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests and full body suits.
- ✘ Employer required to furnish PPE

PPE TRAINING

- ✘ Employer must provide training:
 - + When PPE is necessary
 - + What type of PPE is necessary
 - + How to put on, take off, adjust & wear
 - + Limitations of PPE
 - + Proper care & maintenance, when to retire
- ✘ More info – OSHA 3151 booklet

COMMON PPE



FACE SHIELDS

- ✘ Excellent protection when using power tools, especially grinders



Uvex Bionic Face Shield with Clear Polycarbonate Visor (S8500) (Amazon for \$22.57)

CLIMBING HELMETS

- ✘ Climbing helmets are recommended for all roof work
- ✘ These helmets are tested to the same Z89.1 standard as "standard" hard hats
- ✘ Vented helmets offer no electrical protection (Class C)



RESPIRATOR PROGRAM

- ✘ OSHA 1910.134 requires a Respirator Program if employees are required to use respirators
 - + Selection of respirators
 - + Medical questionnaire / evaluation
 - + Fit testing
 - + Training on use, maintenance, recognition of hazards & problems

RESPIRATOR RESOURCES

- + OSHA 3079 booklet
- + OSHA 3384 Small Entity Guide for Respiratory Protection Standard

SAFETY BAG

- ✘ All techs and helpers have a Safety Bag, which is issued on their first day at work
- ✘ It is a backpack with all of their PPE gear in it
- ✘ Backpack makes it easy to keep up with and move from truck to truck
- ✘ Respirator
- ✘ Eye Protection
- ✘ Climbing Helmet
- ✘ Gloves
- ✘ Hearing Protection
- ✘ Safety Vest
- ✘ Eye Wash Solution
- ✘ Band-aids
- ✘ Portable GFCI Outlet

HAZ COMM

- ✘ Haz Comm, or Hazard Communication Standard, states “All employers with hazardous chemicals in their workplaces must prepare and implement a written hazard communication program, and must ensure that all containers are labeled, employees are provided access to MSDSs, and an effective training program is conducted for all potentially exposed employees.”

HIGHLIGHTS OF HAZ COMM POLICY

- ✘ Conduct a chemical inventory
- ✘ Ensure all chemicals are labeled
- ✘ Obtain SDS for all chemicals
- ✘ Ensure employees have access to SDS
- ✘ Train employees on reading SDS and understanding/recognizing chemical hazards
- ✘ Provide & train for required PPE

HAZ COM – MORE INFO

- ✘ OSHA 3696 – Haz Com Fact Sheet
- ✘ OSHA 3084 – Chemical Hazard Communication
- ✘ OSHA 3111 – Hazard Communication Guidelines
- ✘ OSHA 3493 - Safety Data Sheet QuickCard
- ✘ OSHA 3492 - HazCom Label QuickCard

DRIVING SAFETY & TRAINING

- ✘ The leading cause of worker injury and death is motor vehicle accidents
- ✘ Each year accounts for 30 – 40% of worker fatalities
- ✘ Think about your responsibility when you place (primarily) *young guys in big trucks*

DRIVER SAFETY PROGRAM

- ✘ Prevent injury & death within your workforce
- ✘ Protect company human and financial resources
- ✘ Guard against potential liability

THINGS TO CONSIDER

- ✘ Seat belt use
- ✘ Secure materials and ladders
- ✘ Distracted driving (*cell phones, calling clients*)
- ✘ Fatigued driving (*busy season, too many jobs*)
- ✘ Aggressive driving
- ✘ Young drivers
- ✘ *Are your company policies encouraging unsafe driving habits ?????*

RESOURCES

- ✘ Guidelines for Employers to Reduce Motor Vehicle Crashes handout
- ✘ OSHA 3416 – Distracted Driving Flyer
- ✘ Your vehicle insurance carrier
- ✘ AAA local office probably provides training, which probably qualifies for CEU's

SILICA

- ✘ *New rules effective September 23, 2017*
- ✘ Exposure to respirable crystalline silica can cause silicosis, lung cancer, respiratory illnesses and kidney disease
- ✘ Silica found in sand, concrete, brick, block, stone and mortar
- ✘ Exposure occurs during tasks such as grinding, drilling, using masonry saws, mixing mortar

CONTROL OF SILICA HAZARDS

- ✘ Written plan required & medical exams
- ✘ Provide respirators & training

- ✘ Wet sawing
- ✘ Dustless collection for tools such as drills and grinders
- ✘ Respirators meeting minimum APF (Assigned Protection Factor) required for some tasks

