**Temporary Workers and OSHA Compliance**

When it comes to temporary workers, who’s responsible for OSHA compliance? Is it the host site, or the staffing agency?

Overall it’s the responsibility of both parties to ensure OSHA standards are being followed and workers are being protected. As a general rule though, OSHA tends to lean towards site-specific issues being handled by the host and general issues be handled by the agency.

**Communication**

OSHA stresses the importance of communication between both the host and the agency and recommends responsibilities be clearly lined out in any contractual language before the working relationship between both companies begins. OSHA will be reviewing any contract between the host and the staffing agency to see where the responsibilities lie.

Staffing agencies are responsible for learning the potential hazards their temporary employees may encounter at the worksite. They should determine what conditions exist, what hazards could be encountered, and how to protect their employees. OSHA says that agencies need not have experts in safety and health on staff, however, they should receive training in hazard identification or employ the assistance of a third-party consultant to help them with those identifications. Ignorance of the regulations, or belief that one party or the other is responsible without it in writing will not be taken as a proper excuse by OSHA.

**Recordkeeping and Reporting**

Both parties are responsible for ensuring employees are involved in the recordkeeping system and that proper records are kept. Both parties are also responsible for making sure employees know how and where to report work-related injuries and illnesses. Neither party can discourage employees from reporting an injury. When an injury does occur, the party who finds out first should report it to the other and then both the host and the staffing agency are to work together to investigate the cause.

When it comes to annual reporting, the employer who is supervising the employee on a day-to-day basis is the one who records the injuries/illnesses on their 300 logs. OSHA says this is most often the host employer.

**Training**

Training is the responsibility of both companies. Staffing agencies must communicate the training that their employees have to the host, and both the agency and the host must ensure the employees have the adequate and compliant training to do the job. The contract between the two parties should line out who’s responsible for which training, but as a rule of thumb, OSHA says that generic safety training would be the responsibility of the staffing agency and site-specific training would be the responsibility of the host site. Any training to temporary employees conducted by the host must be the same as training given to full-time employees.

**PPE and Written Plans**

In the area of PPE, it’s the responsibility of both parties to ensure the proper PPE is worn and provided. Neither can require the employee to purchase it themselves, that is, PPE will need to be provided to the employees. The parties can decide in their contract who’s responsible for purchase and assignment, but in examples from some of the OSHA’s guidance documents in these issues, the host employer will most likely be responsible for dictating what is proper PPE. This is because the host employer is already required to evaluate the workplace for exposure levels, have control over the processes and equipment that produce these hazards, and will be conducting surveillance of the areas. The staffing agency is responsible for knowing what those hazards are and how the employees are being protected.

Each party is required to have OSHA-required written plans when workers will be exposed to certain hazards. Example written safety plans required would include bloodborne pathogens, hearing conservation, hazcom, respiratory protection, lockout-tagout and other hazard-specific plans such hexavalent chromium or the new silica standards. The focus of each plan would be slightly different for each party, but a plan must be on file for each.

**More Guidance**

OSHA has a dedicated site to these issues, along with some good guidance documents for how to handle some regulations such as respiratory protection, industrial truck training, bloodborne pathogens, hazcom, and more at <https://www.osha.gov/temp_workers/index.html>. This site also gives examples of OSHA violations and which party was cited for which element.

Some of these issues, such as respiratory protection which has a number of requirements including medical considerations, can become tricky to navigate so please feel free to [contact iSi](https://isienvironmental.com/index.php/contact-us/) for help in sorting out these issues.

**Sustainability is Much More Than Just Being Green**

Sustainability…that’s a word that’s been thrown around a lot within the past few years and to many it may conjure images of recycling and being a good environmental steward. However, sustainability is more than just that environmental “stuff,” it’s actually much broader and you can count a lot of different practices towards it.

Sustainability can be defined as what your company is doing to contribute to society in terms of social responsibility, economic growth, AND environmental protection. It’s what your company is doing to ensure you are adding value to society by how you manage resources, interact with your community, and work with your employees while staying profitable to sustain jobs for your community.

Large corporations have entire teams dedicated to sustainability strategies. Medium and small companies are soon going to need to develop sustainability strategies in order to keep up. Suppliers are already being asked to implement and start showing their own sustainable actions. It’s not a matter of *if* sustainability will need to be addressed by your company, it’s *when*.

**Goals of Sustainability**

The goal of sustainability is to ensure your company is being a sustainable resource that’s in a way profitable for everyone. It needs to ensure:

* Customers will want to buy from you.
* People will want to work for you.
* Other businesses will want to do business with you.
* The community will want to have you there.
* You’re doing what you need to do to protect natural resources and the environment.
* You’re finding ways to improve efficiencies and lower risk.

**Sustainability Areas**

There are a number of areas in your company where you can find and develop sustainable practices. These include:

* **Community Involvement**: How your company is making the community(ies) you’re located in a better place to live. How do you contribute to improving your community, how do you affect its culture and be a good economic source of jobs?
* **Employment Practices**: Being a good place to work by promoting personal and professional development, diversity, empowerment and participation from your employees.
* **Business Relationships**: Engaging in fair-trading practices with suppliers, distributors and partners
* **Morality and Ethics**: Setting ethical standards and practices in place for working with all persons who have a stake in the success of your business.
* **Transparency**: Timely communications with those affected by your company and being accountable to your internal and external customers.
* **Value of Products and Services**: Providing a good quality product and/or service that adds value, while ensuring customer satisfaction.
* **Regulations Compliance**: What you are doing to ensure you’re following all local, state, and federal regulations.
* **Resource Management**: Managing resources efficiently, conscientiously and effectively.
* **Financial Return**: Compensating providers of capital with a competitive return on their investment and protecting your company assets.
* **Protecting the Environment**: Promoting restoration of the environment, finding ways to reduce waste, and sustainable development of products, processes, services and other activities.

Every department of your company can get involved to affect the process. For example, it can start with Procurement finding raw materials with lower environmental impacts and socially-responsible suppliers, to Production devising processes that are more efficient while maintaining environmental and safety standards, to Marketing who can look at how sales and distribution methods can reduce adverse social and economic impacts.

**What Can Sustainability Include?**

Sustainability efforts can be internal or externally focused. Some examples of each include:

Internal

* Energy efficiency
* Process innovations
* Research and development
* Plant certifications such as ISO 14001, 45001 and 9001
* Process Safety Management
* Audits for environmental standards and practices
* Employee programs and benefits
* Training
* Assessing impacts of new or expected regulations and auditing areas of potential noncompliance
* Minimizing liabilities
* Standardizing systems and measures

External

* Community involvement and philanthropy
* Regulations compliance
* Supplier audits and requirements for work practices
* Supplier certification requirements
* Public disclosure of sustainability reporting
* Including sustainability information in shareholder documents
* New market opportunities and sustainable or environmentally-affected product advances
* Waste minimization
* Social policy statements/guidelines
* Environmental policies
* Avoiding creating contamination

**Other Applicable ISO Standards**

There are ISO standards for other items that would be included in sustainability efforts.

There is an ISO 50001 for Energy Management. Its focus is on how to improve energy use through the development of an energy management system. This management system is the same used for ISO 14001 and 9001.

There is also a standard for social responsibility, ISO 26000. ISO 26000 is a guidance only and cannot be certified like other ISO standards. This standard helps clarify what social responsibility is and gives best practices relating to social responsibility globally.

**Where Do You Start?**

Just saying you’re committed to sustainability isn’t going to make it happen. You need to incorporate it into your company culture. Very much like any effective safety program, this too needs to start with support from top management and become an expectation that trickles down into each and every part of your company until it becomes a part of your corporate culture.

First, you need to decide how sustainable you want to be and what resources you want to dedicate to it. Decide which areas you want to tackle. For it to be successful what you choose to do needs to make financial sense and fit well with your company culture, your products, your location, and/or your customers.

Take a look at what you’re already doing. What else can be done? What are the costs and benefits of what you could do? How can future costs be impacted by improvements you can make today?

Are there companies that you are working for who are requiring (or considering) requiring sustainability efforts? What are those? Are certain certifications such as the ISO 14001 environmental management system going to be required? We are finding that many companies, especially those who work globally, are starting to require suppliers to get ISO certifications like the ISO 14001 because they are a recognized standard for implementing an overall environmental management system. ISO certifications have a set framework that looks at internal and external policies, communications and procedures. Certification also helps demonstrate you are committed to putting standards and procedures in place to comply with regulations. Once you’ve been through one ISO certification, you’ll find the others are very similar, including the ISO 45001 certification for safety because it uses many of the same methods.

Once you decide what you want to do, how far you want to go, and what your budget is going to be, then you’ll need to get different stakeholders involved. You can have an outside company help you get organized, or you can develop your own in-house team. Some companies have created internal committees like they do with safety committees, and some have hired full-time sustainability managers to make sure the effort stays on track.

**How Do You Track Success?**

Sustainability isn’t like sales or other goals your company is used to tracking, it can be hard to put a metric to it. Sustainability is often a long-term goal and harder to predict. It is sometimes harder to implement than other goals because it can be more abstract, but nonetheless important.

Besides typical measures like waste reductions, energy savings, and cost savings, there are other metrics that can be counted towards sustainability. These could include metrics such as

* Recycling savings;
* Training expense per employee;
* Number of sites with environmental or safety certifications;
* On-time delivery;
* Number of jobs posted and filled internally;
* EHS capital expenditures;
* Number of customer complaints;
* Positive reviews;
* Purchases from minority businesses; and,
* Number of workers participating in industry or community organizations.

**In Conclusion**

We at iSi are already hearing that some of our major clients are looking to requiring their suppliers to have sustainability programs in place. We have also had to start developing specific programs related to social issues, not just compliance issues any more.

It looks like sustainability is here to stay and will only continue to grow as an expectation. iSi has a number of services in place to help you with your sustainability efforts and we are here to help in any way we can.

[Learn more about iSi’s sustainability services here](https://isienvironmental.com/sustainability).

In a [previous blog](https://isienvironmental.com/index.php/superfund-cleanup-reuse-blog/) we discussed the plans EPA had for expediting the cleanups of Superfund sites in hopes of reducing costs, reducing delays caused by long studies, and speeding up the timeline for getting the lands turned over for redevelopment, reuse and community revitalization. On its one-year anniversary, EPA has published a progress report on the efforts of their Superfund Task Force.

