**Paint Booth Cleaning: It's the Law, but It Can Save You Money**

In today's blog, we'll explore the case for paint booth cleaning. Although it’s regulated, it can save your company a lot of money.

**Cleaning is the Law**

There are a number of regulations and standards which include paint booth cleaning and maintenance as part of their compliance directives. Most of these are to protect the workers inside the booth, workers outside of the booth and the environment. Some of these include:

* OSHA 1910.107 and 1910.94
* EPA NESHAP, 40 CFR Part 63 Subparts HHHHHH and XXXXXX
* NFPA 33

**Cleaning SAVES Money**

iSi has been providing paint booth cleaning personnel for a number of years to industrial facilities. One of the biggest comments we get from our clients in favor of routine cleaning is how much a clean booth will affect the quality of the painted part. A clean booth significantly reduces the amount of dirt and impurities in the air, leading to a dramatic reduction in the number of re-paints. This in turn saves painter time and resources, increases productivity, and improves the overall quality of the finished product.

Dirty booths can make a big difference on booth effectiveness. Built-up coatings on floors and walls become harder and harder to remove as time goes on. Filters which are dirty, not changed routinely, paint-coated, missing, or not sized properly for the type of booth they’re in all contribute to poor booth performance. Coated sprinkler heads and fire devices are a fire safety hazard. These issues can end up costing your company in additional cleaning labor costs, equipment replacement costs, safety hazard considerations and product repaints.

**What Should be Cleaned?**

Booths walls and floors, paint grates, sprinkler heads, filters, gauges, ventilation ductwork and fan blades should all get routine attention. For safety reasons, gauges should shut down if there’s not enough flow through the filters. Paint scraps should never be left in piles on the floor, and drums of rags and wastes should be removed each day. OSHA says that in some cases, daily cleaning may be needed.

**Who Cleans the Booth?**

What hazards are involved in the paint that you’re using? If the paint is hazardous, this puts you in a totally different level of effort than a traditional janitorial or maintenance company may be able to provide. For example, iSi conducts cleaning of booths contaminated by hexavalent chromium paints. This requires our workers to wear special PPE and respirators and follow strict protocols. As a company, iSi is required to have a respirator program, a hexavalent chromium program, and routine medical monitoring.

Some companies will have their painters do the cleaning either before or after a shift. This takes extra time away from their regular duties, and sometimes lack of time and shifting priorities can create shortcuts. Thus, companies end up paying for maintenance duties at skilled painter labor rates. What is the best use of time for your personnel?

If you have questions or comments about paint booth maintenance, contact us today, and we’d love to help you!

We’ve all said or heard them before. Classic sayings like: “It’s a scorcher out there!” or “It’s hot enough to fry an egg on the sidewalk!” or “It’s so hot, my sweat is sweating!”. Hot weather conditions, like the sayings, are typically inevitable, especially for those who work outside. Multiple meteorological factors play into hot weather extremes and how they make you feel when you’re outside. These factors can be easily monitored using a computer, phone application, radio, or television.

Meteorologists at the National Weather Service (NWS) will issue an official alert if necessary, based on meteorological data. If no alerts are issued by the NWS, hazards may still exist for your job. Various outdoor professions like builders, concrete masons, landscapers, and firefighters all work outdoors and have different duties in diverse settings. Some professions regularly utilize equipment that can produce a significant amount of heat. Although professions vary, all are impacted by the same meteorological factors that can create hazardous conditions during hot weather. These hazardous conditions primarily include the meteorological factors of temperature and relative humidity.

When dealing with weather, like many sciences, aspects are complex and can get complicated quickly. There’s no reason these aspects can’t be simplified. Instead of using loads of esoteric meteorological jargon like *hydrostatic equilibrium* that serves little-to-no use in average daily conversations, let’s simply review a few terms before we go any further. It’s always good to learn something new, right?

**Relative Humidity** is a ratio of the amount of moisture in the air compared to the maximum amount of moisture air could have, expressed as a percentage. It is not a measure of actual moisture in the air.

**Temperature** is a measurement of the average kinetic energy of molecules in an object. It’s used to measure the amount of heat an object has.

**Heat** is the amount of energy within an object and is transferred between objects in response to differences in temperature. Energy always transitions from a warmer object to a colder object. Heat transfer occurs in three ways:

* Conduction – Molecules coming in contact (or colliding) with each other.
  + Hot ground heats up objects it encounters (rocks, air, etc.).
  + Touching a hot handle of a boiling pot of water.
* Convection – Molecules with varying energy levels (temperatures) are mixed and eventually balance at the same energy level (temperature). Typically occurs within liquids or gases.
  + Warm air rises up in the atmosphere, cools, and then turns into a cloud.
  + Putting a mixture of cold and warm water into a pot to boil.
* Radiation – Molecules are exposed to a high level of electromagnetic waves.
  + Rays from the sun increase the heat of the ground.
  + Heat from a stovetop burner increases the heat of a pot of water.

You get into your car on a hot summer day. You burn your hand on the hot steering wheel (conduction) that is hot due to the sun’s rays coming through the windshield (radiation) and even though your drink from lunch wasn’t in the sun, it’s no longer cold due to the ice melting in your cup (convection).

As heat intensifies due to various heat transfer methods, the air temperature rises. High temperatures are harsh and increase our body temperature. In order to regulate body temperature and rid ourselves of heat, we sweat and that sweat evaporates. When there’s a breeze in the air, the wind will evaporate our sweat quicker. When you include an elevated level of relative humidity during high temperatures, the air feels heavy which also makes it more difficult to evaporate sweat and regulate body temperature. Relative humidity is a value that varies based on temperature and moisture content in the air and can fluctuate throughout the day, just as temperature can. For example, if the air temperature is 85°F, having a relative humidity of 30% feels completely different than a relative humidity of 80%. The NWS created a chart to assist in reviewing various temperature and relative humidity combinations.

The [NWS Heat Index chart](https://www.weather.gov/safety/heat-index) is a useful tool. It’s an easy-to-read chart depicting the heat index level at a certain temperature with a specific level of relative humidity. This chart considers light winds and some cloud cover. However, since that’s not always a realistic scenario depending on your location, a note states that full sun exposure with very few clouds can increase heat index values by up to 15°F. Another helpful tool to use is the [Heat Safety Tool](https://www.osha.gov/SLTC/heatillness/heat_index/heat_app.html) application for smartphones which calculates the heat index either based on your location or specific data you enter. This application was jointly created by several regulatory agencies including OSHA, NIOSH, and the CDC. Keeping track of weather conditions is crucial when making decisions.

