

The Safety & Health Advisor

Fall 2008



Safety Considerations for an Aging Workforce

The workforce in today's society in the United States and indeed in many developed countries is experiencing an increase in age. The Bureau of Labor Statistics (BLS) estimates that over fifty (50%) percent of today's workers are over the age of 50 and that approximately one-quarter of individuals between 65 and 74 are still actively working. What is even more amazing is that the baby boomer generation (those born between 1946 and 1964) has not even reached the age of 65 yet! The CDC (Centers for Disease Control) in its report "The State of Aging and Health in America 2007" indicates that longer life spans and baby boomers will double the over 65 population during the next 25 years.

The BLS provides some eye opening information on aging and employment trends in a recent July 2008 spotlight article that can be found on their website at http://www.bls.gov/spotlight/2008/older_workers/. General study findings show that older workers are more experienced, usually perform better and have less injuries than those that are younger; however with age comes some decrease in visual acuity, hearing, balance, reaction time, strength and the ability to heal from injury.

These latter factors can have a significant impact on injury exposure and usually increases the severity of injuries when they do occur. Typical injuries experienced by older workers include acute and repetitive strains; and falls, which are the leading cause of injury deaths and hospital admissions among older persons according to the CDC. An older worker may take longer to recover from an injury and therefore increase lost workdays and costs to employers.

Highlights in this Issue

- ❖ Safety Considerations for an Aging Workforce
- ❖ Dangers of Distracted Driving
- ❖ OSHA Issues Final PPE Rule
- ❖ OSHA - National Emphasis Program for Lead
- ❖ Machine Accident Prevention

To help maintain a healthy older workforce, the employer may want to consider some of the following prevention ideas.

- Ensure adequate general illumination in the work environment as well as proper task lighting at workstations.
- Evaluate ergonomics associated with workstations and work tasks to decrease potential musculoskeletal disorders, strains or poor reaction time injuries. These could lead to changes in work practices, signs, controls and/or equipment.
- Evaluate walking and working surfaces, stairways and railing systems, housekeeping as well as footwear to reduce the potential for slips, trips and falls.
- Take steps to reduce noise levels in the workplace, even if they are less than regulated limits.
- Encourage workers to participate in wellness programs and also get preventive medical checkups, particularly vision and hearing screening.
- Consider modifications to work schedules, which might avoid shift rotations, work in daytime and/or reduced hours.
- Pay particular attention to jobs requiring operation of machinery or motor vehicles, which have severity potential.

Now is the time for organizations to evaluate their current workforce with respect to age factors and implement the necessary safety measures to protect their employees now and in the future.

Dangers of Distracted Driving

Driving is a risky activity. Each year, more than 40,000 people are killed in motor vehicle crashes and over 3 million are injured. Research indicates that driver distraction is a contributing factor in 25-50% of all crashes, causing an estimated 4,000 to 8,000 traffic crashes each day, the impact on

The Safety & Health Advisor

Fall 2008

employers is significant. These crashes pose a major risk to employers of all sizes which ultimately means a risk to the company's bottom line.

Longer commutes, an increase in heavy traffic, the availability of in-vehicle technology are all factors that result in driver distraction. More time in the vehicle results in less time at home or on the job, causing drivers to feel the pressure to multi-task to keep up with their responsibilities. Countless distractions tempt drivers to forget that their primary responsibility is to drive focused and stay safe.

Distracted driving has eclipsed drunk driving as the Number One safety concern of the driving public. Some organizations have devoted to traffic safety have provided employers and employees with information on distracted driving. During Driver Safety Work Week (DSWW) 2001, The Network of Employers for Traffic Safety (NETS) released the results of a national telephone survey conducted in August showed that distracted driving had become an increasingly dangerous trend. Nearly all drivers-94%-reported having engaged in activities that are potentially distracting while driving. More startling, 39% of respondents reported engaging in distracted driving activities primarily while driving for work. These survey results highlight the need for increased involvement from employers who often bear the costs when an employee is involved in a traffic crash.

NETS developed a Distracted Driver Tool Kit so that employers would have a training program to enable their employees to identify potential distractions while driving and develop techniques and strategies to better manage these distractions. The Tool Kit contains a video highlighting eight scenarios of in-vehicle distractions, a Leader's Guide, a Rate-Your-Risk Quiz, incentives and other useful tools and information. Their website is www.trafficsafety.org

On its website, www.nsc.org, the National Safety Council (NSC) posted a Multitasking Statement. NSC states that they recognize that electronic devices such as cell phones provide extraordinary

benefits to public safety and productivity. However, a driver's first responsibility is the safe operation of the vehicle and that best practice is to not use electronic devices including cell phones while driving. When on the road, NSC states that drivers should concentrate on safe and defensive driving and not on making or receiving phone calls, delivery of faxes, using computers, navigation systems, or other distracting influences.