STATIONARY MASONRY SAWS

- ✘ Use saw equipped with integrated water delivery system that continuously feeds water to the blade
- ✘ Operate & maintain according to manufacture
- ✘ No respiratory protection required

HANDHELD POWER SAWS (ANY SIZE)

- ✘ Use saw equipped with integrated water delivery system that continuously feeds water to the blade
- ✘ Operate & maintain according to manufacture
- ✘ Respiratory protection indoors or in enclosed area must be APF 10
- ✘ Outdoors < 4 hrs no respiratory protection req
- ✘ Outdoors > 4 hrs must use APF 10

DRILLS

- ✘ Use drill equipped with commercially available shroud or cowl with dust collection system
- ✘ Operate & maintain according to manufacture
- ✘ Use a HEPA vac for cleaning holes
- ✘ No respiratory protection required

HANDHELD GRINDERS FOR MORTAR REMOVAL

- ✘ Use grinder equipped with commercially available shroud or cowling with dust collection system
- ✘ Operate & maintain according to manufacture
- ✘ Dust collector 99% efficiency and 25 CFM per inch of blade diameter
- ✘ Respiratory protection APF 10 < 4 hrs
- ✘ Respiratory protection APF 25 > 4 hrs

COMMON APF VALUES

Half Mask and Full Facepiece Respirators

- Tight-fitting
- Negative pressure
- Uses replaceable filters or cartridges
- Full facepiece provides eye protection



Half Mask
NIOSH APF = 10



Full Facepiece
NIOSH APF = 50

COMMON APF VALUES

Powered Air-Purifying Respirator (PAPR)

- An air-purifying respirator that uses a blower to force the ambient air through air-purifying elements to the respirator
- Loose fitting minimum air flow = 6 cfm
- Tight fitting minimum air flow = 4 cfm




NIOSH APF = 25 (loose fitting)
NIOSH APF = 50 (tight fitting)

COMMON APF VALUES

Filtering Facepiece

- Tight-fitting
- Negative pressure
- Only for use against particles
- Disposable
- One of most common types used in industry



Filtering Facepiece
NIOSH APF = 10

SILICA RESOURCES

- ✘ OSHA 3681 - Crystalline Silica Rule for Construction Factsheet
- ✘ OSHA 3902 - Compliance Guide for the Respirable Crystalline Silica Standard
- ✘ OSHA 3384 - Small Entity Guide for Respiratory Protection Standard
- ✘ OSHA 3352 - Assigned Protection Factors for Respirators
- ✘ OSHA 3632 - Controlling Silica While Tuckpointing Factsheet
- ✘ OSHA 3628 - Controlling Silica While Grinding Factsheet
- ✘ OSHA 3627 - Controlling Silica While Using Handheld Saws
- ✘ OSHA 3630 - Controlling Silica While Using Rotary Hammers
- ✘ OSHA 3631 - Controlling Silica While Using Stationary Saws

CONFINED SPACE

By definition, a confined space:

- ✘ Is large enough for an employee to enter fully and perform assigned work;
- ✘ Is not designed for continuous occupancy by the employee; and
- ✘ Has a limited or restricted means of entry or exit.

PERMIT REQUIRED CONFINED SPACE

By definition, a permit-required confined space has one or more of these characteristics:

- ✘ Contains or has the potential to contain a hazardous atmosphere;
- ✘ Contains a material with the potential to engulf someone who enters the space;
- ✘ Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by a floor that slopes downward and tapers to a smaller cross section; and/or
- ✘ Contains any other recognized serious safety or health hazards

SPACES IN RESIDENTIAL HOMES

- ✘ Attics, basements and crawl spaces are generally not classified as permit-required confined spaces, with possible exceptions:
 - + Extreme heat in attic (not defined by OSHA)
 - + Exposed live electrical wires

IMPORTANT CONSIDERATIONS

- ✘ Is there potential for entrapment or toxic fumes
- ✘ Is there potential for injury or incapacitation

- ✘ How will you recognize a problem
- ✘ How will you get worker out (safely) if any of those things happen
- ✘ You need a plan before allowing employees to enter a confined space

CONFINED SPACE RESOURCES

- ✘ OSHA 3914 – Confined Spaces in Residential Construction
- ✘ OSHA 3138 – Permit Required Confined Spaces
- ✘ OSHA 3214 - Confined Space Quick Card
- ✘ OSHA 3849 - Is 911 Your Rescue Plan
- ✘ OSHA 3825 - Confined Spaces Compliance Guide

SCAFFOLDING

- ✘ Scaffolding is commonly used in our trade, but is it used properly?
- ✘ There are extensive rules and training requirements for the use of scaffolding