What is the heat index? Everyone has more than likely heard of it, especially if you work outside. This is a calculated value that tells us how it really feels at certain temperature and relative humidity values. It’s sometimes described as the “apparent temperature”. There are four risk levels associated with the various heat index values: Lower (<91°F), Moderate (91°F – 103°F), High (103°F – 115°F), and Very High to Extreme (>115°F). A higher risk level means more measures need to be taken to protect your team. OSHA has a practical [website](https://www.osha.gov/SLTC/heatillness/heat_index/) dedicated to heat index. The website includes handy resources and checklists you can review regardless if you’re an employer or part of a working team. While you can’t control the weather, you can make simple decisions that play a major role in how you feel physically when working outside, such as what clothes to wear.

Regulating body temperature is imperative to keeping cool, pun intended. As we all know when our body gets hot, we sweat. What keeps us cool while we’re sweating is when our sweat evaporates. Different clothing material can assist in regulating body temperature by absorbing and evaporating sweat. Cotton is common, absorbs moisture well, and is lightweight when dry. Synthetic moisture-wicking fabric absorbs and evaporates moisture quickly and is also lightweight. Surprisingly, even wool material is beneficial due to its fiber makeup. As wool absorbs moisture it’s evenly distributed throughout the material and eventually evaporates, but always feels dry to the touch. This is not an endorsement for a particular fabric, as each of these have good and bad qualities. Every person who works outside has their own theory on what works best for their job. If you have something that works well for your particular industry, let us know so we can share that information with others.

Along with clothing, personal risk factors are important to consider during extreme heat. This includes any underlying health conditions, age, and physical fitness. Every person is different and their tolerance could be higher or lower based on their personal risk factors. Don’t push yourself or others if conditions are near extreme. Supervisors should insist on frequent breaks in the shade during hot days for the entire team. While some people may not feel the need to take frequent breaks, they are beneficial for your body and help in regulating body temperature. It’s vital to notice if someone on your team needs a break and is close to requiring medical attention due to heat illness.

Hot working conditions can bring increased risks of heat illness, especially when heat-producing equipment is used. The most important thing to remember about a person suffering from heat illness is to get them out of the heat ASAP. Take them to a shaded or air-conditioned area. A running vehicle with air conditioning works if no shaded area is available. Always stay with a victim of heat illness until medical personnel arrive. Be aware of yourself and your team for any symptoms and take the appropriate action immediately.

**Heat rash** can appear on skin as small or large clusters of red bumps.

* What to do:
  + Get to a cool, dry place.
  + Keep rash dry; use powder to soothe.

**Heat cramps** bring pain or spasms to muscles.

* What to do:
  + Halt physical activity until cramps go away.
  + Get to a cool place.
  + Drink water or electrolyte drink.
* Seek medical attention if the victim:
  + Has cramps lasting longer than 1 hour.
  + Has heart problems.
  + Is on a low-sodium diet.

**Heat exhaustion** occurs when the body’s temperature can’t cool down. Think of this as a situation where extreme conditions *exhaust* the body. It is severe and can occur in one day or over multiple days when in a consistently hot environment.

* Watch for:
  + Heavy sweating
  + Cold, clammy, pale skin
  + Fast and weak pulse
  + Nausea or vomiting
  + Headache
  + Weakness or tiredness
  + Dizziness
  + Fainting
  + Muscle cramps
* What to do:
  + Get to a cool place.
  + Loosen clothing.
  + Sip water; do not chug.
  + Place cool cloths or cold packs under arms or on neck.
* Seek medical attention if the victim:
  + Is vomiting.
  + Experiences worsening symptoms.
  + Experiences symptoms lasting longer than 1 hour.

**Heat stroke** occurs when body temperature is excessively high. Think of this as a situation that causes the body to *stroke* or seize up completely. This is a serious medical emergency that can cause shock, brain damage, organ failure, and death. It could be caused by heat exhaustion that was not properly treated.

* Watch for:
  + Red, hot, dry skin (no sweating)
  + Fast and strong pulse
  + Nausea
  + Throbbing headache
  + High body temperature
  + Dizziness or confusion
  + Slurred speech
  + Losing consciousness
  + Seizures
* What to do:
  + Call 911 – follow their advice.
  + Get to a cool place.
  + Loosen clothing.
  + Place cool cloths or cold packs under arms or on neck.
  + Do not provide anything to drink.

Dehydration can be a common cause of heat illness. Maintaining hydration is important, even if you don’t feel thirsty. Drinking water or electrolyte drinks are highly preferred to sugary and heavily caffeinated drinks. OSHA recommends drinking small amounts of cool water often before getting thirsty; 4 cups every hour during heat index values between 103°F – 115°F. Another recommendation is not to exceed 12 quarts of water per day.

An important reminder is that every person and situation is different. Some people require more water than others. These intake amounts depend on several things including the type of work being done, how much you’re sweating, and your personal risk factors. Don’t chug a large amount of water in the morning and call it good for the day; the important thing is *maintaining* hydration. You don’t flood your vegetable garden once at the beginning of the month and neglect it the rest of the month. If you do, you probably don’t have much of a harvest.

It’s the supervisor’s duty to have a plan in place during days of extreme heat. If possible, rescheduling a job to a cooler day or even a cooler part of the day could make a difference. Getting a job done on time is important, as is maintaining client satisfaction. However, no part of a job is worth risking the health and safety of your team and clients should understand that.

It’s every person’s duty to watch out for themselves and their teammates. Providing cold water for your team is beneficial during hot days, as is having a first aid kit. If you have a first aid kit, kudos! If you don’t have a first aid kit, now is the time to get one. A few beneficial items to add to your first aid kit would be cold packs, cooling towels, electrolyte/salt tablets, or electrolyte powder drink mix. There are also specific first aid kits that can be purchased that include heat-stress care items.

If you’re a supervisor who would like some ideas on a heat safety plan or have questions on where to find quality first aid kits, contact iSi.

Winter. Just the word is enough to bring tremors to some. Bone-chilling cold air, bitter winds that take your breath away, and the always-frustrating winter precipitation. Regardless of where you live, winter is a colder time of year; that we can all agree on. Winters are vastly different in Kansas, Arizona, and New York. Areas around the country are used to diverse definitions of cold. What all areas have in common are the same meteorological factors that play into the cold weather. Before heading out for the day, you can check the weather almost anywhere; television, computer, smartphone application, or the radio.

Meteorologists at the National Weather Service (NWS) will issue an official alert if necessary, based on meteorological data. Even if no alerts are issued, hazards could still exist for your job. Outdoor jobs vary in many ways and can expose workers to hazardous conditions on a typical day. Once the weather is factored in, extra precautions must be taken. When a body gets exposed to cold, its exterior temperature starts to decline followed quickly by its interior temperature. Keeping track of weather conditions, especially temperature and wind, is imperative when working outside.

As mentioned in the blog entry about Heat Stress, heat is the amount of energy an object has. The transfer of heat when two objects come into contact with each other depends on the temperature, or measurement of energy, of both objects. The larger the difference in temperature, the quicker the heat will flow. Think of how warm you get immediately after you put on a hot shirt fresh out of the dryer. Heat will always transition from a warmer object to a colder object to balance a temperature difference, if one exists. This explains why heat is lost, or drawn out, from your body during the cold.

