Deadline for GHS Training is Approaching

The December 1st deadline for GHS Training is approaching and the EHSI staff has trained over 2000 NC Community College employees on the year on the changes that have been made to the OSHA Hazard Communication standard. OSHA has set a deadline of December 1st, 2013 for employers to provide training to employees who are affected by this standard. The GHS Hazard Communication training takes about an hour and can be provided in person at your college or online via EHSI’s SafetyNet online training center. If you would like to set up online or onsite classes, please contact your EHSI specialist or call Tamara Heinemann at 828-694-4738.

Drill Presses Are Covered by OSHA Machine Guarding Requirements

Reviews of NCOSH inspections performed throughout North Carolina indicate that they are citing OSHA 1910.212(a)(1) as they levy fines for unguarded chucks on drill presses. This “serious” violation not only represents a hazard to employees and students, but could also result in a fine somewhere in the neighborhood of $2000. The standard reads as follows: “One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by the point of operation, ingoing nip points, rotating parts, flying chips and sparks.” You may say to yourself, “I’ve never seen a drill press with a chuck guard…” I must confess that of the hundreds of drill presses I’ve seen throughout the years, I’ve never seen one that came with its own chuck guard either. The vast majority of drill presses in the Community College System are currently being operated without the required guard. Fortunately, chuck guards can be purchased from companies that specialize in safety and industrial supplies such as Grainger for between $100 and $200. EHSI hopes you will take a few moments to identify the drill presses on your campus that need to be fitted with a chuck guard and install this important component for the sake of your employees’ and students’ safety!

By: Allen McCullough

OSHA Standards For Ladders

When working on a portable ladder, are employees required to use fall protection and tie-off? EHSI hears this question quite often, so let’s try to find the facts using OSHA Standards and Letters of Interpretation.

Job tasks that are performed with a ladder can fall under two categories, General Industry (1910) or Construction (1926). First let’s define which is which. OSHA defines construction in 1910.12(b) as construction, alteration, and/or repair, including painting and decorating. However OSHA gives no definition for maintenance.

The Mirriam-Webster dictionary defines maintenance as the act of maintaining or the upkeep of property or equipment. New installations, or upgrades to equipment while being repaired should be considered construction. Maintaining equipment and facilities to their existing conditions should be considered maintenance.
OSHA Standards For Ladders

Most college maintenance employees probably switch between maintenance and construction activities daily.

**Tying-Off a Ladder**

Under the Construction standards, 1926.1053(b)(1) states: When portable ladders are used for access to an upper landing surface, the ladder side rails shall extend at least 3 feet (.9 m) above the upper landing surface to which the ladder is used to gain access; or, when such an extension is not possible because of the ladder's length, then the ladder shall be secured at its top to a rigid support that will not deflect, and a grasping device, such as a grabrail, shall be provided to assist employees in mounting and dismounting the ladder. In no case shall the extension be such that ladder deflection under a load would, by itself, cause the ladder to slip off its support. Remember this is only when the ladder is used to get onto the rooftop, not when it is used to stand on while working.

Also, 1926.1053(b)(8) states: Ladders placed in any location where they can be displaced by workplace activities or traffic, such as in passageways, doorways, or driveways, shall be secured to prevent accidental displacement, or a barricade shall be used to keep the activities or traffic away from the ladder.

General Industry does not follow the Construction standard. In 1910.26(c)(3) OSHA states: A simple rule for setting up a ladder at the proper angle is to place the base a distance from the vertical wall equal to one-fourth the working length of the ladder. The ladder base section must be placed with a secure footing.

**Fall Protection while on a Ladder**

OSHA Letter of Interpretation (1-13-2000) clearly states: Neither the ladder standard (29 CFR 1926, subpart X) nor the fall protection standard (29 CFR 1926, subpart M) requires fall protection for workers while working on portable ladders.

**Walking Working Surfaces**

This is probably where all the tie-off confusion started. Under the same section in General Industry, Subpart D -Walking, Working Surfaces; regulations are listed for open-sided floors or unprotected sides, but this does not apply to ladders, 1910.23(c) states: Every open-sided floor or platform 4 feet or more above adjacent floor or ground level shall be guarded by a standard railing (or the equivalent as specified in paragraph (e)(3) of this section) on all open sides except where there is entrance to a ramp, stairway, or fixed ladder. The railing shall be provided with a toeboard wherever, beneath the open sides. The Construction standard says: Each employee on a walking/working surface (horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8 m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems. [1926.501(b)(1)].

**OSHA’s Example**

In a Letter of Interpretation (5-21-03), the writer describes a situation where workers are using a ladder placed on top of a 10’ x 10’ flat structure that has three unguarded sides, each with a 10 foot drop. OSHA states that while workers are on the platform (the walking/working surface) fall protection is required. However, once the worker steps on the ladder, the requirement ends.

