

The Safety & Health Advisor

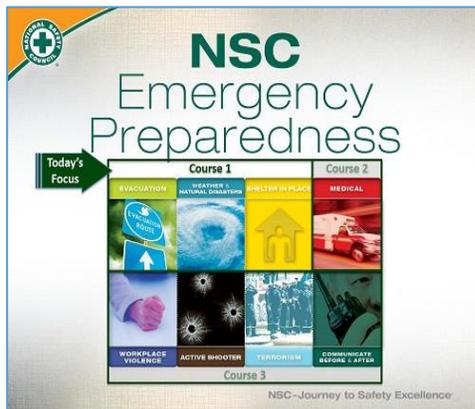
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Emergency Preparedness Online Certificate Training Program

An unexpected emergency can strike at any time: a heart attack, an active shooter, a terrorist event. That's why it's so important to have employees who can respond quickly and effectively. The National Safety Council (NSC) Emergency Preparedness Online Certificate Program can help your employees know how to respond in the event of an emergency.

NSC's online emergency preparedness program can be taken at any time and place that is most convenient for your employees. See <https://www.nsc.org/safety-training/workplace/emergency-preparedness> for additional details and pricing. It takes approximately eight (8) hours to complete all the modules. Once employees have completed the entire program, they will receive a certificate of completion in Emergency Preparedness.*



The course consists of eight modules

- Evacuation
- Weather & Natural Disasters
- Shelter in Place Emergencies
- First Aid, CPR & AED
- Workplace Violence
- Active Shooter
- Terrorism Emergencies
- Communication Before and After Emergencies

Highlights in this Issue

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*All components of the program must be completed to receive a certificate. Certificates are valid for two (2) years. Upon expiration, the certificate can be renewed.

Revised ANSI Standards for Aerial Lifts

Employers utilizing aerial lifts have until December 2019 to comply with the updated American National Standards Institute (ANSI) usage standards for safety and training. Released in 2018, these can be found in the ANSI A92.22 Safe Use and A92.24 Training Standards. Anyone qualified under old standards will not be qualified under the new standards until they undergo additional training. One of the central changes resulting from these updates is the definitions of specific equipment. Aerial lifts will now all be referred to as Mobile Elevating Work Platforms, or MEWP's. All MEWP's are further categorized into two classifications, Group A and Group B.

- Group A MEWP's-The center of the work platform does not extend beyond the chassis at any time, such as with scissor lifts.
- Group B MEWP's-The center of the work platform can extend beyond the chassis, as is the case with articulating boom lifts.

These revised standards designate three types of MEWP's within both groups. These include:

- MEWP's that can only travel in the stowed position. These must be moved manually.
- MEWP's that are controlled from the chassis. These can be driven while the platform is elevated.
- MEWPS's that have controls on the work platform. These too may be driven while the platform is elevated.

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Equipment Changes

New MEWP's will require two types of sensors. One alarm sounds and prevents the machine from operating if the load capacity is exceeded. The second is a tilt sensor, which sounds an alarm, and prevents movement of the work platform or chassis if the slope level exceeds safety limits.

Safety Plans

All employers using MEWP's must have a written safety plan. This plan should include:

- A detailed site risk assessment
- Operator rescue plans
- At least one trained supervisor to monitor employee compliance with the new standards
- Steps for preventing unauthorized MEWP use
- Steps for protecting the safety of employees not operating the MEWP

Training Requirements

All personnel who supervise MEWP operators must be trained in these areas:

- Selection of the correct MEWP for work to be performed
- The rules and standards for safe MEWP operations for the work being performed
- Knowledge of potential hazards related to the use of MEWP's
- Knowledge of how to protect against those hazards
- Making sure the operating manual is stored in a protected place on the MEWP

MEWP operators must also provide basic training to other employees that may work on the platform with them. Maintenance employees also require training to repair and maintain MEWP's to manufacturer and ANSI standards.

29 CFR 1926.453 - Aerial lifts is the pertinent OSHA standard. OSHA provides additional resources for aerial lift safety which are available through this link: <https://www.osha.gov/Publications/aerial-lifts-factsheet.html>

The ANSI A92.22-2018 Standards can be purchased at: <https://shop.saiaonline.org>

OSHA's Lockout Tagout Standard - Proposed Changes

OSHA is considering [reopening](#) its lockout/tagout (LOTO) rule, which could impact all occupational safety and health professionals (OSH) and employers in the U.S. The [American Society of Safety Professionals \(ASSP\)](#) and the [American National Standards Institute \(ANSI\)](#) Z244 Committee submitted a very detailed technical comment addressing LOTO and the issues of alternative approaches to LOTO, one of the most detailed technical comment ASSP has ever submitted on a regulatory issue.

The ANSI/ASSP Z244.1 Standard presents requirements for controlling hazardous energy through three different approaches: lockout (the primary approach), tagout and alternative methods. During a webinar on 9/17/19, ASSP reviewed the standard's requirements with focus on the **use of control systems** as used in alternative methods. In addition, they discussed situations that may require alternative methods rather than conventional lockout and reviewed criteria for evaluating alternative methods based on risk assessment and determining their effectiveness.