Among the successes within the past year:

* “Substantial progress” has been made on cleanup of 21 sites which were targeted for immediate and intense action;
* Seven sites were deleted from the program and 2 were partially deleted. There are an additional 10 sites currently proposed to be added to that list;
* Sites with human exposures are being tracked in real time on a dashboard-style webpage. An additional 24 sites were added to the list as having human exposures under control;
* EPA listed 31 sites with the greatest reuse potential, and as a result, they received over 120 redevelopment-related prospective purchaser inquiries for these;
* EPA and the Department of Justice engaged a national team of redevelopment experts on the issue of liabilities for third-party developers and issued a new policy that encourages more frequent consideration of Bona Fide Prospective Purchaser Agreements and Prospective Purchaser Agreements to help get cleanup and reuse moved forward; and,
* EPA held 1,370 public meetings and 3,190 in-person meetings and interviews with people living near Superfund sites to obtain their input.

Within the next year, the task force wants to implement any remaining recommendations from the original 42. Other goals include:

* Continue to model enforcement language to reduce responsible party cleanup negotiation timeframes and shorten Potentially Responsible Party lead cleanups.
* Encourage private investment in cleanup and reuse by developing new work agreements and comfort letters to create certainty and assist third parties in identifying investment opportunities at the sites;
* Continue to expedite cleanups and moving sites to deletion from the program;
* Use more adaptive management principles where possible; and,
* Complete an evaluation of groundwater beneficial use policies.

A [video of success stories](https://youtu.be/btUramqS7G4) has been developed. More information about the Task Force program can be found [here](https://www.epa.gov/newsreleases/superfund-task-force-announces-one-year-anniversary-accomplishments-and-plan-year-two).

Entire Report: <https://www.epa.gov/sites/production/files/2017-07/documents/superfund_task_force_report.pdf>

11 specific actions: <https://www.epa.gov/superfund/administrator-pruitts-memo-regarding-receipt-superfund-task-force-report-and-next-steps>

**EPA Task Force Recommends Measures to Expedite Superfund Cleanups for Quicker Reuse**

There are over 1,300 Superfund sites currently in various stages of cleanup.  Cleanup, and the studies associated with it, can be a drawn out process, leaving property reuse and community revitalization on hold for years.  In May, EPA Administrator Scott Pruitt established a task force to look into the improving and streamlining the Superfund Cleanup process.

The task force worked on finding solutions to a number of goals: finding ways to expedite cleanup and reuse of the sites, how to engage partners and encourage private investment, promoting redevelopment and community revitalization, and finding ways to reinvigorate the potentially responsible parties’ (PRPs) efforts for cleanup and reuse.

The task force had 42 recommendations, and Pruitt has narrowed the list to these first priority tasks:

* Within 60 days, each EPA region is to:
  + Identify and prioritize sites where the risk of human exposure is not fully controlled.
  + Submit the total indirect costs charged to PRPs for 2016 and 2017 and what formula they use to determine that number.
  + Make a list of the sites expected to be proposed for deletion or deleted within the next 12 months in order to expedite deletions.
  + Submit cleanup status and reuse potential information for each site in their region.
* Prevent years of delay-causing studies by using more early/interim response actions to address immediate risks and source migration.  Where possible, allow portions of sites for reuse while more detailed evaluations of the other portions are carried out.
* Focus training, tools and resources on the sites with the most reuse potential.
* Prioritize and focus resources on Remedial Investigation and Feasibility Studies (RI/FS) for those sites which require more immediate action.
* Identify pilot sites where Adaptive Management strategies can be used.
* Encourage PRPs, state and local governments and real estate to work together to identify opportunities where PRP-lead cleanups to consider future reuse.
* Encourage PRPs to work with end-users to voluntarily perform assessments and additional cleanup for betterment to achieve reuse objectives.
* Track remedy implementation and completion progress in real time using the Superfund Enterprise Management System or similar.
* Use enforcement authorities and unilateral orders to recalcitrant PRPS more actively to discourage drawn out negotiations over response actions.
* Use purchase agreements for potential Bona Fide Prospective Purchasers (BFPP) to outline the actions necessary to preserve their BFPP status.

Pruitt has promised more steps are coming and is encouraged by the new ideas and dynamic thinking from task force.   The force included dozens of agency professionals with collaboration from over 100 people.  View the task force’s entire report here.

Linked In

<https://www.linkedin.com/company/isi-environmental-services>

Facebook

iSi: https://www.facebook.com/isienvironmental

SafetyPlans: https://www.facebook.com/safetyplans

EHS Bootcamp: <https://www.facebook.com/groups/262766608311977>

Instagram

<https://www.instagram.com/isienvironmental/>

Twitter

<https://twitter.com/iSi_ICT>

iSi Blog

<https://isienvironmental.com/blog/>

Pinterest

https://www.pinterest.com/isienvironmentalict

OSHA’s Silica Rule: General Industry vs. Construction

OSHA’s crystalline silica rule has been finalized. There are separate requirements for general industry/maritime and construction.

**First, How Do You Become Exposed to Silica?**

Crystalline silica can cause respirable and kidney disease and some cancers. Crystalline silica is a basic component of sand, soil, granite and many minerals. Common forms include quartz, cristobalite and tridymite. It becomes respirable when it is cut, ground, drilled or chipped.

In general industry and maritime, silica is associated with industries such as concrete and ready-mix concrete products, cut stone, foundries, support for oil and gas operations, railroads, asphalt roofing materials, jewelry, dental labs, porcelain enameling, shipyards, structural clay and pottery.

In construction, silica exposures come with working with materials containing silica. Grinding, drilling, sawing, cutting or chipping concrete, stone, cement or cement fiberboard would all be examples of potential silica exposures.

**Requirements Applicable to All**

*29 CFR 1910.1053 and 1926.1153*

The general industry/maritime and the construction regulations share some requirements including:

* **Written Exposure Control Plan** — Your company must prepare and implement a written exposure control plan that identifies tasks which could create exposures and the methods your company will use to protect workers.
* **Housekeeping** — Housekeeping practices such as dry sweeping, dry brushing, and the use of compressed air (unless used in conjunction with a ventilation system) which expose workers to silica where feasible alternatives are available is not allowed.
* **Training** — Worker training in silica exposure is required. Workers must be able to demonstrate: knowledge of hazards, specific tasks which could cause exposures, the employer’s methods of controlling exposures, information from the silica standard and the purpose and description of the medical surveillance program. To help document demonstration of knowledge, you may want to give a quiz.
* **Recordkeeping** — Your company must keep detailed records of silica exposure and medical exams on file. For general industry/maritime, it’s all detailed exposure sampling records. How your company chooses to comply with the standard will determine which records you keep.

**General Industry/Maritime-Specific Requirements**

*29 CFR 1910.1053*

General Industry/Maritime requirements are more geared toward proving silica exposures are occurring below certain levels and thus there is more of a sampling focus.

***Exposure Sampling***

Employers must conduct exposure monitoring for silica if the potential for exposure could be at or above an action level of 25 µm3 (micrograms per cubic meter of air), averaged over an 8-hour day. The maximum limit, also known as the permissible exposure limit (PEL) is 50 µm3,averagedover an 8-hour day (the old PEL was 100 µm3). If your workers’ exposures are above the PEL, your company must take measures to protect workers from exposure.

Affected employees must be notified, in writing, of assessment results and what’s being done to control exposures. If results are above the action level but below the PEL, sampling will need to occur every 6 months until exposures are below the action level for 2 consecutive measurements. If results are above the PEL, sampling will need to occur every 3 months until exposures are below the *action* level for 2 consecutive measurements.

Unless the potential for silica exposure is 0%, if there’s even a slight potential for silica exposures, it’s best to conduct the sampling to know exactly what your exposure levels are for documentation purposes. Documentation of your exposure assessment is very important for your recordkeeping files and shows due diligence with the standard.

Anytime a process or change occurs in the facility, monitoring must be conducted again.

***Other Requirements***

* **Dust Controls** — Dust controls need to be used to protect workers from exposures above the PEL. In most cases, wet methods and ventilation can be used to aid in this. Again, your exposure sampling will be able to tell you how well your dust controls are working.
* **Respirators** — When dust controls don’t keep exposures below the PEL, respirators are required.
* **Medical Exams** — Medical exams including chest X-rays and lung function tests must be offered to workers exposed at or above the action level (25 µm3) for 30 or more days per year. These must be offered every 3 years.
* **Warning Signs** — Warning signs must be posted at entrances to areas where exposures above the PEL may occur.

***Compliance Deadlines***

Employers must comply with all requirements of the standard by June 23, 2018 with some exceptions for medical surveillance and hydraulic fracturing.

Medical surveillance for those exposed above the PEL (50 µm3) for 30 or more days must be offered to employees starting June 23, 2018. Medical surveillance for those exposed above the action level (25 µm3) for 30 or more days starting June 23, 2020.

Hydraulic fracturing operations in the oil and gas industry must implement their engineering controls to limit exposures to the new PEL by June 23, 2021. Significant efforts are currently being made to develop effective dust control technologies specifically for this industry. Many of these are in development and have demonstrated promise. Although some are commercially available, many are still in development and those available now have not been widely implemented yet. The potential effectiveness of these controls is why OSHA has given some extra time for this industry for development and implementation.

**Construction-Specific Requirements**

*29 CFR 1926.1153*

Construction requirements are more geared toward methods of controlling exposures.

***Table 1***

The construction standard has a table of common construction tasks and the instructions on how to control dust for each. This is referred to as Table 1. As long as your company is following the actions required of Table 1, your company will not be required to conduct sampling and won’t be subject to the PEL requirement.

Please note that some of the instructions in Table 1 require workers to wear respirators. If your workers currently do not wear respirators, use of respirators will trigger the need to comply with 29 CFR 1910.134 for use of respirators. This would include developing a written respiratory protection program, annual respirator physicals, annual respirator training and annual respirator fit-testing.

[Download Table 1]

***What if You Don’t Want to Follow Table 1?***

Employers who choose not to follow the guidance of Table 1 will then be subject to the requirements of the action level and the PEL. This triggers the additional sampling and monitoring requirements that the general industry standard requires.

Employers will need to conduct exposure monitoring for silica if the potential for exposure could be at or above an action level of 25 µm3 (micrograms per cubic meter of air), averaged over an 8-hour day. The PEL is 50 µm3,averagedover an 8-hour day (the old PEL for construction was 250 µm3).

Affected employees must be notified in writing of assessment results and if it’s above the PEL, the notification will need to include what’s being done to control exposures. If results are above the action level but below the *PEL*, sampling will need to occur every 6 months until exposures are below the *action* level for 2 consecutive measurements. If results are above the PEL, sampling will need to occur every 3 months until exposures are below the *action* level for 2 consecutive measurements.