**Better Idea**

Whenever possible, if ladder activities will require long periods of time to complete, consider the use of scaffolds, scissors lifts or aerial platforms. In most cases they are safer and more comfortable to work from.
I2P2 It’s Back

You may have forgotten about I2P2 but it may be just around the corner. To begin with let’s refresh our memories, what is I2P2? I2P2 is federal OSHA’s Injury and Illness Prevention Program (I2P2). The legislation began in 2010 and then went into a holding pattern for a few years and now appears to be moving forward again.

There are three stages to OSHA regulatory promulgation: Pre Rule, Proposed Rule and Final Rule. After a delay OSHA is making I2P2 a top priority for 2013 per Dr. David Michaels, assistant secretary of labor for OSHA. Also two of the nation’s largest worker safety associations—the American Society of Safety Engineers and the American Industrial Hygiene Association are pushing OSHA to make I2P2 a top priority in 2013.

I2P2 should have the notice of Proposed Rulemaking by December 2013. That will switch the Pre Rule to the Proposed Rule. The Final Rule may happen in 2014 but 2015 is more likely. So we have some time to begin preparation, but since we don’t know the exact wording of the Final Rule we may have to make some assumes to prepare.

Some background for the proposed regulation is that during the past four decades that OSHA has been in existence the number of workplace deaths and occupational injuries have dropped 60 percent. Still the nation’s workers continue to face an unacceptable number of work-related deaths, injuries and illnesses; most of them thought to be preventable. Now every day more than 12 workers die on the job, over 4,500 people a year; and every year more than 4.1 million worker suffer a serious job related injury or illness. The death, injury and illness statistics have been somewhat stagnant over the past few years so a greater focus on prevention is needed to bring these numbers down.

Injury and illness prevention programs are not new and are in use in the European Union countries, many far East countries and in 15 US states. Basically the I2P2 standard will require employers to develop a program to help them find and fix hazards in the work place.

Each company’s program will have processes and elements unique to them, but OSHA recommends a few core components. A summary I2P2 core components is:

- Management Leadership—Ensure that safety leaders are identified and given clearly defined responsibilities.
- Worker participation—When studying and setting safety practices, involve the employees that work in that specific environment for which the safety practices are being made.
- Hazard assessment—Conduct periodic inspections that identify and evaluate hazards in the workplace.
- Hazard prevention and control—Install controls for all identified hazards and procedures to investigate all incidence that occur.
- Education and training—Educate employees to understand the hazard exposures for their job and how to avoid the hazards.
- Program evaluation—Document all steps of the program, have ongoing monitoring, review the program’s effectiveness at least annually, have concrete metrics, and continual improvement of the program.

www.osha.gov can give you further assistance for items that will aid you in setting up a program. Some of the items OSHA has are how to conduct a hazard assessment, Job Safety Analysis (JSA) or Job Hazard Analysis (JHA) and further information on I2P2.

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Lockout/Tagout For Motorized Vehicles

Since publication of OSHA’s Control of Hazardous Energy Sources rule in 1989, it has consistently been in the top ten violations. This rule states that, “Before any employee performs any servicing or maintenance on a machine or equipment where the unexpected startup or release of stored energy could cause injury, the equipment shall be isolated from its energy source and rendered inoperable.” 1910.147 Control of Hazardous Energy Sources is generally referred to as Lockout/Tagout. This standard requires employers to control hazardous energy during service and maintenance activities. Lockout/Tag-out applies to a multitude of employee activities in general industry and also includes automotive repair shops. Employers must ensure that vehicles, machinery, and equipment used in the automotive repair industry are made inoperable and isolated from energy release during repairs and maintenance. Any vehicle whether it’s a traditional internal combustion, or a hybrid/electric model may contain one or more of the following types of hazardous energy:

- Thermal hazards from hot fluids...
Lockout/Tagout For Motorized Vehicles

- Mechanical hazards associated with mounting and dismounting tires
- Gravitational energy and mechanical hazards resulting from the movement of elevated vehicles, machines, or equipment parts
- Chemical energy due to contact with battery acid, coolants or lubricants
- Electric battery shock, arc, and burn hazards
- Explosion hazards associated with air bags
- Fire and explosion hazards associated with the fuel and fluid systems
- Mechanical hazards associated with vehicles or vehicle components unexpectedly starting

OSHA recognizes the unique nature of vehicle repair and sometimes simply removing the key from the vehicle can adequately address the hazard of unexpected energization. However if more than one person is working on the vehicle then it becomes necessary to provide a secure storage, like a lock box, for the vehicle key. But the vehicle unexpectedly starting is just one of the potential energy hazards that OSHA recognizes. It may be necessary to disconnect the battery cable, relieve the hydraulic pressure and chock the tires before preforming some repair tasks. Because it may be difficult to judge when to use locks, tags and or energy isolation devices, employers must carefully evaluate and select lockout procedures using specific manufacturer service guidelines. For more information and to see a sample Lockout/Tagout program visit: http://www.nclabor.com/osha/consult/