The LOTO standard currently requires that all hazardous energy from power sources and energy stored in the machine itself be controlled using **energy isolating devices (EIDs)** when an employee is performing servicing or maintenance of a machine or equipment. OSHA's definition of EIDs excludes push buttons, selector switches, and other control circuit type devices.

OSHA recognizes that there have been safety advancements to control circuit type devices since it adopted the standard in 1989.

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Accordingly, OSHA is revisiting the LOTO standard to consider whether to allow the use of control circuit type devices instead of EIDs for some tasks or under certain conditions. They seek information, data, and comments that would help the agency determine under which conditions, if any, control circuit type devices could safely be used. OSHA is also considering changes to the LOTO standard that would reflect new industry best practices and technological advances for hazardous energy control in the robotics industry.

They invite information, data, and comments on these and any other issues or concerns that regulated employers, affected employees, and other interested parties may have regarding the existing LOTO standard. See

<https://www.regulations.gov/document?D=OSHA-2016-0013-0001> and

<https://www.regulations.gov/document?D=OSHA-2016-0013-0049> for additional details.

OSHA Silica Standard Resources

OSHA issued silica standards that became fully effective for both the Construction Industry (29 CFR 1926.1153) and General Industry (29 CFR 1910.1053) last year that set permissible exposure limits (PEL) for respirable crystalline silica in various work settings due to potential lung and kidney disorders. They also established specific Employer program and training compliance requirements.

Respirable crystalline silica can be created from activities involving cutting, sawing, grinding, drilling, sandblasting or crushing stone, rock, concrete, brick, block, and mortar materials.

To assist Employers with compliance OSHA developed a number of tools including guides, Frequently Asked Questions (FAQ), fact sheets and sample training materials (i.e. video's, PowerPoint® presentations).

If you have operations or work tasks that may involve silica these resource materials may be accessed at:

<https://www.osha.gov/dsg/topics/silicacrystalline/index.html>

OSHA cites Food Manufacturer for Machine Safety Violations

In August 2019, OSHA cited Choice Products USA, LLC for continually exposing employees to machine safety hazards at its cookie dough manufacturing facility in Wisconsin. The company faces \$782,526 in penalties, and has been placed in the agency's Severe Violator Enforcement Program (SVEP).

OSHA cited Choice Products for five egregious willful violations for failing to implement and train employees on lockout/tagout procedures to prevent unintentional contact with machine operating parts during service and maintenance. Inspectors also determined that the company failed to install machine guarding, and comply with forklift regulations.

OSHA cited Choice Products for exposing employees to similar machine hazards following an October 2016 inspection. "The company managers developed comprehensive lockout/tagout procedures following the 2016 inspection but failed to implement their own safety program," said OSHA Acting Regional Administrator William Donovan. "Employers are required by law to provide workers with safe and healthful workplaces."

"Worker safety should be an employer's top priority every day they're open for business," OSHA Principal Deputy Assistant Secretary Loren Sweatt said. "Employers who do not comply with safety standards will continue to face the full enforcement of the law."

OSHA offers compliance assistance resources on Safeguarding Equipment and Protecting Employees from Amputations and Control of Hazardous Energy – Lockout/Tagout.

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Respirator Safety Guidance

Choosing the correct respirator to use to protect employees from gases, vapors, and/or particles is critical. The National Institute for Occupational Safety and Health (NIOSH) has issued a guide intended to help employers select appropriate air-purifying respirators (APRs) based on the environment and contaminants at specific jobsites. APRs are used to protect workers by removing gases, vapors, aerosols (airborne droplets and solid particles) or a combination of contaminants from the air by using filters or cartridges. It's important to note that these devices cannot be used in areas that are oxygen-deficient, or where immediate danger to life or health exists.

NIOSH's Respirator Approval Program at the Centers for Disease Control and Prevention (CDC) tests and approves respirators used in occupational settings. To be approved, a respirator must meet the minimum performance requirements defined in Title 42, Part 84 of the Code of Federal Regulations (42 CFR 84). This approval process ensures a minimum level of worker protection from airborne particulates.

Knowing when respirators (and cartridges) should be changed is also very important. OSHA has specific regulatory requirements based on whether or not respirators are used voluntarily by employees. If gas/vapor respirators are required by the employer (regardless of the exposure levels), then a change schedule must be implemented—29 CFR 1910.134(d)(3)(iii). In contrast, if respirator use is voluntary, then cartridge change schedules are not required—29 CFR 1910.134(c)(2). When respirator use is required, employers must establish and implement a written respiratory protection program with worksite-specific procedures and elements for required respirator use. The provisions of the program include procedures for selection, medical evaluation, fit testing, training, use and care of respirators.

Here are a few links on the topic from both CDC/NIOSH and OSHA

<https://www.cdc.gov/niosh/docs/2018-176/>

<https://www.cdc.gov/niosh/docs/2018-176/pdfs/2018-176.pdf?id=10.26616/NIOSH PUB2018176>

OSHA's Respirator Protection E-Tool and other resources

https://www.osha.gov/SLTC/etools/respiratory/change_schedule_manufrecommendation.html

<https://www.osha.gov/Publications/OSHA3079/osh a3079.html>

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