Unless the potential for silica exposure is 0%, if there’s even a slight potential for silica exposures, it’s best to conduct the sampling to know exactly what your exposure levels are for documentation purposes. Documentation of your exposure assessment is very important for your recordkeeping files and shows due diligence with the standard.

Anyone above the PEL and not using Table 1 must take measures to protect workers from exposure. Dust controls need to be used to protect workers from exposures above the PEL. When dust controls don’t work, respirators are required.

***Other Requirements for Construction***

* **Medical Exams** — Medical exams that include chest X-rays and lung function tests must be offered to workers who are required by the standard to wear respirators for 30 or more days per year. These exams must be offered every 3 years.
* **Competent Person** — Your company will need to designate a competent person to implement the your written exposure control plan.
* **Restricted Access** — Procedures for how your company will restrict access to work areas where high exposures may occur must be included in your written exposure control plan.

***Compliance Deadlines***

Employers must comply with all requirements of the standard by June 23, 2017. If your company chooses to use exposure sampling and laboratory analysis, then the compliance deadline for laboratory evaluation of exposure samples is June 23, 2018.

**Now What? How Can iSi Help You With This Standard?**

iSi is here to help your company comply with this new standard. We can assist with:

* **Compliance Determinations, Audits and Checklists** – Helping you determine if this standard applies to you, evaluating your site for exposure potential, determining areas needing warning signs or restricted access, and making a compliance checklist for you
* **Exposure Sampling** – Sampling your facility or construction sites for exposure levels, arranging for lab analysis of samples, preparing documentation for recordkeeping, and preparing your written employee notices
* **Written Program Development** – Preparing your exposure control plan or respiratory protection program
* **Training** – Silica training and respiratory protection training
* **Respirator Fit-Testing** – Annual respirator fit-testing (after your medical surveillance is complete)
* **Answering Questions** – Our safety and industrial hygiene experts on-staff can help you with any other questions you may have.

**New Silica Rule Enforcement: OSHA Giving “Good Faith Efforts” a 30 Day Extension**

OSHA’s new Silica in Construction Rule (29 CFR 1926.1153) went into effect on September 23. For most regulations, this is typically the day the agency can start enforcing the rule and issuing citations. Because of the way the rule is structured, with the Table 1 approach, OSHA’s instructed its regional administrators to take employers’ good faith efforts into account when conducting inspections over the next 30 days.

This means if you are required to comply with the new rule, and making an effort to come into compliance, OSHA will likely use any potential violations as an opportunity for assistance and outreach rather than enforcement. This will occur for 30 days, or until October 23. After that time, inspection and citation directives will be finalized and the rule will be fully enforced.

If OSHA finds your company is NOT trying to comply yet, they will be conducting air exposure monitoring of your site, and you will be eligible for citations. Any citations issued before October 23 will need to be reviewed by OSHA’s National Office.

Are you making a good faith effort right not? What do you need to be working on to comply with the standard? Watch our free silica in construction webinar!

**How Does the Shut Down Affect EPA, OSHA and DOT?**

We were working on preparing price proposals for two separate federal agencies this week and one greeted with a return email saying it is closed, while the other agency is still open. This prompted the question…what about the other regulatory agencies we work with such as EPA, OSHA and the DOT?

**EPA**

In short, **part of EPA is open while the other is closed**. Those functions still open involve ensuring there are personnel necessary to respond to emergencies involving safety of human life or the protection of property.

***Functions Still Open at EPA***

* Activities essential to ensure safe continued public health and safety including safe use of food and drugs and safe use of hazardous materials;
* Superfund projects, where failure to maintain operations would pose an imminent threat;
* EPA labs where it’s necessary to ensure physical integrity of research property and research conditions;
* Law enforcement, legal counseling and criminal investigations;
* Protection of federal lands/buildings/equipment; and,
* Emergency response readiness and disaster service.

***Functions Closed at EPA***

* **Inspections;\***
* Non-emergency environmental site sampling;
* New contract obligations;
* Existing contract obligations and task orders;
* Existing grant, cooperative agreement and interagency agreement obligations;
* Payment activities including contracts, grants and payroll;
* Travel;
* New hiring; and,
* Non-mission critical IT systems.

**\*While federal inspectors are on hold, please note that state environmental inspections are likely to continue using other sources of funding.**

For more information on EPA’s shutdown, [take a look at their contingency plan](https://www.epa.gov/aboutepa/us-epa-contingency-plan-event-government-shutdown).

**OSHA**

**At OSHA, it is business as usual because their agency is funded through September of this year.** The same goes for MSHA, so inspectors for both agencies are still out and active.

**DOT**

**At DOT, some agencies of DOT are busier than others are.**

It’s business as usual for the Federal Motor Carrier Safety Administration and the Federal Highway Administration because they’ve already been funded by multi-year appropriations.

***Functions Closed at DOT***

At other DOT agencies, about half of the staff have been furloughed. Much of what is closed has been administrative such as rulemaking and program development, training, research, purchasing, and grants.

***Functions Open at DOT***

Those functions still operational include:

* **Hazardous materials (hazmat) inspections** of shippers and carriers;
* **Hazmat enforcement activities;**
* Hazmat testing facilities and cylinder reconditioning facilities;
* Hazmat approvals and permits for emergencies only;
* Pipeline safety regulation inspectors;
* Those who manage rail and pipeline accidents/incident investigations; and,
* Pipeline operations/systems inspectors.

For more information about all the DOT shutdown activities, [download their Shutdown Contingency Plan](http://libraryarchives.metro.net/DB_Attachments/180119_USDOT_Consolidated_2018_Shutdown.pdf).

**Workplace Safety Technology: T-Mobile for Business Adds 4G LTE Smart HardHat and Contactless Temperature Device**

T-Mobile for Business has added two new workplace safety technology products focused on using technology to make workplaces safer. Each one also has features to help provide solutions related to recent concerns with workplace health. The first product is a “smart” hard hat by Guardhat. The other is a contactless temperature device for people entering crowded or confined spaces. Both will take advantage of T-Mobile’s 4G LTE connectivity.

**Guardhat**

Guardhat utilizes sensors that let you know where the worker is at all times and what conditions they are working in order to analyze that data. It also allows for audio and video communications so that you can see what they see and communicate back and forth with a central control center.

Some of the features include:

* **Location**: Geofencing sensors track where Guardhat wearers are at, at all times. Persons at a central control center can see where they are on a map. Wearers can be alerted when they’re getting too close to hazards such as moving equipment, lockout/tagout areas, working areas like trenches or equipment drop zones and other dangers. Sensors can be placed on all types of equipment and other assets so it can be tracked as well.
* **Communications**: Guardhat wearers can communicate with the control center through voice and video capabilities.
* **Environment Monitoring**: The hat will sense gases, noise, temperature and pressure issues and sound an alert until the worker gets to a safe location. Persons at the control center will be able to use the camera on the hat and the locating sensors to help guide the worker to safety, if needed.
* **Physical Monitoring**: The hat monitors vital stats and if it senses something is medically wrong with a worker wearing one, it will send an alert to other Guardhat users in the area and then will contact emergency medical services.
* **Fall Detection**: The hat will sense when a worker has fallen and will alert other wearers in the area as well as emergency services.
* **Social Distancing**: Location sensors can also be setup to ensure workers are working 6 feet from each other for social distancing purposes.

Guardhat is good for workers in areas with a number of hazards around them as well as workers who work alone in isolated areas.

**PIMMAP Contactless Temperature Solution**

The PIMMAP Contactless Temperature Solution is an 8-inch HD tablet that is an infrared camera and contactless temperature sensor. It can be mounted to stands, kiosks or stations in places like schools, offices, arenas, factories, stores, hospitals, etc.

A person will stand in front of the device and it will use its infrared camera and facial recognition features to take temperatures at accuracy readings +/- 0.36 degrees F. Facial recognition technology will also scan for signs of fatigue, watery eyes, and other flu-like symptoms.

Readings can be taken from 3-5 feet from the device and can scan 40 persons per minute. An alert will come up on the screen if the temperature is too high.

The data for the device can be transferred to cloud servers and they can send push notifications. They can also be worked on and troubleshot remotely. If there’s no internet access where the device is located, it has its own 4G LTE router.

To learn more about these workplace safety technology devices, check out [T-Mobile’s news release about them here.](https://www.t-mobile.com/news/network/powering-new-tech-to-keep-workplaces-safe)

**Safety Compliance Audit Document Review Information 12-16-2022**

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| **General Information** |  |
| 1. Project Number |  |
| 1. Audit Date(s) |  |
| 1. Facility Name |  |
| 1. Facility Address |  |
| 1. North American Industrial Classification System code(s) (NAICS) |  |
| 1. Standard Industrial Classification code(s) (SIC) |  |
| 1. Number of employees including temporary employees |  |
| 1. Shifts |  |
| 1. Union Facility? |  |
| 1. Number of main manufacturing buildings |  |
| 1. Description of business and production rate |  |
| 1. Facility Safety Representative(s) |  |
| 1. Audit Report Addressed to: |  |
| 1. Maps of Facility |  |
| 1. Any previous OSHA inspections or citations? |  |

Ask for safety manual and table of contents.

Describe new hire orientation training process.

