



OSHA Compliance & Workplace Safety Training

Holiday Inn Express – June 19, 2009

These notes correspond to information in the OSHA Compliance and Workplace Safety training manual received during this seminar.

What to learn?

- General OSHA Info
 - Team Member
- Injury/Illness Record keeping
- Overview → How to begin
- Regulations → How to comply
- Resources
- Documentation
- On site audits, JSA

“If it’s not documented, it didn’t happen”

What OSHA looks for:

- Log
- Written Plan
- Training

Need to have written programs and written plans.

Need to be customized to the location and nature of the work.

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OSHA Inspectors may ask for:

- JSA
- Training Log
- Injury Log/Illness Log
- Safety Meeting Notes

Need to communicate plans through training.

REQUIRED Written Plans

- Emergency Action Plan
- Respiratory Protection
- Bloodborne Pathogens (BBP)
- Hazard Communications
- Lock Out/Tag Out (LOTO)

Smart Companies capture everything.

Should take a look at OSHA citations to see what inspectors are citing.

Use a template to create plans and keep it current.

OSHA's purpose

“To assure so far as possible every working man and woman in the nation, safe and healthful working conditions and to preserve our human resources”

In short – “Prioritize Safety of Employees”

State Programs – Page 5

WA = WISHA / DOSH

OR = OR-OSHA

ID = No state plan, follows Federal OSHA

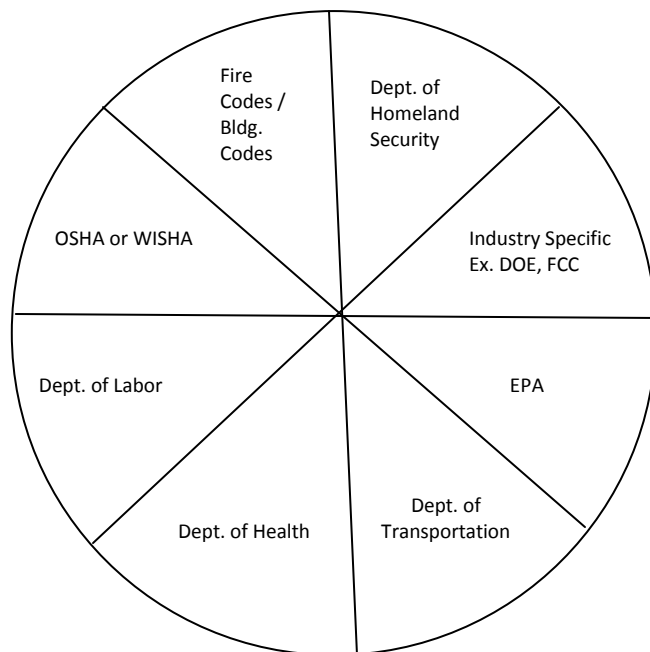
States have the option to follow Federal OSHA or state local programs.

State programs have to follow the regulations for the state where the work is done!

Federal agencies have to follow **Federal OSHA**.

Regardless of State or Federal OSHA program, you must always follow the stricter policy.

OSHA is one part of the Regulatory Pie



Types of Worker Relationships – Page 8

- Employees – only need one employee to have to follow OSHA
- Temporary employees
- Contractors

Responsibility for worker relationships

1. Most Responsible OR
2. Shared Responsible

Need to answer: Who supervises the day to day work?

Generally speaking when you contract, you manage, not supervise, therefore, the contractor is most responsible, but you are shared responsible.

Code of Federal Regulations - CFRs

1904	Recordkeeping (Injuries/Illness)
1910	General Industry
1915-1922	Maritime
1926	Construction
1928	Agriculture

How do you have access to what works for you? Online, hardcopy

OSHA Regulations

What do they mean?

- Directives
- Interpretive Letters
- Reference Standards

Do you have access to OSHA regulations that are specific to your industry?

General Duty Clause – Page 9

Section 5

a. Each Employer:

1. Shall furnish to each of his or her employees employment and a place of employment that are free from recognized hazards which are causing or are likely to cause death or serious physical harm to his or her employees.
2. Shall comply with Occupational Safety and Health standards and all rules, regulations, and orders issued pursuant to this act that are applicable to his or her own actions and conduct.