SCAFFOLDING HIGHLIGHTS

- ✘ Fall protection req on scaffolding when above 10 ft unless full guardrails are in place
- ✘ Guardrails 38 to 45 inches above deck
- ✘ Footings should be level and capable of supporting the tower
- ✘ Platforms should be fully decked
- ✘ Towers with height to base greater than 4 to 1 secured by guying, tying or bracing
- ✘ Toeboard requirements to prevent falling objects

SCAFFOLDING TRAINING

- ✘ Training for each employee who works on scaffolding
- ✘ Competent Person training required for a site supervisor to direct workers dismantling, erecting or moving scaffolding
- ✘ Competent Person req for daily inspection
- ✘ Competent Person req to determine when it is safe or unsafe to continue operations

SCAFFOLDING TRAINING

- ✘ Authorized Person and Competent Person training available locally from many scaffold companies, and is also available online
- ✘ Competent Person training is usually a 1 day class

SCAFFOLD RESOURCES

- ✘ OSHA 3150 - Scaffolding Use in Construction
- ✘ OSHA 3722 - Narrow Frame Scaffolds
- ✘ OSHA 3857 - Ladder Jack Scaffolds
- ✘ OSHA 3759 - Tube and Coupler Scaffold Erection Factsheet
- ✘ OSHA 3760 - Tube and Coupler Scaffold Planning

FALL PROTECTION

FALL PROTECTION

- ✘ # 1 and # 9 on the OSHA Top 10 list of fines from OSHA
- ✘ Highly relevant for our industry
- ✘ Current rules seem to have a commercial/industrial slant
- ✘ Current rules are inflexible and often impractical or infeasible in the residential setting

CURRENT REQUIREMENTS

- ✘ If you are over 6 feet above a lower surface then you must use fall protection via one of the following methods:

- + Personal Fall Arrest System
- + Guardrails
- + Safety Nets



LOW SLOPE

- ✘ On low slope roofs (OSHA defines as $\leq 4/12$) you may also use:
 - + Warning Line Systems
 - + Safety Monitors
 - + Fall Restraint



ROPE ACCESS



ROPE ACCESS TRAINING

- ✘ The next CSIA Rope Access class will be May 21 & 22 in Montgomery, TX.



RIDGE PRO



THE GOAT STEEP ASSIST



NCSG OSHA TASK FORCE

- ✘ NCSG has been working with OSHA for more than a decade seeking common sense provisions in their Fall Protection requirements
- ✘ Current proposal highlights include:
 - + Distinction between short & long duration tasks
 - + Exemption for short duration, low slope
 - + Recognition of rope access and roof assist devices
 - + Use of chimney as anchor
 - + Clarification of 3-point contact rule
- ✘ Can't discuss details yet but I'm encouraged by current status

FALL PROTECTION RESOURCES

- ✘ OSHA 3146 – Fall Protection in Construction
- ✘ OSHA 3666 – Fall Prevention Training Guide
- ✘ OSHA 3755 – Protecting Roofing Workers
- ✘ OSHA 3903 – Fall Protection Fact Sheet
- ✘ OSHA Fall Protection Poster

LADDERS

LADDER GENERAL REQUIREMENTS

- ✘ Ladder 3 feet above roof edge
- ✘ Ladder angle – 4 to 1 slope
- ✘ Don't exceed weight ratings
 - + Verify weight of new hires if in doubt
- ✘ Watch for electrical lines
- ✘ Place ladder on stable level surface
- ✘ Inspect ladders on regular basis

LADDER WEIGHT RATINGS

Type IAA (Extra Heavy Duty)	375 pounds
Type IA (Extra Heavy Duty)	300 pounds
Type I (Heavy Duty)	250 pounds
Type II (Medium Duty)	225 pounds
Type III (Light Duty)	200 pounds

TRAINING FOR NEW PERSONNEL

- ✘ American Ladder Institute is an industry group supported by ladder manufacturers
- ✘ Has free online training with quizzes
- ✘ Great for new hires
- ✘ <https://www.americanladderinstitute.org>
- ✘ Back up with hands-on training

SECURE YOUR LADDERS

- ✘ At the roof edge with standoffs or clamps
- ✘ At the feet – feet dug in or other (tied, spiked, screwed to deck, etc)
- ✘ Decks are notoriously slippery, special precautions required
- ✘ Don't forget securing to vehicle @ both ends

LADDER RAIL EXTENDERS

- ✘ Provide step through rails at the roof transition
- ✘ Much nicer/safer than stepping around the rails
- ✘ Does make ladder top heavy when raising



LADDER LOCK

- ✘ Provide attachment of ladder to roof edge or gutter
- ✘ Help prevent damage to gutter
- ✘ Works well & easy to use