Both temperature and wind are equally important factors during cold weather. Frigid temperatures can be more bearable if the wind is calm, under 3 mph. When the wind picks up, especially out of the north, our body heat can be lost quicker. The temperature could be teetering around freezing (32°F) and if a strong northerly wind moves in, it could send temperatures plummeting; thus, increasing the risk for cold stress. If precipitation is involved, temperature and wind can be crucial in making the difference between rain, freezing rain, and snow. The NWS created a chart to easily review wind chill factor during certain outdoor conditions.

The [NWS Wind Chill chart](https://www.weather.gov/safety/cold-wind-chill-chart) is useful to review as a guide to cold weather. It depicts the wind chill value at a certain temperature with a specific wind speed. These calculations are based on a typical height of 5 feet, which is an average height for an adult human face. If you’re tall with your face higher than 5 feet and you go outside without face protection, this chart may not provide exact data for your situation. This chart can be beneficial, but we need to understand what wind chill actually is.

Wind chill describes the rate that body heat is lost due to a combination of low temperatures and wind speed. It’s sometimes described as the “feels like” temperature. While it’s a useful tool to predict the rate at which exposed skin loses heat and is more prone to frostbite risk; it has a high degree of variability. Earlier in this post, I mentioned how different geographical areas have different definitions of cold. If a person has acclimated to frigid temperatures where they live, they are likely able to withstand colder temperatures better than a visitor from a warmer place. Since temperature can vary quite a bit during the day, just as the wind can, wind chill values can change frequently. Wind chill doesn’t take into consideration impact from sunlight. Adding the sun’s impact can assist in keeping the body warm due to solar radiation. These values can also vary depending on your location and whether you’re walking in the sun or in the shade. These aspects are all important when considering wind chill.

Let’s make something clear. Wind chill is not the actual air temperature combined with the wind, nor will exposed skin’s temperature decrease to the wind chill value. An object can only cool to the temperature within its environment, due to a heat imbalance as mentioned above. Take water for example. If water is placed in a cup outside where the air temperature is 32°F and the wind chill is 5°F, the temperature of both the cup and the water inside will cool down to 32°F. If you place hot water in a cup outside in the same conditions, it will freeze quicker but still will only reach 32°F. (As an aside, this is why I fill my ice cube trays with hot water, to get ice quicker!) This may seem complicated, but the bottom line is that if you don’t dress warm in cold weather, your body heat won’t last long. There are many variables to consider when dressing for cold weather.

Keeping ourselves warm has a lot to do with the clothes we wear. Two words to live by in cold weather: Layer up! Multiple layers allow for heat to stay in and cold to stay out. Having the ability to remove a layer, if you’re sweating too much, is also beneficial. A base layer will absorb your sweat and evaporate it into the next layer without losing body heat. Multiple insulating layers will keep your body heat in while moisture is able to escape. Your outer layer should ideally be waterproof and will deflect the cold air, biting winds, and precipitation. This goes for the upper and lower parts of your body; hands, feet, and head included. A significant amount of body heat is lost through a person’s head, regardless of how much hair they have. During the frigid winter, dressing for warmth can easily mean wearing a balaclava (ski mask), a stocking cap, 4 shirts, 2 pairs of pants, 2 pairs of socks, a pair of gloves, and a pair of mittens as well as some coveralls and a coat. Just like in a severe weather situation, put as many barriers as possible between you and the elements. Quality is just as important as quantity when it comes to winterwear.

One type of material that will do no favors in the cold is cotton. Once it gets wet, the moisture won’t go away anytime soon causing body heat to be lost quicker. Instead, opt for wool or fleece. Moisture-wicking fabric will absorb and evaporate moisture fast, which is ideal for a base layer so the sweat you generated is removed but not your body heat. Wool material is helpful due to its fiber makeup because moisture is evenly distributed throughout the material and evaporates, but always feels dry. Fleece is a great insulator and will help maintain your body heat. Every person who works outside has their own theory on what works best for their job. If you have something that works well for your particular industry, let us know so we can share that information with others.

In addition to wearing the right type and amount of clothing, personal risk factors play a vital role when working outside. Personal risk factors include physical fitness, age, and underlying health conditions such as diabetes or hypertension. Every person’s tolerance is different and can vary based on their own personal risk factors. When conditions are borderline extreme, don’t push yourself or your teammates too hard. Frequent breaks in a warm area for the entire team should be a standard practice for supervisors. Even though not everyone will feel the need to take breaks, it is crucial to observe if someone from your team is nearing a medical emergency due to cold stress.

Extreme cold working conditions can bring increased risks of cold stress. Continued exposure to wet or damp conditions during exhaustive outside work in cold weather will only exacerbate the body’s reaction. Cold stress on the body can result in severe health problems, and in some cases can cause death. Removing a person from the cold when they’re suffering from cold stress is critical. Take the person to a warm place, even if it’s a running vehicle with the heater going. Always stay with a victim of cold stress until medical personnel arrive. Be aware of yourself and your team for any symptoms and take the appropriate action immediately.

**Trench Foot** or **Immersion** can occur on feet that are exposed to wet and cold conditions for an extended period of time. Wet feet can lose heat quicker than dry feet. This is a non-freezing injury that can occur in temperatures up to 60°F if feet are consistently wet.

* What to watch for:
  + Reddening skin
  + Tingling or pain
  + Swelling
  + Leg cramps
  + Numbness
  + Blisters
* What to do:
  + Remove wet shoes and socks.
  + Dry wet feet.
  + Elevate feet and avoid walking.
  + If serious, call 911 and seek medical attention.

**Frostbite** is caused by freezing of exposed skin and is a medical emergency. It can cause permanent damage and may require amputation in severe cases. People who are not dressed properly for extreme cold are most at risk, along with people with reduced blood circulation.

* What to watch for:
  + Red skin developing gray or white patches
  + Blisters
  + Tingling or aching skin
  + Loss of feeling
* What to do:
  + Call 911 – follow their advice.
  + Protect the affected area by wrapping loosely with dry cloth.
  + Provide a warm drink if the person is conscious.
  + Leave affected area alone; do not rub or break skin or attempt to heat.

**Hypothermia** is a serious medical emergency. It takes place when the body’s heat is lost faster than it can be replaced. Body temperature falls below 95°F and can impact the brain, making a victim unaware of what’s happening. This can also occur at temperatures above 40°F if a person gets cold from sweat, being submerged in cold water, or precipitation.

* What to watch for:
  + Shivering
  + Fumbling hands
  + Confusion or memory loss
  + Exhaustion
  + Drowsiness
  + Slurred speech
* What to do:
  + Call 911 – follow their advice.
  + Get to a shelter or warm place.
  + Remove wet clothing.
  + Warm the body with dry blankets around chest, neck, or head – do not cover face.
  + Provide a warm drink if the person is conscious.