The NSC and Nationwide Insurance have announced they will sponsor an International Symposium on Distracted Driving, Oct. 14-15 in Arlington, Virginia. The symposium will convene leaders in transportation and safety, the auto industry, business, education, and government and social sectors to confront an urgent and escalating safety issue: driving while distracted, which accounts for a significant portion of today's motor vehicle-related injuries and deaths. Information on this Symposium can be viewed at www.nsc.org

Studies have associated distracted driving with 'impaired' driving. A recent Carnegie Mellon study shows that just listening to a cell phone while driving is a significant distraction and it causes drivers to commit some of the same types of driving errors that can occur under the influence of alcohol. The study, for the first time, used brain imaging to document that listening alone reduces by 37 percent the amount of brain activity associated with driving. This can cause drivers to weave out of their lane, based on the performance of subjects using a driving simulator. An University of Utah Study revealed that drivers on mobile phones are more impaired than drivers at .08 BAC.

General Motors has an interactive demonstration that helps Drivers assess their own distractibility while driving. It can be viewed at www.gm.com/experience/education/9-12/drivers_education/distracted_driving/index.html

Safe driving practices require that you constantly search the roadway ahead for situations that could require you to take quick action. Recognize that driving requires your full attention. Drive Focused. Stay Safe. Avoid Distracted Driving.

The Safety & Health Advisor

Fall 2008

OSHA Issues Final PPE Rule

On November, 14, 2007, the Occupational Safety and Health Administration (OSHA) announced a final rule on Employer Payment for Personal Protective Equipment (PPE). This rule became effective on February 13, 2008. OSHA is allowing a six (6) month grace period. By May 15, 2008, all companies should be in compliance.

The final rule establishes a uniform requirement that employers pay for all types of PPE required under the standard. There are exceptions for certain ordinary protective equipment such as safety-toe footwear, prescription safety eyewear, everyday clothing, uniforms, caps, items worn to keep clean such as hair nets, logging boot and weather-related gear (note: clothing used in artificially-controlled environments with extreme hot or cold temperatures such as freezers, are not considered part of the weather gear exception).

Background

OSHA first announced the rule in 1997 and proposed it in 1999 after the Occupational Safety and Health Review Commission concluded that OSHA's existing PPE standard did not clearly state that employers should pay for workers' protective equipment. In 1999, OSHA issued a proposal to require employers to pay for all protective equipment, including PPE with explicit exceptions for certain safety shoes, prescription safety eyewear, and logging boots.

The proposal cited three (3) primary reasons for requiring employers to pay for PPE. First, OSHA concluded that the OSHA Act of 1970 implicitly requires employers to pay for PPE that is necessary to protect the safety and health of employees. Second, OSHA concluded that employer paid PPE would result in safety benefits by encouraging employees to use and maintain PPE. Third, OSHA concluded that previously there was no clarity regarding who would pay for PPE. Company practices for providing PPE were found to be quite diverse. Many employers pay for some items and not for others, either as a matter of collective bargaining or long standing tradition.

OSHA establishes new National Emphasis Program for Lead

OSHA recently issued a directive, CPL 03-00-009 that implements a National Emphasis Program (NEP) to reduce occupational exposures to lead. This document supersedes the 2001 OSHA National Emphasis Program on Lead (CPL 02-00-130). The new NEP directive contains a list of industries included to assist OSHA's field offices in determining industries for targeting.

Under the NEP, OSHA will direct resources towards inspections of industries in which lead exposures occur. Subsequent to an initial inspection, follow-up site visits will be conducted in all establishments where exposures were measured at or above the permissible exposure limit (PEL) or above the action level where the employer has not taken preventive/corrective action (as required by the standard).

Employee exposure to airborne lead will be sampled, whenever possible, during both the initial and follow-up inspection. Medical surveillance records will be reviewed, whenever available, by Compliance Officers during NEP lead inspections. In addition, during both the initial and follow-up inspections, Compliance Officers will evaluate training, use of personal protective equipment, surface concentrations of lead and the availability of hygiene facilities, work practices, and engineering controls.

The directive can be viewed at

http://www.osha.gov/OshDoc/Directive_pdf/CPL_03-00-0009.pdf.

Appendix A contains the targeted SIC/industry list.

Clarification of the rule

- Employers must pay for replacement PPE used to comply with OSHA standards. However, if an employee loses or intentionally damages PPE, the employer is not required to pay for its replacement.
- Employers cannot require employees to provide their own PPE. An employee's use of PPE that he or she already owns must be completely voluntary.

The Safety & Health Advisor

Fall 2008

- When an employee provides his or her own PPE, the employer must ensure that the equipment meets OSHA standards. Employers are not required to reimburse employees who choose their own PPE.