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| **General Duty Clause Items** | | | | | | | | | | | **Yes/No/NA** | | **Comments** | | | |
| 1. Personal Fall Protection Equipment being inspected annually by component person? | | | | | | | | | | |  | |  | | | |
| 1. Is high visibility clothing provided per ANSI 107? Class 1 – off-road environments with moving equipment/vehicles and struck-by hazards; Class 2/3 – Roadway hazards traffic with moving equipment/vehicles. | | | | | | | | | | |  | |  | | | |
| 1. Boilers inspected or maintained properly? | | | | | | | | | | |  | |  | | | |
| 1. Excessive heat stress for employees controlled or mitigated? | | | | | | | | | | |  | |  | | | |
| 1. No unmitigated workplace violence threats or circumstances known to management? | | | | | | | | | | |  | |  | | | |
| **Worker’s Compensation (Department of Labor)** | | | | | | | | | | |  | |  | | | |
| 1. Is copy of Workers Compensation Rights and Responsibilities posted in one or more conspicuous places (State of KS is 2013 version or newer. Form K-WC-40-A). *K.S.A. 44-520* | | | | | | | | | | |  | |  | | | |
| **Part 1903 – Inspections, Citations and Proposed Penalties** | | | | | | | | | | | **Yes/No/NA** | | **Comments** | | | |
| 1. Is an OSHA poster displayed in the workplace in a conspicuous place where notices to employees are customarily place? *(1903.2(a)(1))* | | | | | | | | | | |  | |  | | | |
| **Part 1904 – Recordkeeping and Reporting Occupational Injuries and Illnesses** | | | | | | | | | | | **Yes/No/NA** | | **Comments** | | | |
| 1. Does employer have at least 5 years of OSHA logs? (exempt if <10 employees or on 1904.3 Appendix A partially exempt industries ) *1904.33(a)*    1. Get copies of last 5 years for OSHA 300 and 300A | | | | | | | | | | |  | |  | | | |
| * Can break one business location into two or more establishment only when (i) each establishment represents a distinctly separate business (ii) each business is engaged in a different economic activity (iii) no one industry description applies to the joint activities of the establishments (iv) separate reports are routinely prepared for each establishment (employees, sales, wages). * Can combined more than one physical location if (i) operates as single business under common management (ii) in close proximity (iii) keep one set of business records for the locations. Intent is for a single physical location (not grouping facilities). Should be within a few blocks. Might have different NAICS codes. *1904.46*   Original regulation started in 1971. | | | | | | | | | | | | | | | | |
| 1. Are employees not on payroll (temps, leasing, contractors) but are supervised by company included on OSHA 300 logs? *1904.31* | | | | | | | | | | |  | |  | | | |
| 1. Is copy of last year’s OSHA 300A still posted? If not, when is it posted? (required 2/1 through 4/30). Must be hard copy and not electronic positing. *1904.32(a); LOI 2-28-14.* | | | | | | | | | | |  | |  | | | |
| 1. Is the correct person signing the OSHA 300A? OSHA requires that a company executive (owner of corporation, officer of corporation, highest ranking company official at the establishment, or the immediate supervisor of the highest ranking company official) is the only one within a company authorized to sign the annual OSHA 300A Injury Summary. *1904.32(b)(4)* | | | | | | | | | | |  | |  | | | |
| 1. Did employer submit OSHA 300A to OSHA electronically for previous year(s) by 3/2? Required if equal or greater than 20 employees. Count heads. Includes part-time, seasonal, and temporary workers at any one time during the calendar year. Regulation started with calendar year 2016. *1904.41(a)* | | | | | | | | | | |  | |  | | | |
| 1. Spot check a couple of injuries from most recent year to see if a corresponding incident report exists. *1904.29(b)(2)* | | | | | | | | | | |  | |  | | | |
| 1. Are employees **informed** on how to report injuries? *1904.35(a)(1)* | | | | | | | | | | |  | |  | | | |
| 1. Did facility report timely deaths or injuries in last 5 years? Applies to all employers including partially exempt and <10 employees. *1904.39*    1. Within 8 hours of death    2. Within 24 hours       1. In-patient hospitalization       2. Amputation       3. Loss of an eye | | | | | | | | | | |  | |  | | | |
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| **Subpart D – Walking / Working Surfaces (1910.21 thru 1910.30)** | | | | | | | | | | | **Yes/No/NA** | | **Comments** | | | |
| 1. Are walking-working surfaces are inspected, regularly and as necessary, and maintained in a safe condition? *1910.22(d)(1)* | | | | | | | | | | |  | |  | | | |
| 1. Scaffolds – General Industry (1910.27) must meet requirements of 1926 subpart L (196.451) for Construction.    1. **Training** – Each employee must be trained who works on a scaffold.    2. Inspections – Before each work shift and after any occurrence that could affect structural integrity.    3. Erecting and Dismantling – A competent person must inspect the scaffolding. | | | | | | | | | | |  | |  | | | |
| 1. Scissor lifts – Completing initial **training**? *1910.27(a) referencing 1926.452(w)* | | | | | | | | | | |  | |  | | | |
| 1. Do employees use personal fall protection devices?    1. If so, does employer provide **training** for each employee who uses personal fall protection systems? *1910.30(a)(1)* | | | | | | | | | | |  | |  | | | |
| 1. Do employees receiving **training** on WWS equipment (i.e. ladders, dockboards, rope descent) *1910.30(b)* | | | | | | | | | | |  | |  | | | |
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| **Subpart E – Exit Routes and Emergency Planning (1910.33 thru 1910.39)** | | | | | | | | | | | **Yes/No/NA** | | **Comments** | | | |
| 1. Emergency exit signs and lighting provided for egress? *1910.37(b)* | | | | | | | | | | |  | |  | | | |
| 1. Are the emergency lights in proper working order at all times? *1910.37(a)(4)*   NFPA says to test every 30 days for 30 seconds and for 90 minutes annually. *2021 NFPA 101 7.9.3.1* | | | | | | | | | | |  | |  | | | |
| 1. Is there a **written emergency action plan** available if more than 10 employees? If 10 or fewer, plan may be oral. *1910.38(b)*    1. Procedures for reporting a fire or other emergency;    2. Procedures for emergency evacuation, including type of evacuation and exit route assignments;    3. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate;    4. Procedures to account for all employees after evacuation;    5. Procedures to be followed by employees performing rescue or medical duties; and    6. The name or job title of every employee who may be contacted by employees who need more information about the plan or an explanation of their duties under the plan.   Should include items such as fire, tornadoes, toxic chemical releases, hurricanes, blizzards, floods, bomb threats, terrorist attacks, etc. | | | | | | | | | | |  | |  | | | |
| EAP required if applicable to any of the following: *(described in compliance directive CPL 2-1.037 dated 7-9-2002)*   * 1910.119 - Process Safety Management * 1910.160 – Fixed Extinguisher Systems, General * 1910.164 - Fire Detection Systems * 1910.272 - Grain Handling Facilities * 1910.1047 - Ethylene Oxide * 1910.1050 - Methylenedianiline * 1910.1051 - 1,3-Butadiene?   Almost every business is required to have an emergency action plan (EAP). If fire extinguishers are required or provided in your workplace, and if anyone will be evacuating during a fire or other emergency, then OSHA's [29 CFR 1910.157] requires you to have an EAP. The only exemption to this is if you have an in-house fire brigade in which every employee is trained and equipped to fight fires, and consequently, no one evacuates.  In most circumstances, immediate evacuation is the best policy, especially if professional firefighting services are available to respond quickly. There may be situations where employee firefighting is warranted to give other workers time to escape, or to prevent danger to others by spread of a fire. In this case, the employer is still required to have an EAP. *[OSHA’s eTool website]* | | | | | | | | | | | | | | | | |
| 1. Is there an employee alarm system in place? Alarm must use distinctive signal for each purpose. Facilities with <11 employees may use direct voice. *1910.38(d) & 1910.165* | | | | | | | | | | |  | |  | | | |
| 1. Is there **training** on the Emergency Action Plan? (Initial, responsibilities change, or plan changes) *1910.38(f)* | | | | | | | | | | |  | |  | | | |
| 1. Is a **written fire prevention plan** available if more than 10 employees? If 10 or fewer, plan may be oral. *1910.39(b)*    1. A list of all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard;    2. Procedures to control accumulations of flammable and combustible waste materials;    3. Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials;    4. The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires; and    5. The name or job title of employees responsible for the control of fuel source hazards. | | | | | | | | | | |  | |  | | | |
| If no fire extinguishers in the workplace – FPP required.  Is the facility required to comply with 1910.157 Portable Fire Extinguishers?   1. No one is allowed to use fire extinguishers – FPP required. 2. Certain employees are authorized to use fire extinguishers – FPP NOT required. 3. All employees are authorized to use fire extinguishers – FPP NOT required.   FPP required if applicable to any of the following:   * 1910.1047 - Ethylene Oxide * 1910.1050 - Methylenedianiline * 1910.1051 - 1,3-Butadiene | | | | | | | | | | | | | | | | |
| 1. Are employees **informed** initially of fire hazards to which they are exposed? *1910.39(d)* | | | | | | | | | | |  | |  | | | |

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| **Subpart F – Vehicle-Mounted Elevating and Rotating Work Platforms (1910.66 thru 1910.68)** | **Yes/No/NA** | **Comments** |
| 1. Are only **trained** persons operating aerial lifts? *1910.67(c)(2)(ii)* |  |  |

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| **Subpart G – Occupational Health and Environmental Control (1910.94 thru 1910.98)** | **Yes/No/NA** | **Comments** |
| 1. Abrasive blasting enclosures ventilated to minimize visible spurts of dusts? *1910.94(a)(3)* |  |  |
| 1. Has monitoring been performed for noise exposure for the different job tasks or locations when information indicates >85dB? *1910.95(d)* |  |  |
| 1. Baseline and annual hearing evaluations (audiograms) completed? *1910.95(g)* |  |  |
| 1. Initial and annual **training** for employees in hearing conservation program? *1910.95(k)* |  |  |
| 1. Copy of of Occupational Noise Exposure standard posted in workplace (1983 requirement)? *1910.95(l)(1)* |  |  |
| 1. Noise exposure measurements maintained for 2 years and audiograms maintained for duration of employment? *1910.95(m)(3)* |  |  |
| 1. Nonionizing Radiation – Applies to radio stations, radar equipment and other radiation equipment for communication, radio navigation, and industrial and scientific purposes.    1. For electromagnetic frequencies from 10 MHz to 100 GHz, protection guide is 10 mW/cm2 *(1910.97(a)(2)*    2. Warning symbol posted “Warning - Radio Frequency Radiation Hazard”? Red isosceles triangle above an inverted black isosceles triangle. *1910.97(a)(3)* |  |  |

