OSHA Records to Have on Hand

Should you ever receive a visit from an NCOSH compliance officer, whether it is expected or unexpected, there are some important records that you will be asked to provide during their inspection. These essential records will be used to determine not only if you are actively working towards a safe workplace, but also how your college responds to a hazardous situation when it is discovered on campus.

Training Records such as a sign-in sheet from a faculty and staff-wide training event, or a specific certification like a forklift operator’s license, should be maintained with employee records. If an injury has occurred at your campus that results in an NCOSH inspection, they will want to look at documentation of the injured employee’s training history, as well as other related training events that might have included other employees. EHSI recommends that Community Colleges hold safety training events every year for faculty and staff members. We can cover subjects that are applicable to all employees like Hazard Communication and Bloodborne Pathogens awareness, or we can provide training in more specific standards like forklift operation or blood spill clean-up to members of your college maintenance staff. We offer OSHA required training both on site and on line.

The 300 Log of injury and illness reporting is a journal where you maintain basic details about work related injuries and illnesses that occur on your campus. This form is typically maintained by the same employee who manages workers compensation at each college. A NCOSH compliance officer will ask to review the 300 log at every location they inspect. In addition to 300 logs, workplaces must hang the required NC Labor law posters in an area readily visible by employees. Don’t fall for the emails where they try to sell you these posters- they are available by request free from the state at www.nclabor.com/posters/posters.

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. There should be Job Hazard Analysis records on hand for the most hazardous jobs in the workplace like cutting down trees, operating a forklift, or using a table saw. Anytime there is job related injury, the job hazard analysis should be reviewed or, if one does not exist, created during the accident investigation. For more information on Job Hazard Analysis, refer to the OSHA Publication “Job Hazard Analysis #3071” available online at http://www.osha.gov/Publications/oshareport3071.pdf.

Inspection records show that a college has a proactive approach to safety through inspections and are an excellent way to document safety issues as they are identified and corrections as they occur. EHSI is hoping to inspect every Community College campus and center this year and will be following up on issues identified in prior inspections. If there are specific dates and location where you would like to schedule your colleges inspections, please don’t hesitate to contact your EHSI specialist.

EHSI Welcomes Tamara Heinemann

EHSI is proud to welcome the newest member of our staff Tamara Heinemann. Tamara is a native of Western North Carolina and a graduate of the Blue Ridge Community College Environmental Science program. While at Blue Ridge she interned with local industry assisting with chemical inventories, record keeping, and OSHA compliance. In addition to her studies at Blue Ridge she worked under the chemistry department assisting with lab work, chemical inventory, and tutoring other students. After attending Hazardous Materials Training and Research Institute in Cedar Rapids Iowa, Tamara began her role with EHSI two years ago as an adjunct instructor. Tamara will be working with us part time as she finishes her bachelor’s degree in environmental science at Brevard College. With her assistance we will be working to update our website and utilizing new technology to assist the NCCCS system with safety training and compliance.

By: Allen McCullough

Blue Ridge Community College
The 2011 fall and winter holiday season is complete; we have celebrated Thanksgiving, Hanukkah, Christmas, and New Year’s Eve. Now with the colder weather it’s a great time learn how to use new equipment and to perform preventative maintenance (PM) on the older equipment we have in and around the house.

The tools and appliances you received as gifts or purchased on sale all have user manuals with them. Read all the manuals so you are familiar with the use and care for your new tools and appliances. Also check the manuals to see what personal protective equipment (PPE) you may need to use the equipment safely and get it before you begin using the equipment. Remember to save all manuals because we all suffer from CRS (Can’t Remember Stuff).

Some other household items that should be checked and inspected are space heaters, fireplaces, furnaces, smoke and fire alarms, carbon monoxide detectors and fire extinguishers.

Space heaters are a major cause of home fires and must be operated properly. A few things to remember about space heaters are:

- Space heaters need a clear space and have three feet of clearance around them and any combustible material.
- Plug electric heaters directly into the receptacle and not into extension cords; unplug them when not in use. Don’t run the heater cord under a carpet.
- Oil and gas space heaters can produce unsafe levels of carbon monoxide; have a carbon monoxide detector in the area.
- Turn off heaters and unplug electric units before leaving the house or going to bed.
- Use care when refueling oil or gas heaters; flammables present and fueling errors can occur.
- Check electric heaters for damaged and frayed wiring.
- Never leave children unattended by space heaters.

Fireplaces can also present a fire hazard in the home if not properly maintained. Some items to check are:

- Have the chimney and flue inspected annually and cleaned if necessary.
- Keep combustible and flammable materials off the mantel or near the fireplace, and keep the fire screen in place when a fire is burning.
- Make sure the fire is out before going to bed, and keep the flue open and the fire screen in place. Don’t burn charcoal in a fireplace; it can give off lethal amounts of carbon monoxide.

The home furnace should be check by a qualified technician annually to assure proper operation and to check for any carbon monoxide leakage to the inside of the house.

The fire, smoke and carbon monoxide alarms should be checked and tested per the manufacturer’s recommendations. The alarms should be manually tested; if batteries are used in some functions, replace them annually or when the battery alarm sounds.

Fire extinguishers should be mounted in the kitchen area and at least one other location. Periodically check the extinguishers (monthly) to assure they are ready to use. Check to make sure the charge needle is in the green zone, the handle pin and tie are secure and that no parts are damaged. A fire extinguisher may have a service life or information on it as to when it needs to be serviced by a fire extinguisher company.