Maintaining hydration is important, even if you don’t feel thirsty. Exerting yourself outside during cold conditions can cause dehydration and exhaustion because your body is working harder to maintain its temperature while performing work duties. Drinking warm drinks in addition to water and electrolyte drinks will aid in maintaining body heat and hydration. If possible, rescheduling a job to a safer and warmer time can make a difference. Getting a job done on time is important, as is maintaining client satisfaction. However, no part of a job is worth risking the health and safety of your team.

It’s the supervisor’s duty to have a cold weather plan. Frequent breaks in a dry, warm location allow for the body to warm back up once it’s been exposed to extreme cold. If possible, provide heaters or hand/foot warmers for your teams working outside. Even creating some type of stable block from the wind can make a significant difference. Working in pairs will allow for everyone to watch out for their teammates for signs of cold stress. Having an extra pair of gloves, socks, or a hat stored in your vehicle may come in handy.

Providing water for your team is helpful, as is having a first aid kit. If you have a first aid kit, great job! If you don’t, now is the time to get one. A few beneficial items to add to your first aid kit would be hand/foot warmers, towels, blankets, or electrolyte powder drink mix.

If you’re a supervisor who would like some ideas on a cold safety plan or have questions on where to find quality first aid kits, contact iSi.

**Ototoxic – When Chemicals, Yes Chemicals, Can Cause Hearing Loss**

The effects of chemical exposures in the workplace has been highly documented. Chemicals can affect you when you breathe them in, ingest them, inject them or have them come in contact with your skin. However, did you know that chemicals can cause hearing loss too?

Chemicals which can contribute to hearing loss are called “ototoxicants” and the hearing loss itself is considered to be “ototoxicity.” Ototoxic chemicals reach the inner ear, connected pathways and nerve fibers through the blood stream or through the ear’s hair cells. Hearing losses can range from sound distortion to inability to detect two sounds with similar frequencies to inabilities to detect time gaps between sounds or localize sound.

The problem increases when there is a noise issue combined with the exposure an ototoxicant. Ototoxic chemicals make a bigger impact on noise exposure, especially impulse noise. Ototoxic chemicals plus noise becomes worse than the noise alone or the chemical alone. The noise levels do not even need to be above OSHA’s Permissible Exposure Limit (PEL) standards. It’s the combination of the two which causes the greatest damage.

**Which Chemicals Are Considered Ototoxicants?**

* Pharmaceuticals: aspirin, some antibiotics, NSAIDs, loop diuretics
* Tobacco smoke
* Solvents, degreasers and paints containing toluene, p-xylene, styrene, ethylbenzene, methylstyrene, trichlorethylene, carbon disulfide, n-propylbenzene or n-hexane
* Carbon monoxide
* Hydrogen cyanide
* Nitriles: 3-butenenitrile, cis-2-pentenenitrile, acrylonitrile, cis-crotononitrile and 3,3’-iminodipropionitrile
* Metals and compounds: mercury, lead, organic tin and germanium dioxide
* Pesticides: pyrethroids, hexachlorobenzene, insecticides or organophosphates
* Some limited research has also speculated arsenic, cadmium, halogenated hydrocarbons, bromates, alkylic compounds and manganese may also affect ototoxicity

**Which Industries or Operations May be Affected?**

* Manufacturing
* Construction
* Printing
* Painting
* Fueling vehicles and aircrafts
* Firefighting
* Weapons firing (Military)
* Pesticide spraying

**How Do You Test for Otoxicity?**

Determining whether you have the potential for this condition is primary. First, conduct a risk assessment to determine if your operations could be affected.

Check the Toxological Information section of the chemical’s Safety Data Sheet (SDS Section 11) to see if the chemical is considered a neurotoxicant. If there is nothing listed in this section, often other clues can be found in the SDS such as general toxicity, nephrotoxicity or if the chemical produces reactive free radicals.

From there, exposure limits and thresholds are dependent on different factors such as the chemical itself, exposure routes, concentration, duration, noise exposure and individual risk factors such as age. Workplace sampling will be able to help you quantify your exposures.

Audiogram tests can show early onset of hearing impairments and threshold shifts. However, they cannot tell you the difference between whether the impairment is noise-related or ototoxic-related. If you have complaints of hearing loss, investigate whether ototoxicity could be a factor.

The American Conference of Governmental Industrial Hygienists (ACGIH) recommends periodic audiograms for those who have noise exposures combined with carbon monoxide, hydrogen cyanide lead and solvent mixtures. When there’s not a noise exposure, ACGIH still recommends audiograms be used when workers have the potential to be exposed to ethylbenzene, styrene, toluene or xylene.

**PPE and Training Requirements**

Make sure you reduce the effects of ototoxic chemicals in your workplace either through controls such as isolation, limiting exposures, or eliminating unnecessary tasks, or through the use of PPE. Conduct your PPE assessment per OSHA rules. You may need to include proper hearing protection, as well as PPE which can prevent inhalation such as respirators, or absorption through the skin such as chemical protective gloves, arm sleeves, and aprons.

If you have a potential for ototoxic chemical exposure, this needs to be included in your Hazard Communication (HAZCOM) training.

**Does This Affect You?**

Do you have the potential for ototoxicity in your workplace? iSi can help you make that determination, conduct your risk assessment, and/or quantify your exposures through sampling. Contact us today!

**8 Key Details You Need to Know About OSHA’s Vaccination and Testing Standard**

OSHA's recently announced Emergency Temporary Standard (ETS) on vaccination and testing was issued on November 5, 2021, and within days it was stayed by 5th U.S. Circuit Court of Appeals. While the legality of the standard, aka 29 CFR 1910.501, remains in question, it would still be a good idea for your business to become familiar with the standard's requirements, in the event it is allowed to continue.

Here are 8 key details of the standard you need to know:

**1. 100 Employees Requirement**

The ETS applies to companies with 100 or more employees. This counts 100 employees at the enterprise level, but only U.S. employees. The number is based on heads, not equivalent hours. The host employer does NOT count temporary worker hours (this goes on staffing agencies’ head counts).  Determining head count starts at worker start dates of November 5, 2021 and later. If you reach 100 employees at any one time, your company will fall under the requirements throughout the life of the ETS (which is supposed to end on May 4, 2022).

**2. Determining Vaccination Status**

Employers must determine the vaccination status of every employee. Employers must also maintain current knowledge of the aggregate number of fully vaccinated employees and total number of employees at the workplace. If requested by OSHA or an employee, this information must be made available within 4 hours.

**3. Testing**

If you decide not to require vaccines for all employees, the standard allows unvaccinated employees to do weekly testing. Employers are not responsible for the costs of testing.

There is a hard 7-day limit in testing. That is, the employer must have a copy of a new COVID test result on 7th day. The employee cannot come to work on the 8th day without a test result.