For more information regarding OSHA's Final Rule on Employer Payment for PPE, see the following web site link:

[www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=20094&p_table=FEDERAL REGISTER](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_id=20094&p_table=FEDERAL_REGISTER)

Machine Accident Prevention

Serious machine related accidents frequently result in amputations or other seriously disabling traumatic hand or finger injuries that cause a permanent disability. The U.S. Bureau of Labor Statistics 2005 annual survey data indicated that there were 8,450 non-fatal amputation cases involving days away from work in private industry across the country. Approximately forty-four percent (44%) of all workplace amputations occurred in the manufacturing sector. During a recent review of Atlantic Charter serious machine related claims during 2007 at manufacturing companies, approximately fifty percent (50%) of the cases occurred in companies that manufacture durable goods followed by thirty one percent (31%) that occurred in food processing industries. Over thirty percent (30%) of all the injuries occurred while the employee was cleaning or un-jamming the machine when it was still running.

Many of the serious injuries we have investigated during the past year involved failure to follow lockout/tagout procedures during service or maintenance. According the OSHA standard addressing the control of hazardous energy (lockout/tagout), LOTO must be performed if activities require the employee to remove or bypass a guard or safety device, or place any part of the body into a danger zone. OSHA requires machinery-specific lockout procedures for equipment containing two or more energy sources. (See 29 CFR 1910.147(c)(4).)

It is also critical to develop specific procedures for safely clearing jams to reduce the risk for machine accidents regardless of whether the machine jams frequently or infrequently. All employees operating machinery must understand how to safely address the situation without putting themselves or a co-worker at risk. The lockout/tagout standard makes a limited exception for minor service activities that take place during normal production operations when they are routine, repetitive and integral to the use of the equipment for production, provided that the work is performed using alternative measures that provide effective employee protection. Many occupational injuries occur due to unsafe work practices or incorrect work procedures/methods. Unsafe work practices can occur for a variety reasons such as poor work habits that develop over time for the experienced operator. These habits can involve operators who habitually take shortcuts in an attempt to save time that puts them at risk for injuries. One example is a machine operator who does not wait until a saw or cutting drill has come to a complete stop before reaching into a danger zone to remove a part. Unsafe work practices can also occur when an inexperienced operator encounters a machine jam or malfunction they are not familiar with. They may attempt to remedy the situation by trying to clear scrap material from a moving conveyor with their fingers without realizing the location of pinch points and nip points while the conveyor is in motion.

A fundamental responsibility of a manager/supervisor must be to develop and establish the procedures to be used and continuously enforce them. Safety training in these procedures may include formal classes, written tests, one-on-one discussions, on-the-job training, and skill demonstrations. Supervisors should identify and document the safety training requirements for each employee or task for which they are responsible. New employees (including personnel reassigned from other departments and seasonal help) require training to make sure fully understand the work methods and safety practices for the machines they will be operating. Training frequency will vary with respect to the nature of the work environment and the skill/knowledge level required to be maintained. Documentation of all training activities is essential and should include the subject of the training, date,

The Safety & Health Advisor

Fall 2008

trainer's name, content/length of training, and the personnel trained.

Operating procedures should specifically address what to do if the machine jams or if there is a buildup of scrap material during operations. In some cases, it may be desirable to "certify" individuals as authorized operators for specific machinery that are complex in nature or have unusual hazards such as automation. The following is a list of general rules for safe operation of machinery you can customize for your operations:

- Do not operate any machine unless qualified and authorized by your supervisor to use it. Never attempt to operate any machinery or equipment that is unfamiliar to you!
- No machine should be started unless all guards are in place.
- Never attempt to reach into a machine to clear a jam or remove scrap material without following specified machine safety guidelines.
- Machine guards may be removed only to make necessary adjustments and repairs while the machine is stopped and the machine is de-energized or power source is under the direct control of the operator. Guards must be replaced before the equipment is placed back into operation.
- Never attempt to stop a machine by using the hand or any part of the body as a brake.
- Before starting any machine, ensure the controls are set to run within safe specifications.
- Report unsafe or hazardous conditions to your supervisor immediately.
- Any slippery substance such as oil, grease, water, food debris, etc. spilled on the floor must be wiped up immediately.
- Keep fingers away from moving machine parts. Never reach over dangerous moving parts or lean over the work so that hair or clothing can become entangled in rotating parts.
- In woodworking operations, always use a feed or pusher-stick when feeding stock or narrow stock against power-driven saws or cutters.

References: OSHA publication 3170 - Safeguarding Equipment and Protecting Employees from Amputations- Small Business

Safety and Health Management Series - OSHA 3170-02R 2007

www.osha.gov/Publications/osha3170.pdf

If you need assistance in evaluating your ergonomics or safety and health program, please contact Neal Freedman, John Cotnam, Margie Lobaton, or Mark Hickox from Atlantic Charter's Safety and Health Department at (617) 488-6500.