These are a few of the checks and preventative maintenance items you can use to make your home a safer environment. Hopefully you had a happy and safe holiday season, and may the new year be even safer.
Exit Routes and Exit Doors

As EHSI conducts safety inspections, we try to focus on exit routes and exit doors, and we do see violations to the regulations fairly often. Let's review some of the regulations regarding exits.

Occasionally we see hallways that are used for storage, maybe while offices are being moved or renovated. In some of the vocational and maintenance areas, materials are stored in a manner that is blocking doors or the path to the door. No matter how convenient or temporary the situation, ADA [28CFR36], NFPA101 and OSHA [1910.36(g)(4)] regulations state that the width of exit route must maintain at least 36 inches throughout at all times. Also when items are stored in hallways, they sometimes block other important safety items such as fire extinguishers, fire alarm pull stations, or wall-mounted AEDs. Signs showing the exit route should never be hidden from view.

Exit doors must be at least 32 inches wide according to ADA 28CFR36(4.13.5). Some older buildings have exit doors that open inward. OSHA states in 1910.36(e)(2) The door that connects any room to an exit route must swing out in the direction of exit travel if the room is designed to be occupied by more than 50 people or if the room is a high hazard area (i.e., contains contents that are likely to burn with extreme rapidity or explode). Each college must determine the hazards and occupancy for these rooms.

Exit doors cannot have deadbolt locks, padlocks, slide-bolt locks, etc. EHSI cites NFPA 5-2.1.5.3 A latch or other fastening device on a door shall be provided with a releasing device having an obvious method of operation under all lighting conditions. The releasing mechanism for any latch shall be located not less than 30 in (76 cm) nor more than 48 in. (122 cm) above the finished floor. Doors shall be openable with not more than one releasing operation. EHSI also cites 1910.36(d)(1) Employees must be able to open an exit route door from the inside at all times without keys, tools, or special knowledge. A device such as a panic bar that locks only from the outside is permitted on exit discharge doors. After the 1991 fire in Hamlet, NC that killed 25 people who could not escape the burning building due to locked exit doors, I feel NC OSHA will strictly enforce this regulation.

EHSI attempts to check the emergency lights while we are conducting a safety inspection. Some lights are above our reach, so we recommend that each college set up their own regularly scheduled inspection. A nighttime check of these lights, while the other lights are turned off, will indicate if the emergency lights are sufficient and aimed correctly. OSHA states in 1910.37(b)(1) Each exit route must be adequately lighted so that an employee with normal vision can see along the exit route.

The exit sign must be visible at all times, either by an internal light source or by ambient illumination. Either way the signs must be visible during power outages, probably with a battery back-up device. OSHA cites this in 1910.37(b) Each exit must be clearly visible and marked by a sign reading "Exit." Also in 1910.37(b)(6) Each exit sign must be illuminated to a surface value of at least five foot-candles (54 lux) by a reliable light source and be distinctive in color. Self-luminous or electroluminescent signs that have a minimum luminance surface value of at least .06 footlamberts (0.21 cd/m²) are permitted.

In 1910.37(b)(3) OSHA prohibits the posting of notices and other materials on exit doors; Each exit route door must be free of decorations or signs that obscure the visibility of the exit route door.

In large areas or long winding hallways, OSHA requires the direction of travel for exit routes to be marked and illuminated. In 1910.37(b)(4&5) it requires, If the direction of travel to the exit or exit discharge is not immediately apparent, signs must be posted along the exit access indicating the direction of travel to the nearest exit and exit discharge. Additionally, the line-of-sight to an exit sign must clearly be visible at all times.

Doors along the exit route that might be mistaken for the actual exit door should be marked with a "Not An Exit" sign as stated in 1910.37(b)(5) Each doorway or passage along an exit access that could be mistaken for an exit must be marked "Not an Exit" or similar designation, or be identified by a sign indicating its actual use (e.g., closet).
Ask EHSI

Answers to standards or regulations questions that are researched by the EHSI staff.

Question: Are college employees such as maintenance, groundskeepers and truck driver training faculty required to wear high-visibility apparel when working on or near campus roadways and parking lots?

Answer: Beginning January 1, 2012, employers will need to provide and require the wearing of appropriate ANSI approved high-visibility apparel. The Department of Transportation (DOT) 2009 Manual on Uniform Traffic Control Devices (MUTCD), Section 6D.09 affects workers in all traffic areas and the right-of-way. This new rule covers all roadways and parking lots where vehicles can be driven, including private property. Affected workers within all areas of the right-of-way are now required to wear high-visibility safety apparel that meets performance class 2 or 3 of ANSI/ISEA 107-2004.

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EHSI SafetyNet Training Schedule

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<th>Date</th>
<th>Topic</th>
<th>(all training starts at 10:00 a.m.)</th>
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<tbody>
<tr>
<td>2-7</td>
<td>Hazard Communication &amp; Bloodborne Pathogen Awareness</td>
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<td>2-21</td>
<td>Office Safety</td>
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<tr>
<td>3-6</td>
<td>Hazard Communication &amp; Bloodborne Pathogen Awareness</td>
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<td>3-20</td>
<td>Groundskeeper Safety</td>
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<tr>
<td>4-3</td>
<td>Hazard Communication &amp; Bloodborne Pathogen Awareness</td>
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<tr>
<td>4-17</td>
<td>Indoor Air Quality</td>
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EHSI 2012 Spring Conference (East)
The 2012 conference will be held on May 9 & 10 at Cape Fear Community College in Wilmington. This year the conference will offer OSHA 10 Hour for General Industry training. More details to come.

Environmental Health & Safety Institute
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Blue Ridge Community College
Preparing North Carolina’s World-Class Workforce