Pool testing for weekly testing will be allowed. This means you can collect the same type of specimen from several people and conduct one antigen laboratory test on the combined pool of specimens (e.g., four samples may be tested together, using only the resources needed for a single test). If pooling procedures are used and a pooled test result comes back negative, then all the specimens can be presumed negative with the single test. If results come back positive, additional testing per employee to determine which one in the pool is the positive one would be required. Pool testing would reduce testing costs and results time.

**4. Rules for the Unvaccinated**

There is no more 6-foot distance rule when it comes to masking. All unvaccinated workers would be required to wear masks. They could only remove masks when they are alone in a closed room with the doors closed, when eating/drinking, when wearing a respirator, for identification purposes (security ID), when their job duties require seeing their mouth or when a face covering would present a serious injury or death. Unvaccinated workers who become close contacts would no longer have to be removed from the workplace.

**5. Written Policy**

Employers must have written policy in place that covers either mandatory vaccinations or a vaccination/testing option.

**6. Training/Informing Workers About the ETS**

Employers need to provide certain information to employees about the ETS and any method of information is acceptable as long as it includes the following information:

* Information about the ETS
* Employer policies/procedures
* Vaccine information by providing the specific document “Key Things to Know About COVID-19 Vaccines”
* Multiple sections of the OSH Act which protects against discrimination, reporting injuries/illnesses, retaliation, and about criminal penalties associated with knowingly supplying false information.

**7. Recordkeeping**

Vaccine and weekly testing records will be considered medical records which need to be maintained in a confidential manner. However, unlike other OSHA medical record requirements, vaccine and weekly testing records would only need to be maintained for the life of ETS.

**8. Compliance Date**

At the moment, the compliance date is December 6, 2021 for all provisions except weekly testing. The compliance date for weekly COVID testing is January 4, 2022.

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iSi will be monitoring developments with federal OSHA ETS and will update this article, or provide additional information in our blog as information continues to develop.

**OSHA Updates 14 Standards**

As part of the President’s Executive Order for agencies to improve regulations and conduct regulatory reviews, OSHA has been working on reviewing their standards to remove outdated, duplicative, and inconsistent parts of their standards. The latest round of reviews and updates, called Standards Improvement Project – Phase IV, will go into effect on July 15, 2019 and it updates 14 different OSHA standards at a projected $6.1 million/year savings.

Changes range from clarifications and deletions, to updates for current technology, to good news for cats.

**Social Security Numbers**

29 CFR Parts 1910, 1915, 1926

OSHA is eliminating the requirement to collect worker social security numbers in 19 of its standards. Any social security numbers already collected on previous forms can remain on those forms, and if employers want to continue to collect numbers, they may do so.

**Medical Services and First Aid**

29 CFR 1926.50

Current standards require posting of physician, hospital and ambulance phone numbers where 911 service is not available. At the time, 911 was a relatively new concept, but many of today’s 911 services for landlines can pinpoint the caller’s location. If your area has landline auto-location for 911, you no longer have to post the additional information.

However, the auto-location feature isn’t always available for cell phones in remote locations. The new rule requires employers, in areas where 911 auto-location for wireless phones is not available, to post the latitude and longitude of the current location in a conspicuous place so that emergency services may locate the worksite. Employers are also to ensure that the communication system they are relying on to use to report an emergency is working and is effective.

**Medical Surveillance Requirements**

29 CFR part 1910, subpart Z

Employers will no longer be required to conduct periodic chest x-rays of their employees for lung cancer purposes. This is a requirement in asbestos, cadmium, coke emissions, inorganic arsenic, and acrylonitrile standards. Medical data has been found that periodic x-rays don’t make much of a difference in reducing lung cancer. However, periodic x-rays are still required for asbestosis determinations, and initial baseline x-rays are still required as well. Digital radiographs will be allowed as well as different sizes of x-ray films.

**Occupational Hearing Loss**

29 CFR 1904.10

The recordkeeping rule now clarifies physicians must use the standards of 29 CFR 1904.05 to make the determination if a hearing loss is work-related. Previously, employers have been able to not record hearing loss as an injury when a physician determines the loss was NOT work related, but no guidance was given for physicians in that determination. A cross-reference from 1904.05 will be added to 1904.10 to help make that determination.

**Cotton Dust**

29 CFR 1910.1043

The technology of pulmonary function testing has come a long way since 1978, so OSHA will be updating the pulmonary function testing guidelines.

**Lifelines**

29 CFR 1926.104

OSHA is changing the minimum breaking strength of lifelines from 5,400 lbs. to 5,000 lbs. to align with the most recent ANSI/ASSE standards.

**Process Safety Management (PSM)**

29 CFR 1926.64

Rather than having a separate PSM standard for construction, this standard will now reference the general industry standard 1910.119.

**Coke Oven Emissions**

29 CFR 1926.1129

OSHA has determined coke oven emissions does pertain to construction work, and will be deleting the standard. Any construction worker exposures to coke oven emissions will fall under the General Duty Clause.

**Signs, Signals and Barriers**

29 CFR 1926, Subpart G

Employers will now be required to comply with the 2009 version of the Manual on Uniform Traffic Control Devices to better align with DOT’s requirements. OSHA feels the newest version adds better safety controls including requiring high visibility safety apparel, stop/slow signage (not just hand signals), the use of automated flagger assistance devices, and crashworthy temporary traffic barriers and lane channelization. Confusing language will be removed from the traffic signs section, and the barricades and definitions sections will be deleted because they’re duplicates.

**Materials Handling and Storage**

29 CFR 1926.250

Currently, posting of maximum safe load limits of floors in storage areas is required. However, in residential buildings, heavy materials are not placed in areas above floor or slab on grade. Thus, this requirement no longer applies to construction of “single-family residential structures and wood-framed multi-family residential structures.”

**Underground Construction**

29 CFR 1926.800

Mobile diesel-powered equipment used in “other than gassy operations” must now meet the most current MSHA requirements of 30 CFR Part 7, Subpart E.

**Occupational Health and Environmental Controls, Gases, Vapors, Fumes, Dusts and Mists**

29 CFR 1926.55

“Threshold limit values” will change to “permissible exposure limits” and references to ACGIH standards will be removed. OSHA is also cleaning up phrases such as “shall be avoided”, deleting the terms “inhalation, ingestion, skin absorption, or contact”, will change Appendix A to Tables 1 and 2, and will correct inconsistent and errant table headings, footnotes, cross references and asterisks.

**Shipyards**

29 CFR 1915.80

Feral cats will no longer be considered vermin and thus, no longer a health and safety hazard.

**Rollover Protective Structures, Overhead Protection**

29 CFR 1926, Subpart W

OSHA is removing test procedures and performance requirements and replacing them with the current standards of ISO 3471: 2008, and will be making some other technical error revisions.