In short – “Provide a safe work place”

- b. Each Employee shall comply with Occupational Safety and Health standards and all rules, regulations, and orders issued pursuant to this act that are applicable to his or her own actions and conduct.

Make a safe work place **AND** Make Safety everybody’s job.

Ergonomics

- Make the work fit the worker
- Responsible for high percentage of Worker's Comp. claims
- Falls under General Duty Clause

Guidelines are no enforceable. Guidelines are not regulations.

Workplace Violence – Page 48

- Stranger violence
- Client violence
- Employee violence

What methods do we use to find hazards?

What methods do we use to fix hazards?

Inspection Process / Proactive Safety Audits – Pages 12-13

In house inspections are to be conducted by the employees and not the same person all the time. Having different people assess the situation will increase overall safety awareness.

General Worksite Analysis

Site Self Inspection

- Covers entire worksite
- Specific – measurable – OSHA regs.
- Document
 - Hazard Identified
 - Prevention or Control
 - FIXED

Self Inspection

- Announced and unannounced
- Include workers and supervisors
- Vary routes
- Bring in different eyes
- Review Safety Committee records
- Review written plans annually

Job Safety Analysis (JSA) – Pages 14-15

Review of work activities to spot hazards and determine if the employees are adequately protected from these hazards.

Example of JSA:

Task			
Steps	Hazard	Prevention Control	PPE
	Cut	1. Engineering (Eliminating problem)	
	Fall	2. Work Practice	
	Ergonomic	3. Admin. Control (Warnings)	
	Chemical		
	Biological		

Hazard Prevention & Control – Page 16

- Engineering (action to eliminate the hazard)
- Work Practice (outlined procedures to manage the hazard)
- Administrative Controls (Warnings about hazard)
- Personal Protective Equipment (Last Resort)

Training Requirements – Pages 17-19

What makes “training” work?

Training requirements are embedded in the OSHA Regulations. You must read through the regulations to pick out requirements.

- When to train – Initial, change/annual, conditional
- Who can train – someone who is competent, qualified or knowledgeable on topic
- What to train

Document all Safety Training (Keep for 3 years)

- Who – print name and initial/signature of person who received training
- When – date of the training
- Instructor – name & credentials
- Topic
- Key Elements – required by the regulations

Documentation to Support Effective Safety Programs

- Safety Policy
- Written Programs/Plans
- Training
- Worksite Analysis
 - On-site inspections
 - JSA – task inspections
 - Prevention maintenance
- Accident Investigation
 - Incident Form
 - 300 Log/300A
 - Workers Comp.
 - Exposure Incident Report (Keep for 30 years)
 - Employee Medical Record (need to keep for 30 years after the end of employment)

Reporting/Recording Injuries & Illnesses

Death or inpatient hospitalization

- Need to call OSHA or WISHA with 8 hours
- A reportable injury or illness means YOU call OSHA.

Reporting Catastrophes – Page 20

OSHA Recordkeeping – Page 21

- 300 Log
- 300A
- 301

Who has to use these forms? - Page 72

Some companies are partially exempt.

Exemption is determined by the size of company and type of work.

Logs are kept by each establishment, where the work is completed.

Emergency Action Plans (EAP) – Page 41

Emergency Response Teams

- Fire Extinguishers – Annual Training
- First Aid / CPR
- BBP Standard
- Chemical Spill Control
- Respirators & other PPE
- HAZWOPER

Blood Borne Pathogens – Annual Training – Pages 42-43

Methods of Compliance (1910.1030)

- Communicate to employees
 - Exposure Determination
- Written Plan
- Training Requirements
- HBV Vaccines
- Exposure Incidents

** DETAILS**

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Powered Industrial Trucks (Forklifts) – Pages 44-46

- Must be inspected before every use
- ANSI B56.1 standards
- Training Components
 - Formal (Truck & workplace)
 - Practical Driving skills
 - Evaluation

Forklift Retraining Requirements

- When the evaluation so indicates (3 years)
- If there has been an accident or near miss
- He or she is reportedly operating unsafely
- If there is new equipment or workplace changes

Since retraining must happen for any of these situations, it is better to have an internal trainer, than to pull employee off the forklift and wait to schedule a formal trainer.