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| **Subpart H – Hazardous Materials (1910.101 thru 1910.126)** | **Yes/No/NA** | **Comments** |
| 1. Is documentation available that flammable liquid storage room has at least 6 air exchanges per hour? *1910.106(d)(4)(iv)* |  |  |
| 1. Spray (paint) booths have ventilation survey done to verify they meet air flow requirements? Only applies to open faced booths. 100 ft/min for non-electrostatic and 60 ft/min for electrostatic. *1910.107(b)(5)(i)* |  |  |
| 1. Spray (paint) booths have automatic sprinklers inside the space on the downstream and upstream sides of the filters? *1910.107(b)(5)(iv)* |  |  |
| Standards 106 and 107 are original from 1974 based on NFPA consensus standards in 1960’s. OSHA is wanting to update. | | |
| 1. Process Safety Managagement – Subject to PSM requirements? *1910.119(a)*    * A process which involves a chemical at or above the specified threshold in Appendix A.    * A process which involves a Category 1 flammable gas or a flammable liquid with flashpoint <100F at 10,000 lbs or more      1. Excludes hydrocarbon fuels used as such      2. Excludes flammable liquids stored in atmospheric tanks    * Does NOT apply to retail facilities, oil or gas well drilling or servicing or normally unoccupied remote facilities   PSM facilities are required to do a full compliance audits at least every 3 years according to the PSM standard – *1910.119(o)* |  |  |
| PSM is Original standard from 1992. OSHA wants to update to address numerous changes. Request for information in 2013. Public discussion in 2022. | | |
| Hazardous waste operations and emergency response (HAZWOPER)? 1910.120(a)(1) applies to:   * 1. Clean-up operations at uncontrolled hazardous waste sites   2. Clean-up operations for RCRA sites corrective actions   3. Voluntary clean-up operations at sites as uncontrolled hazardous waste sites   4. Operations involving hazardous wastes at treatment, storage, and disposal (TSD) facilities   5. **Emergency response operations for hazardous substances**   #1, 2, and 3 are regulated together while #4 and #5 are regulated separately. See iSi HAZWOPER requirements chart for full overview. **Only #5 is mentioned on this audit form.** | | |
| 1. HAZWOPER - Is there a **written emergency response plan** including the following? *1910.120(q)(1).*    1. Pre-emergency planning and coordination with outside parties    2. Personnel roles, lines of authority, training, and communication    3. Emergency recognition and prevention    4. Safe distances and places of refuge    5. Site security and control    6. Evacuation routes and procedures    7. Decontamination    8. Emergency medical treatment and first aid    9. Emergency alerting and response procedures    10. Critique of response and follow-up    11. PPE and emergency equipment |  |  |
| 1. HAZWOPER - Completing initial and refresher **training**? *1910.120(q)(6)*  |  |  |  |  | | --- | --- | --- | --- | | Function | Duties | Initial | Refresher | | First Responder Awareness | Identification and Reporting only | No time requirement  Sufficient training or experience | Annually of sufficient content and duration | | First Responder Operations Level | Contain release from safe distance, keep it from spreading, and prevent exposures | 8 hours or sufficient experience | Annually of sufficient content and duration | | Hazardous Materials Technician | Stop releases at the source and complete all contain, control, and cleanup operations | 24 hours | Annually of sufficient content and duration | | Hazardous Materials Specialist | Trained on specific hazardous materials and situations. Interface with authorities. | 24 hours | Annually of sufficient content and duration | | On Scene Incident Commander | Assumes control of the incident scene beyond the first responder awareness level. | 24 hours | Annually of sufficient content and duration | | | |
| 1. HAZWOPER - Completing initial, annual, and termination medical surveillance? Termination exam not required if last exam within 6 months. *1910.120(q)(9)*  |  |  | | --- | --- | | Who | Frequency | | 1. HAZMAT Team members 2. Hazardous Material Specialists | 1. Prior to assignment 2. Every 12 months 3. At termination or reassignment if >6 months since last exam 4. ASAP upon notification of signs or symptoms 5. More frequent times if physician determines medically necessary | | Exhibiting signs and symptoms which resulted from exposure to hazardous substances | 1. ASAP upon notification of signs or symptoms 2. More frequent times if physician determines medically necessary | | | |

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| **Subpart I – Personal Protective Equipment (1910.132 thru 1910.138)** | **Yes/No/NA** | **Comments** |
| 1. Is there documentation of a task specific PPE evaluation and hazard assessment (need date and person certifying assessment)? *1910.132(d)(1)* |  |  |
| 1. Are employees **trained** on PPE use? *1910.132(f)* |  |  |
| 1. Using eye and face protection when exposed to flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation? *1910.133* |  |  |
| 1. Is there a **written respiratory protection program** for mandatory use *(or voluntary elastomeric)* of respirators that includes work-site specific procedures? *1910.134(c)(1)*    1. Procedures for selecting respirators for use in the workplace;    2. Medical evaluations of employees required to use respirators;    3. Fit testing procedures for tight-fitting respirators;    4. Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;    5. Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;    6. Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators;   *If there is no end-of-service life indicator (ESLI) appropriate for conditions in the employer's workplace, the employer implements a change schedule for canisters and cartridges that is based on objective information or data that will ensure that canisters and cartridges are changed before the end of their service life. The employer shall describe in the respirator program the information and data relied upon and the basis for the canister and cartridge change schedule and the basis for reliance on the data.*   * 1. Training of employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations;   2. Training of employees in the proper use of respirators, including putting on and removing them, any limitations on their use, and their maintenance; and   3. Procedures for regularly evaluating the effectiveness of the program. |  |  |
| 1. Do any employees use respirators voluntarily? If so, is there an Appendix D on file? *1910.134(c)(2)* |  |  |
| 1. Is a program administer designated? *1910.134(c)(3)* |  |  |
| 1. Medical evaluations completed before use (voluntary use of filtering facepiece respirators exempt)? *1910.134(e)* |  |  |
| 1. Fit testings completed before use and annually? *1910.134(f)* |  |  |
| 1. Are SCBA respirators, emergency use respirators inspected monthly, and before and after each use? *1910.134(h)(3)* |  |  |
| 1. Are emergency escape-only respirators inspected before placement into the workplace? *1910.134(h)(3)(i)(C)* |  |  |
| 1. Are emergency use respirators certifying the respirator by documenting: *1910.134(h)(3)(iv)*    1. Date    2. Name (or signature) of person who made inspection    3. Findings    4. Required remedial actions    5. Serial number or other identifying means   Information needs to be provided on   * Tag or label that is attached to storage compartment, or * Kept with respirator, or * Included with inspection reports stored as paper or electronic files |  |  |
| 1. Is documentation available that breathing air has been sampled to meet Grade D requirements? *1910.134(i)* |  |  |
| 1. Do all air compressors for breathing air have equipment to: *1910.134(i)*    1. Prevent entry of contaminated air into the air-supply system;    2. Minimize moisture content;    3. Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions;    4. Have a tag containing the most recent change date and the signature of the person authorized by the employer to perform the change. The tag shall be maintained at the compressor. 2. Is air compressor oil lubricated? 3. For compressors that are not oil-lubricated, the employer shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm. 4. For oil-lubricated compressors, the employer shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.   *Most manufacturers require monthly calibration with a certified canister of carbon monoxide gas.* |  |  |
| 1. Initial and annually **training** for mandatory use of respirators? *1910.134(k)* |  |  |
| 1. Do employees wear protective helmets when working in areas where there is potential or injury to the head from falling objects? *1910.135(a)(1)* |  |  |
| 1. Do employees use protective footwear when working in areas where there is danger of foot injuries due to falling or rolling objects or objects piercing the sole? *1910.136(a)* |  |  |
| 1. Are electrical rubber insulating gloves being tested every 6 months? *1910.137(c)(2)(viii)* |  |  |
| 1. Do employees wear appropriate hand protection when exposed to hazards such as absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, and harmful temperature extremes. *1910.138(a)* |  |  |

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| **Subpart J – General Environmental Controls (1910.141 thru 1910.147)** | **Yes/No/NA** | **Comments** |
| 1. If facility uses Danger/Caution signs and tags, are employees **instructed** on their meaning? *1910.145(c)(1), (c)(2), & (f)(4)(v)* |  |  |
| Confined spaces (146)   * 1. Is large enough and so configured that an employee can bodily enter and perform assigned work; and   2. Has limited or restricted means for entry or exit (for example, tanks, vessels, silos, storage bins, hoppers, vaults, and pits are spaces that may have limited means of entry.); and   3. Is not designed for continuous employee occupancy. | | |
| Permit-required confined spaces (146)   1. Contains or has a potential to contain a hazardous atmosphere; or 2. Contains a material that has the potential for engulfing an entrant; or 3. Has an internal configuration such that an entrant could be trapped or asphyxiated by inwardly converging walls or by a floor which slopes downward and tapers to a smaller cross-section; or 4. Contains any other recognized serious safety or health hazard. | | |
| 1. Are confined spaces labeled appropriately? *1910.146(c)(1) & (c)(2)* |  |  |
| 1. Confined space – Are reclassified non-permit confined spaces documented during entries? *1910.146(c)(7)* |  |  |
| 1. Confined space – Are expired permits reviewed annually (which also serves as an annual program review)? *1910.146(d)(14)* |  |  |
| 1. Confined space – Does facility use written confined space permit? Review past permits. *1910.146(f)* |  |  |
| 1. Confined space – Review past permits and look for the following: (146)    1. Atmospheric test    2. Lack of post-entry air monitoring    3. Ventilation equipment    4. Duration of authorization not specified    5. Duration of authorization exceeded    6. Entry and/or exit times missing    7. No or missing SDS review    8. Entrant not listed    9. Attendant not listed    10. No supervisor approval and/or permit cancellation    11. No toxicity or LEL levels recorded |  |  |
| 1. Is **training** conducted initially, before changes in duties, before changes in operations that present new hazard, or inadequacies in employee knowledge? *1910.146(g)* |  |  |
| 1. Confined space – Has rescue and emergency services been established? Non-entry first, then entry rescue. *1910.146(k)* |  |  |
| 1. LOTO – Are machine specific LOTO procedures available? *1910.147(c)(4)* |  |  |
| 1. LOTO – Is an annual audit of the LOTO being performed on each energy control procedure? Can group like procedures together and also do sampling technique as long as sampling is representative of LOTO operations per OSHA directive CPL 02-00-147 dated 2-11-2008 . *1910.147(c)(6)* |  |  |
| 1. LOTO – Authorized employees **trained** initially and for new procedures? *1910.147(c)(7)(i)(A)* |  |  |
| 1. LOTO – Affected employees **instructed** initially? *1910.147(c)(7)(i)(B)* |  |  |

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| **Subpart K – Medical and First Aid (1910.151 thru 1910.152)** | **Yes/No/NA** | **Comments** |
| 1. Does the facility have on-site first aid responders? If not, how far away is the nearest responder? *1910.151(b)*   No more than 3-4 minutes if serious accidents are possible such as falls, suffocation, electrocution, or amputation. In low hazard workplaces such as offices, 15 minutes is reasonable. *LOI 1-16-07.* |  |  |
| 1. Is there documentation that safety showers and eyewash stations are being inspected on a weekly basis? *1910.151(c)* |  |  |