For more details about each change, [read the Federal Register notice here](https://www.federalregister.gov/documents/2019/05/14/2019-07902/standards-improvement-project-phase-iv).

**OSHA Update:  New Recordkeeping Date; Cranes Compliance News**

We have a couple of OSHA updates today, one regarding electronic recordkeeping and the other for crane compliance.

First, OSHA has proposed a new date for electronic recordkeeping.  The original date had been postponed until July 1, then OSHA issued a statement which for all purposes said “we’ll let you know.”  Now the deadline has been proposed for December 1, 2017.  This new date would still allow for a four-month window to get your records in.  However, no method for submitting has been announced.  We’ll keep you posted on these developments.

In the areas of cranes, there has been movement on a couple of items.

The crane operator certification deadline has been continuously delayed since the rule became law in 2010.  The most recent compliance certification was by November 10 this year.  However, OSHA is proposing to move this date once again.  They haven’t issued an official date, but it’s thought to be November 10, 2018.

Also, OSHA has announced a change to its enforcement policy for monorail hoists.  Monorail hoists are often used to place storage tanks for propane and oil, engines, commercial generators, precast concrete components such as septic systems and vaults, electrical transformers, temporary storage units, and other components.

Until recently, monorail hoists were enforced under the Cranes and Derricks in Construction standard.  OSHA, along with a number of stakeholders, realized that while still a safety issue, these hoists did not operate in the same way other equipment enforced under this standard did.

Until a better option can be found, OSHA will not be enforcing the crane standard when it comes to these devices as long as your company…

* Complies with 1926.554 Overhead Hoists for Construction or the General Duty Clause for General Industry;
* Trains operators to safely use them;
* Makes determinations that each operator is qualified to safely use them per 1926.20, General Safety and Health Provisions; and,
* Follows the OSHA construction standards applicable to each vehicle or support system when your monorail hoists are mounted to work vehicles, utility trailers, scaffolding systems, or other mobile or stationary supports.

More info on the monorail hoists enforcement can be found here (<https://www.osha.gov/doc/MonorailHoistsEnforcementPolicies.pdf>

**5 Ways OSHA’s Top 10 Can Make Your Safety Job Easier**

*Getting Value Out of the “Same Ol’ List”*

The yearly announcement of OSHA’s Top 10 violations came out. So what! The top 5 violations have not changed in 4 years and most of the time it’s the same violations with the order switched around. The only “exciting” part is to see if a newcomer violation got on list. Well as un-newsworthy as this is, the annual confirmation can actually make your job easier.

**What’s on the List?**

Below is a list of the Top 10 OSHA Violations for 2018 (*through September 30, 2018*)

1. Fall Protection – General Requirements (1926.501): 7,270 violations
2. Hazard Communication (1910.1200): 4,552
3. Scaffolding (1926.451): 3,336
4. Respiratory Protection (1910.134): 3,118
5. Lockout/Tagout (1910.147): 2,944
6. Ladders (1926.1053): 2,812
7. Powered Industrial Trucks (1910.178): 2,294
8. Fall Protection – Training Requirements (1926.503): 1,982
9. Machine Guarding (1910.212): 1,972
10. Eye and Face Protection (1926.102): 1,536 (2018 list newcomer)

**It’s the Top 10 for a Reason**

First, companies continue to have problems with these issues. Many of them can be affected by employee behaviors such as how they choose to wear (or not wear) their PPE, conducting (or not) inspections, using (or not) injury saving controls, and situational awareness pitfalls. As a result, some of these are going to be easier to come across on any given day.

Next, these top 10 may also be considered the low hanging fruit of inspections. If these are the most common violations, then you could surmise inspectors are going to be looking at these. Further proof comes from OSHA’s national, regional and local emphasis programs. Emphasis programs allow an inspector to add to their investigation. For example, if you are having an inspection related to an employee complaint for respirators and there is an emphasis program in your area for powered industrial vehicles, OSHA inspectors can broaden their inspection if they see a forklift in your building.

A check of OSHA’s current emphasis programs includes items from the top 10. Out of 10 OSHA regions, there are emphasis programs for:

* Amputations (including machine guarding) – All 10 regions (national emphasis)
* Falls – 6 regions
* Powered Industrial Vehicles – 5 regions
* Electrical (including lockout/tagout) – 2 regions
* Overall Construction Worksites – 4 regions
* “High Health Hazard Top 50” – 2 regions

**Make Your Job Easier Tip 1: Break it Down**

The top 10 have specific standard references with them and from there we can see it’s a mix of general industry and construction standards. All 10 areas of safety are important. However, if you break the list down by the standard your company typically operates under, your focus areas are nearly cut in half and this becomes much more manageable.

|  |  |
| --- | --- |
| General Industry-Related Violations | Construction Industry-Related Violations |
| Hazard Communication | Fall Protection – General Requirements |
| Respiratory Protection | Fall Protection – Training |
| Lockout-Tagout | Scaffolding |
| Powered Industrial Trucks | Ladders |
| Machine Guarding | Face and Eye Protection |
| Consider: Electrical – Wiring Methods 1910.305\* | Hazard Communication\*\* |

*\* This is the violation that dropped off the list, but it has been on in previous years.*

*\*\*The 1926 standard for hazard communication refers to the 1910 standard.*

**Make Your Job Easier Tip 2: Instant Safety Topics!**

Dealing with the immediate site-specific injury-causing issues should always be your first focus. However, you likely have safety committees, employee safety briefings, toolbox meetings, newsletters to write, safety emails to send, etc. The shortened list can now be easy go-to topics. Get your co-workers and safety teams talking about them. As mentioned before, some of these items are going to be related to their behaviors and decisions anyway. Head off the top 10 one person at a time and don’t feel bad if you need to continue to cover them. The world of sales tells us that most people need to hear about something 7 times before it sticks.

**Make Your Job Easier Tip 3: Get Your Documentation in Order**

A number of these areas have specific training and/or inspection requirements. Document, document, document! For training, keep records of who took training, when training was conducted, who the trainer was and what the content of the training included. For inspections, find a way to document these and have a process in place for taking equipment which fails out of service. This will be important information for you during an inspection and can go a long way in staying away from the top 10.

**Make Your Job Easier Tip 4: Incorporate These Into Your Walkthroughs**

If you’re not doing so already, set aside a little bit of time each week to conduct a safety walkthrough and incorporate these items into your checklist. Routine walkthroughs will allow you to keep up on what’s going on at your site, gives you a chance to correct deficiencies, and gives you an opportunity to take advantage of teachable moments to the workers in those areas. Get your employees involved in inspecting their workplace. Have them be on the lookout for these same issues in walkthroughs and peer-to-peer observations.