CROSS STEP LADDER

This is called a Cross Step ladder, these pictures are from the Louisville Ladder website



STANDOFFS AND LEVELERS



LADDER RESOURCES

- ✘ OSHA 3124 – Stairways and Ladders
- ✘ OSHA 3246 – Ladder Safety Quick Card
- ✘ OSHA 3660 – Safe Use of Extension Ladders
- ✘ OSHA 3662 – Safe Use of Step Ladders



AERIAL WORK PLATFORMS

AERIAL WORK PLATFORMS

- ✦ How many of you are using some type of aerial lift or work platform ?
- ✦ OSHA has specific training requirements for operators
- ✦ Training usually available where you rent or buy the machines

AWP GENERAL REQUIREMENTS

- ✦ Fall protection required
- ✦ Follow manufacturer specs with regard to moving with personnel in basket, outriggers, loading, operation
- ✦ Stay at least 10 feet from electrical lines
- ✦ Operators need training

AWP OR LIFT ADDITIONAL RESOURCES

- ✦ OSHA 3267 – Aerial Lift Quick Card
- ✦ OSHA Aerial Lifts Factsheet

- ✦ Rental company or supplier
- ✦ Manufacturer
- ✦ Online training

POWERED INDUSTRIAL TRUCKS (FORKLIFTS)

- ✦ Forklift operators must be trained
- ✦ Training must include demonstration of operating skills
- ✦ Refresher training required every 3 years



PIT / FORKLIFT ADDITIONAL RESOURCES

- ✦ OSHA Powered Industrial Truck FAQ
- ✦ OSHA Powered Industrial Truck regs

- ✦ Local equipment supplier / dealer

Lockout / Tagout

CONTROL OF HAZARDOUS ENERGY

LOCKOUT / TAGOUT

- ✘ Think about the equipment you and your techs are working on
- ✘ What is the potential for electrocution and what are you doing to prevent it
- ✘ Written plan and employee training required

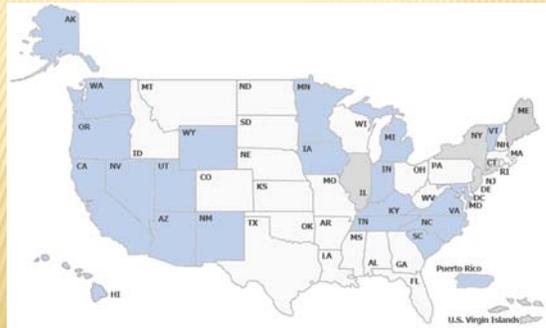
WHEN STANDARD DOES NOT APPLY

- ✘ Lockout / tagout requirements do not apply to cord connected equipment when the employee has exclusive control of the plug

LOCKOUT / TAGOUT RESOURCES

- ✘ OSHA Lockout Tagout Factsheet
- ✘ OSHA 3120 – Control of Hazardous Energy

OSHA STATE PLANS



TRAINING REQUIREMENTS

- ✘ Keep good records
- ✘ If it isn't documented it didn't happen

- ✘ OSHA 2254 – Training Requirements in OSHA Standards - this 270 page document lists specific training items that employers are required to provide

LOCAL TRAINING RESOURCES

- ✘ AAA for Driver training
- ✘ Red Cross for First Aid training
- ✘ Safety equipment vendors
- ✘ Equipment suppliers
- ✘ Trade schools
- ✘ Colleges

GENERAL DUTY CLAUSE

- ✘ Employers are required to provide their employees with a place of employment that "is free from recognizable hazards that are causing or likely to cause death or serious harm to employees."
- ✘ The courts have interpreted OSHA's general duty clause to mean that an employer has a legal obligation to provide a workplace free of conditions or activities that either the employer or industry recognizes as hazardous and that cause, or are likely to cause, death or serious physical harm to employees when there is a feasible method to abate the hazard.
- ✘ This includes heat-related hazards that are likely to cause death or serious bodily harm.

MANUFACTURER REQUIREMENTS

- ✘ OSHA requires you to follow all manufacturer rules and instructions for the products, tools and equipment you are using
- ✘ Failure to follow manufacturer requirements can be the basis for a fine, even when you didn't violate a specific written OSHA requirement

LEAD BY EXAMPLE

- ✘ Managers and supervisors must lead by example, and set the tone for the Company Safety Plan
- ✘ Managers must provide constructive feedback and disciplinary warnings as needed
- ✘ OSHA wants to see that your Safety Plan is being monitored and enforced

COMMON SENSE

- ✘ Keep the Grim Reaper at bay by using good common sense
- ✘ If it doesn't seem safe it probably isn't