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| **Subpart L – Fire Protection (191.155 thru 1910.165)** | **Yes/No/NA** | **Comments** |
| 1. Is there documentation that fire extinguishers being inspected on a monthly basis? *1910.157(e)(1) and (2)* |  |  |
| 1. Is there documentation that a certified licensed contractor is inspecting the fire extinguishers on an annual basis? *1910.157(e)(3)* |  |  |
| 1. Is portable fire extinguisher **training** provided initially and annually to those persons allowed to use them? *1910.157(g)* |  |  |
| 1. Is there documentation that the fire sprinkler systems are being inspected at least annually by licensed sprinkler contractor? *1910.159(c)(2)* |  |  |
| 1. Is there documentation that the facility fire/smoke detectors are inspected (recommended annually)? *1910.164(c)(2) and (c)(4)*   If you install an automatic fire detection system to satisfy the alarm and signaling requirement of the "Fixed Extinguishing Systems" standard, then you are also required to comply with the "Fire Detection Systems" standard. [29 CFR 1910.160 and 29 CFR 1910.164] But if you install a system only for insurance purposes and not to satisfy any OSHA regulation, you do not need to comply with this standard. |  |  |
| 1. Is an employee alarm system in place? Facilities with <11 employees may use direct voice. *1910.165(b)* |  |  |

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| **Subpart M – Compressed Gas and Air (1910.169)** | **Yes/No/NA** | **Comments** |
| 1. Are all safety valves on air receivers tested frequently and at regular intervals? Use manufacturer requirements or annually if no information and able to test without removing valve. *1910.169(b)(3)(iv)* |  |  |

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| **Subpart N – Materials Handling and Storage (1910.176 thru 1910.184)** | **Yes/No/NA** | **Comments** |
| 1. Rim Wheels – Are employees **trained** in the hazards involved in servicing rim wheels? Applies to servicing of multi-piece and single piece rim wheels used on large vehicles such as trucks, tractors, trailers, buses, and off-road machines. Do NOT apply to automobiles, pickup trucks, or vans with automobile tires or tires “LT”. *1910.177(c)* |  |  |
| Powered Industrial Trucks (PIT’s) include forklifts, tractors, platform lift trucks, motorized hand trucks, powered pallet jacks, tugs, and other equipment with internal combustion engines. Does NOT include earth moving equipment. | | |
| 1. PIT – Are the correctly rated PIT’s being used in designated locations for hazardous atmospheres? *1910.178(c)* |  |  |
| 1. PIT – Are employees **trained** initially, evaluated initially and then re-evaluated every 3 years thereafter? *1910.178(l)* |  |  |
| 1. PIT - Inspected daily? Documentation recommended but not required. *1910.178(q)(7)* |  |  |
| 1. Cranes – Are only designated personnel permitted to operate a crane? (Designated means qualified to perform duties. **Training** not explicitly stated but implied.) *1910.179(b)(8)* |  |  |
| 1. Cranes – Is there documentation that hoists have been inspected frequently (daily or monthly) or periodic (1 to 12 months)? *1910.179(j)* |  |  |
| **Daily Functional Test** (considered frequent)– Before every shift, visual test. Not required to be documented. | | |
| **Frequent**: Daily to monthly intervals dependent on the nature of the critical components of the crane and the degree of their exposure to wear, deterioration, or malfunction. Includes all Daily Functional Testing plus hoist brake, wire rope, load chain, and listening for abnormal signs. Hook and latch inspection.  Normal service – monthly  Heavy service – weekly to monthly  Severe service – daily to weekly | | |
| **Periodic**: 1 to 12 month intervals dependent upon the crane’s activity, severity of service, and environment in which it is used.  Normal service – yearly  Heavy service - yearly  Severe service – quarterly | | |
| 1. Cranes – Are operational and rated load tests performed prior to initial use? *1910.179(k)* |  |  |
| 1. Slings – Are periodic (at least annually) inspections being performed (Quarterly for slings with severe service use)? *1910.184(d)* |  |  |

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| **Subpart O – Machinery and Machine Guarding (1910.211 thru 1910.219)** | **Yes/No/NA** | **Comments** |
| - **Mechanical power presses** include machines that shear, punch, form, or assemble metal or other material by means of cutting, shaping, or combination dies attached to slides. Press consists of a stationary bed or anvil and a slides having a controlled reciprocating motion toward and away from the bed surface, the slide being guided in a definite path by the frame of the press. A machine based on the slider-crank mechanism that converts the rotating motion to reciprocating motion. The main components for power transmission on a mechanical power press are the clutch, flywheel, and crankshaft. The slide is attached to a crankshaft with connecting rods (“pitmans”) and the crankshaft is coupled to the flywheel, which always rotates when the motor is running. A clutch is used to connect the spinning flywheel to the crankshaft. The crankshaft converts the rotary motion of the flywheel to the downward and upward motions of the press slide.  - Two different types of clutches are used on mechanical power presses: full-revolution and part-revolution clutches. Full revolution clutches, when tripped, cannot be disengaged until the crankshaft has completed a full revolution and the press slide has completed a full stroke. Presses equipped with full-revolution clutches are typically older and more hazardous due to their cycling operation. A part-revolution clutch can be disengaged at any point before the crankshaft has completed a full revolution and the press slide has completed a full stroke.  - Does NOT include press brakes, hydraulic and pneumatic power presses, bulldozers, hot bending, and hot metal presses, forging presses and hammers, riveting machines and similar types of fastener applicators. Original standard from 1971. | | |
| 1. Does the facility have full revolution or partial revolution mechanical power presses?    1. Full revolution clutch – Guard, pullback, restraint, A type gate, Two hand trip, Safe opening.    2. Partial revolution cluth - Guard, pullback, restraint, A or B type gate, Two hand control, Presence sensing, Safe opening. | | |
| 1. Mechanic power presses – (General component) Periodic and regular inspections of each power press, including maintaining record of inspection including date, maintenance, repair, signature of person, and equipment identifier? *1910.217(e)(1)(i)* |  |  |
| 1. Mechanic power presses – (Directed component) Weekly inspection to determine condition of clutch/brake mechanism, antirepeat feature, and single-stroke mechanism? Needs record. *1910.217(e)(1)(ii)* |  |  |
| 1. Mechanical power presses - Maintenance personnel shall be **trained** to insure the original and continuing competence of maintenance personnel. *1910.217(e)(3)* |  |  |
| 1. Mechanical power presses - Are operators **trained** and **instructed** prior to work? *1910.217(f)(2)* |  |  |
| 1. Mechanical power presses - Reporting all point-of-operation injuries within 30 days of occurrence to OSHA? *1910.217(g)(1)* |  |  |
| 1. Mechanical power-transmission apparatus – Inspections not to exceed 60 days? Not required to be documented. *1910.219(p)(1)* |  |  |

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| **Subpart P – Hand and Portable Powered Tools and Other Hand-Held Equipment (1910.241 thru 1910.244)** | **Yes/No/NA** | **Comments** |
| 1. Are floor jacks inspected (Constant or intermittent use at least every 6 months)? *1910.244(a)(2)(vi)* |  |  |

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| **Subpart Q – Welding, Cutting and Brazing (1910.251 thru 1910.255)** | **Yes/No/NA** | **Comments** |
| 1. Authorization to cut or weld given by Supervisor, preferably in form of written permit? *1910.252(a)(2)(iv)* |  |  |
| 1. Firewatchers available whenever in locations where other than a minor fire might start? *1910.252(a)(2)(iii)* |  |  |
| 1. Are individual welding booths enclosed with noncombustible screens that permit air flow at floor level? If not, workers adjacent to work shall be protected from the rays by appropriate eyewear. *1910.252(b)(2)(iii)* |  |  |

**Subpart R – Special Industries**

261 – Pulp, paper, and paperboard mills

262 – Textiles

263 – Bakery Equipment

264 – Laundry machines and operations

265 – Sawmills

266 – Logging operations

268 – Telecommunications

269 – Electric power generation, transmission, and distribution

272 – Grain handling facilities

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| **Subpart S – Electrical (1910.301 thru 1910.399); NFPA 70E** | **Yes/No/NA** | **Comments** |
| 1. Do employees work on live electrical equipment >50 volts? Includes voltage testing. If so, |  |  |
| Has the facility conducted an arc flash hazard analysis to determine incident energy potential of equipment, limited approach boundary, restricted approach boundary, prohibited approach boundary, required PPE? If not, electricians must use lookup tables provided in 70E to arrive at correct PPE usage. | | |
| * 1. Have the “qualified” employees working on live electrical equipment received **training** specific to the hazards of arc flash, arc blast, shock and electrocution? Training is only required initially, but NFPA70E is every three years. *1910.332(b)(1)* |  |  |
| * 1. Are “unqualified” employees **trained** in and familiar with electrically related safety practices which are necessary for their safety? *1910.332(b)(2)* |  |  |
| * 1. Does the facility have the correct arc flash and shock PPE? *1910.335(a)(1)(i)* |  |  |
| * 1. Are voltage-rated gloves tested at least every six months?   Cited as PPE violation *1910.137(c)(2)(viii)* |  |  |
| Do employees that work on energized electrical equipment >50 volts use an Energized Work Permit? *Recommendation and used in NFPA70E* |  |  |
| 1. Are hazardous (classified) locations documented for areas established after August 13, 2007? LOI on 12-12-97 states documentation not required. *1910.307(b)* |  |  |

**Subpart T – Commercial Diving Operations (1910.401-440)**

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| **Subpart Z – Air Contaminants (1910.1000)** | **Yes/No/NA** | **Comments** |
| 1. Has respirable IH sampling been conducted for potential exposures to hazardous substances?    1. Building materials – asbestos, PCB’s, mold, formaldehyde, lead    2. Dust – agricultural, diesel, silica, metals    3. Painting / solvents    4. Process chemicals    5. Vapor degreaser    6. Welding |  |  |

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| **Subpart Z – Asbestos (1910.1001)** | **Yes/No/NA** | **Comments** |
| 1. Has the facility done any monitoring to determine if airborne concentrations of asbestos are above the PEL? (Includes brakes and clutches) *1910.1001(d)*    1. 1.0 fiber per cubic centimeter over 30 mins (excursion limit)    2. 0.1 fiber per cubic centimeter over 8 TWA (PEL) |  |  |
| 1. Scheduled IH monitoring if above PEL or excursion limit (30 min) (every 6 months)? *1910.1001(d)(3).* |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? *1910.1001(d)(7)* |  |  |
| 1. Demarcation of regulated areas above PEL or excursion limit and limited to authorized employees? *1910.1001(e)* |  |  |
| 1. Are filtering facepiece respirators prohibited for use against asbestos fibers? *1910.1001(g)(3)* |  |  |
| 1. Are bags and containers with contaminated clothing and equipment labeled and person who cleans/launders the clothing/equipment notified? *1910.1001(h)(3)* |  |  |
| 1. Is asbestos included in the Hazard Communication Plan? *1910.1001(j)(1)* |  |  |
| 1. Are warning signs (must be as specified in standard) posted at each regulated area? *1910.1001(j)(4)* |  |  |
| 1. Are warning labels affixed to all raw materials, mixtures, scraps, waste, debris, and other products containing asbestos fibers? *1910.1001(j)(5)* |  |  |
| 1. Are employees **trained** initially and annually? *1910.1001(j)(7)* |  |  |
| 1. Are employees informed of availability of self-help smoking cessation program material? NIH Publication No. 89-1647 or equivalent. *1910.1001(j)(7)(v)(C)* |  |  |
| 1. Are employees place in medical surveillance program? Initial, annual, and termination medical examination. *1910.1001(l)* |  |  |
| 1. Has an asbestos survey been completed? Stopped use in USA in 1977. OSHA uses 1980 as final installation date. Recommendation. |  |  |

Chronic health issues include mesothelioma and lung cancer. Latency period is 15-50 years.