**Make Your Job Easier Tip 5: Get Help**

You are not Superman/Superwoman. There are too many tasks, crises, and other forces that can get in the way of getting it all accomplished. A good manager needs a supporting cast. If you can get someone at your company to help you with tasks, that would be great. However, if you cannot, consider getting an outside company or safety professional to help. Consultants like iSi are here for a reason. We have people on-staff who have been in your position and have experience with the regulations. We can often do what needs to be done (and done correctly) in a fraction of the time it would take for you to do it, or for you to train someone else internally to do it. This can be as simple as getting help a writing program or conducting training. It could be having an audit done to see where you stand on compliance or a bigger project such as revamping a safety program or day-to-day onsite assistance.

**In Conclusion**

Use the data from the Top 10 as your instant to-do list. If you can tackle the items that pertain to you, you can help do your part in avoiding those common fines and maybe shaking up the list for next year.

**Health Hazards in General Industry – OSHA Regional Emphasis Program Looks at Industrial Hygiene-Related Issues**

OSHA has issued a new regional emphasis program for its Region VII states (Kansas, Iowa, Missouri and Nebraska) that is targeting industries considered to be in the Top 50 for creating worker health hazards. Called, “Top 50 Workplace – Health Hazard,” some of the other OSHA regions have similar emphasis programs, or more targeted programs. Region VII didn’t have a mechanism to inspect for health hazards, so they created this one.

**Effective and Enforcement Dates**

It is effective October 1, 2021 through September 30, 2026. Enforcement begins January 4, 2022.

**What is This About?**

This regional emphasis program is related to industrial hygiene. Industrial hygiene deals with worker occupational health and tests the exposures workers have to potential health hazards. Besides protecting workers from safety injuries, OSHA’s goal is to protect workers from health hazards too. Many health hazards are longer term issues that cannot be found by just looking at a company’s injury/illness data.

Exposures to certain substances may not cause health issues and cancer for a number of years. For example, health issues from asbestos exposure may not arise for 15-50 years after exposure, formaldehyde 2-15 years, benzene 1-10 years, hexavalent chromium 20 years and nickel 13-24 years.

OSHA looked at inspection data from the past 3 years and ranked types of companies by the number of serious violations. They narrowed that list to the Top 50 by NAICS code. From there, they’re putting all the companies that fall within that list into a random picker to develop their first inspection list. All of the companies on that list will be inspected before a new list is generated. If all the companies on the list are not inspected within 3 years, then they’ll carry over to the new list. OSHA will generate a new target list every 3 years at a minimum.

**What Will Be Inspected?**

By knowing what OSHA will be looking for, you’ll have an idea of what you need to do and the procedures to have in place in order to be ready. Inspectors will ask to see your company’s:

* Exposure monitoring\* program;
* Exposure monitoring records;
* OSHA 300 logs to identify threshold hearing shifts, skin disorders, respiratory conditions, poisonings and other illnesses;
* Safety and health programs for ventilation, occupational noise exposure, nonionizing radiation, hazardous materials from [Subpart H](https://www.osha.gov/laws-regs/regulations/standardnumber/1910), PPE, permit-required confined spaces, medical services and first aid, toxic and hazardous substances from [Subpart Z](https://www.osha.gov/laws-regs/regulations/standardnumber/1910) and hazcom; and,
* Your programs for temporary employees. OSHA sees temps as more vulnerable to these types of hazards. And then,
* After the records review, OSHA will conduct a comprehensive walk around of your facility and will be looking for areas where they can conduct occupational exposure sampling to run the tests themselves. That testing will occur as soon as possible. This includes wipe sampling, full-shift and short term monitoring and area sampling. Note: If OSHA shows up for this type of inspection, make sure you do side-by-side sampling with them so that if there are any discrepancies, you’ll be able to point them out.

\*Exposure monitoring includes sampling for your employees’ exposure to various health hazards found in your facility. This could be chemicals and substances such as asbestos, heavy metals, and formaldehyde, solvents and paints, hazardous dusts, welding fumes, noise, vibration, temperature, ventilation and particulates.

Remember that there is a number of OSHA emphasis programs already set in place. If your company is the target of one of them they can happen any time OSHA is already onsite for something else. In the directive for this health hazard emphasis, they mention that if you fall under multiple emphasis areas, they’ll stack them and do them all at once in one comprehensive inspection. In Region VII, there’s already a regional noise and respiratory hazards emphasis program. Also in this region there’s a powered industrial truck emphasis so just having a forklift onsite could start the ball rolling on an inspection.

**OSHA’s Goals – The Inspections’ Report Card**

Knowing OSHA’s goals with these inspections can give you additional insight into what their inspectors will be looking for. Each regional office is required to file a report on their efforts with this emphasis, and in it, they’ll be looking to prove their worth on these efforts, and how their staff helped improve overall workplace health. Some of the data goals include:

* Total number of health hazards abated;
* Total number of overexposures identified;
* Total number of personal air monitoring samples conducted (full shift, short-term, area samples);
* Total number of wipe samples taken;
* Total number of noise samples conducted;
* Total number of workers removed from health hazards;
* Total number of workers found overexposed to each substance found in 1910.1000-1910.1029; and,
* Total number of safety hazards abated/workers removed from safety hazards (that they found at the same time they were there doing the health inspection).

**The Top 50**

This is the list of the Top 50 NAICS code industries who will be inspected.

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**What’s Next?**

Is your company on this list and what do you need to do in order to be ready if your name is drawn?

iSi can help you get ready with program development, exposure monitoring plans and strategies, onsite exposure monitoring and onsite representation during the inspection. Learn more about industrial hygiene [here](https://isienvironmental.com/industrial-hygiene/), or [contact us today](https://isienvironmental.com/contact-us/)!

**What’s on OSHA’s To-Do List?**

**OSHA Publishes Current Regulatory Agenda**

Twice a year the federal agencies publish their regulatory priorities. These are typically listed by what stage each is currently in. What is OSHA working on, and what regulations may you see coming up?

**Final Rule Stage**

These are the ones closest to being issued as a final rule.

**Walking Working Surfaces**

*1910.28(b)(11)(ii), 1910.29(f)(1)*

Feedback about provisions of the 2016 final rule being unclear led OSHA to work to update some formatting errors in Table D-2 and to revise language about the requirements for stair rail systems to make them clearer.

**Procedures for Handling Retaliation Complaints Under Whistleblower Protection Statuses, Under the Anti-Money Laundering Act, and Under the Criminal Antitrust Anti-Retaliation Act**

*Multiple*

These three are basically the same, laying groundwork for procedures on how to handle and investigate complaints and protect retaliation against whistleblowers.

**Proposed Rule Stage**

**Improved Tracking of Workplace Injuries and Illnesses**

*1904.41*

This proposed rule would require establishments already reporting OSHA 300As electronically to submit the OSHA 300 and 301 information electronically as well. This was an original feature of the standard, but was removed in 2019. Those who are required to report electronically are employers with 250 or more employees.

**Hazcom Updates**

*1910.1200*

The last Hazard Communication Standard incorporated the 3rd Edition of the Globally Harmonized System of Classification and Labeling of Chemicals (GHS). GHS has been updated several times since 2012, and OSHA wants to update the standard to reflect the 7th Edition of GHS.

**Amendments to the Crane and Derricks in Construction Standard**

*1926*

* Correct references to power line voltage for direct current (DC) voltages as well as alternating current (AC) voltages;
* Broaden the exclusion for forklifts carrying loads under the forks from "winch or hook" to a "winch and boom";
* Clarify an exclusion for work activities by articulating cranes;
* Provide 4 definitions inadvertently omitted in the final standard;
* Replace "minimum approach distance" with "minimum clearance distance" throughout to remove ambiguity;
* Clarify the use of demarcated boundaries for work near power lines;
* Correct an error permitting body belts to be used as a personal fall arrest system rather than a personal fall restraint system;
* Replace the verb "must" with "may" used in error in several provisions; correct an error in a caption on standard hand signals; and
* Resolve an issue of "NRTL-approved" safety equipment (e.g., proximity alarms and insulating devices) that is required by the final standard, but is not yet available.

**Occupational Exposure to Crystalline Silica in Construction**

*1926.1153(c)*

OSHA wants to seek information on the effectiveness of the dust control measures currently included in Table 1. They also want to find out if there are any other tasks or tools that would be effective to add to Table 1. Employers who follow Table 1 correctly are not required to measure workers’ exposure to silica and are not subject to the permissible exposure limit (PEL).

**Welding in Construction Confined Spaces**

*1926.353*

OSHA wants to amend the Welding and Cutting Standard to remove any ambiguity about the definition of a confined space. The explanation portion of the 2015 Confined Spaces in Construction standard discusses how the welding standard and the confined spaces standard work together. Although the confined spaces standard states that it encompasses welding activities, the welding standard does not expressly identify a definition of "confined space".

**PPE in Construction**

*1926.95*

Clarification of requirements for the fit of PPE in construction.

**Updates to Lockout/Tagout**

*1910.147*

OSHA recognizes technological advancements in computer-based controls of hazardous energy conflict with the LOTO standard. These controls are increasingly being used and there are consensus standards for their design. Other countries are also accepting their use. OSHA wants to look into harmonizing the current standard with those other countries. There is a current RFI out which is seeking information to understand the strengths and limitations of these devices and their potential hazards to workers.

**Powered Industrial Truck Design Standard Update**

*1910.178, 1926.602*

OSHA is proposing to update the referenced ANSI standard from ANSI B56.1-1969 Safety Standard for Powered Industrial Trucks to also include the latest version of ANSI/ITSDF B56.1a-2018, Safety Standard for Low Lift and High Lift Trucks.

**State Plans – Arizona and Massachusetts**

*1952*

In the Arizona rule, OSHA is considering revoking Arizona’s State Plan because they didn’t issue an Emergency Temporary Standard for COVID within the 30 days OSHA gave them to adopt their own standard. State Plans are required to issue regulations as strong as or stronger than federal OSHA.

Massachusetts is applying to have a State Plan applicable only to state and local government employees.

**Specific Industries**

**Medical – Infectious Diseases**

*1910*

This rule is meant to identify standards to protect workers in health care, emergency response, prisons, homeless shelters, drug treatment programs, medical examiners, labs, and other occupational settings where there’s a high risk of transmission of infectious diseases such as TB, MRSA, SARS, chickenpox, shingles and COVID.

**Shipyard Fall Protection – Scaffolds, Ladders and Other Working Surfaces**

*1915.71-1915.77, subpart E*

The current subpart E section of the standard is not comprehensive in its coverage of fall hazards in shipyards. OSHA issued a Request for Information and is considering updating existing standards and dividing the rulemaking into three subparts: subpart E, Stairways, Ladders and Other Access and Egress; subpart M, Fall Protection; and subpart N, Scaffolds.

**Communication Tower Construction and Maintenance**

*1926 and 1910*

Communication tower work has a high fatality rate and construction is expected to greatly increase. OSHA has been collecting information and has determined current fall protection and personnel hoisting guidance may not adequately cover this work. OSHA will be determining if a separate standard is needed, including covering structures that have telecommunications equipment on it or attached to them such as rooftops, buildings, water towers and billboards.

**Tree Care**

*No Specific Reg Cited*

There is no standard for tree care operations, which is a high hazard industry. The tree care industry has petitioned to have a rule, and OSHA has collected information from affected small entities on what may be included in a potential standard.

**Prerule Stage**

**Heat Illness Prevention in Outdoor and Indoor Work Settings**

*No Specific Reg Cited*

This has gotten more publicity in the past few years. In our blog in 2019 we wrote about a [House bill that would require OSHA to develop a formal heat standard](https://isienvironmental.com/osha-heat-standard-blog/). The effort and debate continues. OSHA says that given the potentially broad scope of regulatory efforts to protect workers from heat hazards, as well as a number of technical issues and considerations with regulating this hazard (e.g., heat stress thresholds, heat acclimatization planning, exposure monitoring, medical monitoring), a Request for Information would allow them to begin a dialogue and engage with stakeholders to explore the potential for rulemaking on this topic.

**Blood Lead Level for Medical Removal**

*1910.1025, 1926.62*

OSHA is looking at reducing the trigger level for removing personnel from lead exposures. Current levels require medical removal at 60 µg/dL in general industry, 50 µg/dL in construction and the return of employees to a former job status at below 40 µg/dL. OSHA will be seeking public input on levels, identifying possible areas of the lead standard that need to be revised and how to improve worker protection where preventable lead exposures continue to occur.

**Emergency Response**

*1910*

Current OSHA standards don’t reflect the full range of hazards that emergency responders encounter nor the advancements in PPE, in technology, nor the major developments already being accepted by the emergency response community and consensus standards. OSHA is considering updating these based on information gathered through a request for information and public meetings.

**Process Safety Management and Prevention of Major Chemical Accidents**

*1910.119*

OSHA has been looking at potentially modernizing the PSM standard and related standards since 2013. Stakeholder meetings are next on the list.

**Mechanical Power Presses Update**

*No Specific Reg Cited*

The current OSHA standard is over 40 years old and does not address the use of hydraulic or pneumatic power presses or any other technological changes. OSHA previously published an Advanced Notice of Proposed Rulemaking on Mechanical Power Presses (June 2007) in which it identified several options for updating this standard. It’s still on the list.

**Prevention of Workplace Violence in Health Care and Social Assistance**

*No Specific Reg Cited*

This has been on the list since 2017 and is related to impacts of workplace violence, prevention strategies and other information in health care and social assistance. OSHA was petitioned for a standard preventing workplace violence in health care by a broad coalition of labor unions, and in a separate petition by the National Nurses United. A small business study (like those conducted for specific industries) is next on the list.