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| **Subpart Z – Access to Medical Records (1910.1020)** | **Yes/No/NA** | **Comments** |
| 1. Are employee medical records maintained for duration of employment plus 30 years? *1910.1020(d)(1)(i)*    1. Health insurance forms separate from medical program    2. First aid records |  |  |
| 1. Are employee exposure records maintained for 30 years? *1910.1020(d)(1)(ii)*    1. Industrial hygiene sampling    2. Safety data sheets (SDSs)    3. Biological monitoring results |  |  |
| 1. Access to Medical and Exposure Records – Are employees **informed** initially and annually thereafter of right to medical and exposure records? Posting sufficient based on CalOSHA form and OSHA All-in-One-Poster. *1910.1020(g)(1)* |  |  |

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| **Subpart Z – Beryllium (1910.1024)** | **Yes/No/NA** | **Comments** |
| 1. Are determination completed for operations containing beryllium in airborne concentrations? *1910.1024(d)(1)*    1. One sample for each shift, for each job classification, and in each work area.   Action level – 0.1 µg/m3 8-hr TWA  PEL – 0.2 µg/m3 8-hr TWA  STEL – 2.0 µg/m3 for 15 min |  |  |
| 1. Periodic monitoring *1910.1024(d)(3)*    1. >Action level and < PEL – every 6 months    2. > PEL – every 3 months |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? If feasible corrective actions still exist to lower exposure, the notification must include corrective actions. *1910.1024(d)(6)* |  |  |
| 1. Demarcation of regulated areas that are above PEL or STEL and limiting access to unauthorized persons? *1910.1024(e)(1)* |  |  |
| 1. **Written Exposure Control Plan**? *1910.1024(f)(1)*    1. List of operations and job titles expect to have airborne or dermal exposure    2. List of operations and job titles expected to be above action level    3. List of operations and job titles expected to be above PEL or STEL    4. Procedures to minimize cross-contamination    5. Procedures for keeping surfaces free of beryllium    6. Procedures for minimizing migration of beryllium to other areas    7. List of engineering controls, work practices, and respiratory protection required    8. List of PPE and equipment required    9. Procedures for removing, laundering, storing, cleaning, repairing, and disposing of contaminated clothing, equipment, and respirators. |  |  |
| 1. Annual review of written exposure control plan? *1910.1024(f)(1)(ii)* |  |  |
| 1. Are engineering and work practices implemented to the lowest level feasible? *1910.1024(f)(2)* |  |  |
| 1. Are job rotations prohibited to achieve compliance with PEL? *1910.1024(f)(3)* |  |  |
| 1. Are PAPR’s provided when employees choose to wear one instead of a negative pressure respirator? *1910.1025(f)(3)(ii)* |  |  |
| 1. Has employer informed in writing the persons or business who lauder, clean, or repair PPE or clothing of the harmful effects of beryllium? *1910.1024(h)(3)(iii)* |  |  |
| 1. Are washing facilities readily available to remove beryllium from hands, face, and neck? *1910.1024(i)(1)* |  |  |
| 1. Are change rooms provided where employees are required to remove their personal clothing? *1910.1024(i)(2)* |  |  |
| 1. Are showers provided if exceeding PEL or STEL? Or if beryllium is contaminating hair or body parts other than hands, face, and neck? *1910.1024(i)(3)* |  |  |
| 1. Are eating, drinking, smoking, chewing tobacco, gum, or applying cosmetics all prohibited in regulated areas? *1910.1024(i)(4)* |  |  |
| 1. Are all disposal materials in sealed, impermeable enclosures and labeled with regulated labeled? *1910.1024(j)(3)* |  |  |
| 1. Are medical examinations occurring at: *1910.1024(k)*    1. >30 days above action level    2. Showing signs and symptoms of CBD or other beryllium related health effects    3. Exposured to beryllium during emergency    4. Recommendations by written medical opinion    5. Every 2 years if above action level more than 30 days per year    6. Termination of employment unless last exam within 6 months of termination |  |  |
| 1. Are medical examinations covering the following? Employee may opt out of any or all parts of the medical examination: *1910.1024(k)(3)*    1. Medical and work history with emphasis on beryllium, smoking history, and respiratory system    2. Physical exam of respiratory system    3. Physical exam of skin rashes    4. Pulmonary function tests    5. Standardized BeLPT or equivalent test and analyzed by certified lab    6. A low dose computed tomography (LDCT) scan when recommended by PLHCP    7. Any other test deemed appropriate by PLHCP |  |  |
| 1. Are warning signs posted at each approach to regulated areas? *1910.1024(m)(2)* |  |  |
| 1. Are employees above action level **trained** initially prior to initial job and annually thereafter? *1910.1024(m)(4)* |  |  |
| 1. Are training records maintained for 3 years? *1910.1024(n)(4)* |  |  |

Chronic health issues include berylliosis and lung cancer. Latency period is 15-25 years.

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| **Subpart Z – Lead (1910.1025)** | **Yes/No/NA** | **Comments** |
| 1. Exposure determination completed for operations containing lead in airborne concentrations? *1910.1025(d)(3).* 2. Must be at least 7 continuous hours 3. One sample for each shift for each job classification in each work area. 4. Should represent regular, daily exposure to lead   Action level – 30 µg/m3 8-hr TWA  PEL – 50 µg/m3 8-hr TWA |  |  |
| 1. Periodic monitoring *1910.1025(d)(6)*  * >Action level and < PEL – every 6 months * > PEL – every 3 months |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? *1910.1025(d)(8)* |  |  |
| 1. Is there a **written compliance program**? *1910.1025(e)(3)*    1. Description of each operation in which lead is emitted.    2. Description of the specific means that will be employed to achieve compliance, including engineering plans and studies used to determine methods selected for controlling exposures.    3. Report of technology considered in meeting the PEL.    4. Air monitoring data which documents the source of lead emissions.    5. A detailed schedule for implementation of the program including documentation such as copies of purchase orders for equipment, construction contracts, etc.    6. A work practice program    7. An administrative control schedule    8. Other relevant information |  |  |
| 1. Is the written program revised and updated at least annually? *1910.1025(e)(3)(iv)* |  |  |
| 1. If mechanical ventilation is used to control exposure, are quarterly measurements taken to demonstrate the effectiveness of the system? *1910.1025(e)(4)* |  |  |
| 1. If administrative controls are used to reduce employees TWA exposure to lead, is there a job rotation schedule? *1910.1025(e)(5)* 2. Name or identification of each employee 3. Duration and exposure levels 4. Any other information which may be useful. |  |  |
| 1. Are full face respirators provided instead of half-face when there are lead aerosols that cause eye or skin irritation? *1910.1025(f)(3)(i)* |  |  |
| 1. Are PAPR’s provided when employees choose to wear one instead of a negative pressure respirator? *1910.1025(f)(3)(ii)* |  |  |
| 1. Are necessary clothing and equipment provided at no cost? *1910.1025(g)(1).* Including: 2. Coveralls or similar full-body clothing 3. Gloves, hats, and shoes or disposable shoe covers 4. Face shields, vented goggles, or other appropriate PPE.   Must be provided weekly, and if >200µm/m3 daily. |  |  |
| 1. Is all contaminated protective equipment removed at the completion of work in designated change rooms only? *1910.1025(g)(2)(iv)* |  |  |
| 1. Is the person who cleans or launders protective clothing or equipment informed in writing of the potentially harmful effects of lead exposure? *1910.1025(g)(2)(vi)* |  |  |
| 1. Are there labels on bags and containers of contaminated clothing and PPE that states the requirements in the standard? *1910.1025(g)(2)(vii)* |  |  |
| 1. Are there change rooms provided that are equipped wih separate storage facilities for clothing and PPE and for street clothes to prevent cross-contamination? *1910.1025(i)(2)* |  |  |
| 1. Are showers provided and do employees shower at the end of their work shift? *1910.1025(i)(3)* |  |  |
| 1. Are lunchrooms provided that are: *1910.1025(i)(4)* 2. Temperature controlled 3. Positive pressure 4. Filtered air supply 5. Readily accessible. |  |  |
| 1. Is biological monitoring in place for employees working above the action level? 1910.1025(j)(2) 2. At least every 6 months 3. Every 2 months for employees >40 µg/100g of whole blood 4. Monthly during the removal period |  |  |
| 1. Are follow-up blood tests completed with 2 weeks if an employee’s result is above the medical removal threshold? *1910.1025(j)(2)(ii)* |  |  |
| 1. Are employees notified in writing within 5 days if results are >40 µg/100g? *1910.1025(j)(2)(iv)* |  |  |
| 1. Are medical examinations taking place at required intervals? 1910.1025(j)(3) 2. Annually for employees >40 µg/100g in preceding 12 months. 3. Prior to first assignment in area > action level. 4. As soon as possible if showing symptoms of lead intoxication. 5. As medically appropriate |  |  |
| 1. Are employees > action level **trained** initially prior to initial job and annually thereafter? *1910.1025(l)(1)* |  |  |
| 1. Is lead included in the hazard communication program? *1910.1025(m)(1)* |  |  |
| 1. Are signs posted at each work area >PEL as written in standard? *1910.1025(m)(2)* |  |  |
| 1. Are medical records maintained for 40 years or the duration of employment plus 20 years, whichever is longer? *1910.1025(n)(2)(iv)* |  |  |

Lead-based paints banned for use in 1978. Could still be used by painters after that year, some lead-based paints still found in homes built in 1990’s.

Original standard from OSHA from 1978 (Construction industry was 1993). Epidemiological and experimental studies indicate that chronic exposure resulting in blood lead levels (BLL) as low as 10 µg/dL in adults are associated with impaired kidney function, high blood pressure, nervous system and neurobehavioral effects, cognitive dysfunction later in life, and subtle cognitive effects attributed to prenatal exposure. Pregnant women need to be especially concerned with reducing BLL since this can have serious impact on the developing fetus.

“Chronic exposures leading to BLLs above 20 µg/dL can cause subclinical effects on cognitive functions as well as adverse effects on sperm/semen quality and delayed conception. BLLs between 20 to 40 µg/dL are associated with effects such as cognitive aging as well as deficits in visuomotor dexterity, lower reaction times, and attention deficit. At BBLs above 40 µg/dL, workers begin to experience symptoms such as headache, fatigue, sleep disturbance, joint pain, myalgia, anorexia, and constipation.

“OSHA’s general industry and construction lead standards include a medical removal protection provision for workers whose blood lead levels reach or exceed 50 µg/dL (construction) or 60 µg/dL (general industry). Recently, medical management guidelines for adult lead exposure have been developed by a national expert panel coordinated by the Association of Occupational and Environmental Clinics (AOEC), in collaboration with the NIOSH [National Institute for Occupational Safety and Health] Adult Blood Lead Epidemiology and Surveillance (ABLES) program. The panel recommends that maintaining BLLs below 20 µg/dL over a twenty-year period, or below 10 µg/dL over a forty-year period, would be sufficient to prevent chronic effects associated with cumulative exposures.”

In a September 2013 letter, the CDPH informed Cal/OSHA that it had determined that having chronic BLLs in the range of 5 to 10 µg/dL poses a health risk to working adults. According to the CDPH, to bring BLLs below the 5- to 10-µg/dL range, **a PEL for lead not exceeding 0.5 to 2.1 µg/m3 would need to be established and met by employers.**

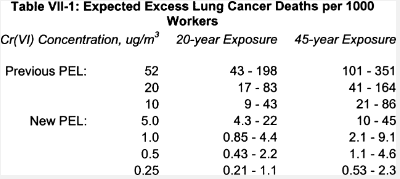
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| **Subpart Z – Hexavalent Chromium (1910.1026)** | **Yes/No/NA** | **Comments** |
| 1. Exposure determination completed for operations containing Cr(VI) that release dusts, fumes, or mists? *1910.1026(d)(1)*  * Action Level – 2.5 µm/m3 as 8-hr TWA * PEL – 5 µm/m3 as 8-hr TWA |  |  |
| 1. Scheduled IH monitoring?  * > Action level and < PEL – every 6 months * > PEL – every 3 months   If <action level sampling only required if new or additional exposures. *1910.1026(d)(2)* |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? *1910.1026(d)(3)* |  |  |
| 1. Demarcation of regulated areas above PEL and limited to authorized employees? *1910.1026(e)* |  |  |
| 1. For painting aircraft or large aircraft parts, is the exposure controlled to under 25 µg/m3, or the employer must show this is not feasible? *1910.1026(f)(1)(ii)* |  |  |
| 1. Are bags and containers with contaminated clothing and equipment labeled and person who cleans/launders the clothing/equipment notified? *1910.1026(h)(2) and (3)* |  |  |
| 1. Are change rooms provided that prevent cross contamination? LOI on 9-2-11 for detail. *1910.1026(i)* |  |  |
| 1. Initial and annual medical surveillance for employees above PEL more than 30 days/year? Medical evaluation also needed if terminated and last exam more than 6 months prior. *1910.1026(k)* |  |  |
| 1. Are employees **trained** initially on the contents of the Cr(VI) standard? *1910.1026(l)(2).* |  |  |

Chronic health issue is lung cancer. Latency period is 20 years. Generally in people aged 55 years and older.

OSHA's previous standards for workplace exposure to Cr(VI) were adopted in 1971, pursuant to section 6(a) of the Act, from a 1943 American National Standards Institute (ANSI) recommendation originally established to control irritation and damage to nasal tissues (36 FR at 10466, 5/29/71; Ex. 20-3). OSHA's general industry standard set a permissible exposure limit (PEL) of 1 mg chromium trioxide per 10 m3 air in the workplace (1 mg/10 m3 CrO3) as a ceiling concentration, which corresponds to a concentration of 52 μg/m3 Cr(VI).

Standard revised in 2006 to lower PEL from 52 to 5 µm/m3 as 8-hr TWA**.**

OSHA acknowledged that the new limit will still allow 10 to 45 excess deaths from lung cancer for every 1,000 workers exposed to the metal over a 45-year period. But they said as many as 145 of the lung cancer deaths that occur annually as a result of previous actual exposures will be prevented under the 2006 rule.



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| **Subpart Z – Cadmium (1910.1027)** | **Yes/No/NA** | **Comments** |
| 1. Is initial monitoring taking place for place employees exposed to airborne cadmium above action level? *1910.1027(d)(1)(i)*  * Action level – 2.5 µg/m3 * PEL – 5 µg/m3 |  |  |
| 1. If exposures are above action level, is periodic monitoring taking place at least every 6 months? *1910.1027(d)(3)(i)* |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? *1910.1027(d)(5)(i)* |  |  |
| 1. Demarcation of regulated areas above PEL and limited to authorized employees? *1910.1027(e)* |  |  |
| 1. Are methods of compliance in place to achieve PEL by engineering controls and work practices? Refer to standard for details. *1910.1027(f)(1)* |  |  |
| 1. If >PEL, is there a **written compliance program?** Must include: *1910.1027(f)(2)(i) and (ii)*    1. Description of each operation in which cadmium is emitted    2. Description of the specific means that will be employed to achieve compliance    3. A report of the technology considered in meeting the PEL    4. Air monitoring data that document the sources of emission    5. A detailed schedule for implementation of the program, including documentation such as purchase orders for equipment, construction contracts, etc.    6. A work practice program    7. A written plan for emergency situations    8. Other relevant information |  |  |
| 1. Is the written program reviewed and updated at least annually? *1910.1027(f)(2)(iii)* |  |  |
| 1. Are full face respirators provided if employees experience eye irritation? *1910.1027(g)(3)(i)(B)* |  |  |
| 1. Are HEPA filters provided for powered and non-powered air purifying respirators (100’s)? *1910.1027(g)(3)(i)(C)* |  |  |
| 1. Are PAPR’s provided if employee chooses to wear one instead of a negative-pressure respirator as long as PAPR provides adequate protection? *1910.1027(g)(3)(ii)* |  |  |
| 1. Is there a **written plan** for dealing with emergency situations involving substantial releases of airborne cadmium? *1910.1027(h)* |  |  |
| 1. If exposed above PEL, are protective work clothing and PPE provided at no cost, including: *1910.1027(i)*    1. Coveralls or similar full-body work clothing    2. Gloves, head coverings, and boots or foot coverings    3. Face shields, vented goggles, or other appropriate PPE |  |  |
| 1. Are employee’s protective clothing and equipment contaminated with cadmium only removed in change rooms? *1910.1027(i)(2)(i)* |  |  |
| 1. Is protective clothing and equipment provided in a clean and dry condition on at least a weekly basis? *1910.1027(i)(3)(i)* |  |  |
| 1. Is the person who launders or cleans the protective clothing and equipment informed of the potentially harmful effects of exposure to cadmium? *1910.1027(i)(3)(v)* |  |  |
| 1. Are change rooms provided that are equipped with separate storage facilities for street clothes and for protective clothing and equipment? *1910.1027(j)(2)* |  |  |
| 1. Are employees who are exposed above the PEL showering at the end of the work shift? *1910.1027(j)(3)(i)* |  |  |
| 1. Is a medical surveillane program established for employees above the action level for more than 30 days in a 12-month period? *1910.1027(l)(1)(i)* |  |  |
| 1. Is an initial examination taking place within 30 days of initial exposure? Consists of: *1910.1027(l)(2)*    1. Detailed medical and work history    2. Biological monitoring       1. Cadmium in urine       2. Beta-2 microglobulin in urine       3. Cadmium in blood |  |  |
| 1. Are periodic medical surveillance examination taking place? Including: *1910.1027(l)(4)*    1. Medical – within 12 months after initial and then biennially    2. Biological – Annually    3. Emergency – as soon as possible    4. Termination – if more than 6 months since last examination |  |  |
| 1. Is cadmium included in the hazard communications program? *1910.1027(m)(1)(iii)* |  |  |
| 1. Are warning signs provided and displayed in regulated areas and at all approaches to area? Needs to read as required by standard. *1910.1027(m)(2)* |  |  |
| 1. Do shipping and storage containers of cadmium compounds have warning labels as stated in standard? *1910.1027(m)(3)* |  |  |
| 1. Are employees **trained** initially and annually? *1910.1027(m)(4)(ii)* |  |  |

Chronic health issues include kidney dysfunction, lung and prostate cancer. Latency period is 10 years.

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| **Subpart Z – Benzene (1910.1028)** | **Yes/No/NA** | **Comments** |
| Standard applies to all occupational exposures except:   1. Storage, transportation, distribution, dispensing, sale or use of gasoline, motor fuels, or other fuels containing benzene prior to its final discharge from bulk wholesale storage facilities except where dispensed indoors more than 4 hours/day. 2. Loading/unloading operations at bulk wholesale storage facilities which use vapor control systems 3. Storage, transportation, distribution or sale of benzene or liquid mixtures containing more than 0.1% in intact containers or in transportation pipelines while sealed to contain benzene vapors or liquid. 4. Containers and pipelines carrying mixtures with less than 0.1% and natural gas processing plants processing gas with less than 0.1%. 5. *(historical section from late 1980’s showing implementation schedule)* 6. Oil and gas drilling, production and servicing operations 7. Coke oven batteries   (a)(3) - Cleaning and repair of barges and tankers are excluded from certain provisions of the standard  Action Level – 0.5 ppm 8-hr TWA  PEL – 1 ppm 8-hr TWA  STEL – 5 ppm for 15 minutes | | |
| 1. Are regulated areas established where airborne concentrations can reasonably exceed the PEL or STEL? *1910.1028(d)* |  |  |
| 1. Are exposure monitoring determinations made for each job classification in each work area? *1910.1028(e)* |  |  |
| 1. Is initial monitoring completed within 30 days of introduction of benzene into the workplace? *1910.1028(e)(2)* |  |  |
| 1. Is periodic monitoring taking place? *1910.1028(e)(3*)    1. >Action Level but <PEL – annually    2. >PEL – 6 months    3. >STEL – repeated as necessary to evaluate exposures |  |  |
| 1. Are employees notified of all monitoring within 15 working days after receipt of the results? If exceeding the PEL, are corrective actions documented in the notification? *1910.1028(e)(7)* |  |  |
| 1. Are engineering controls and practices in place to reduce exposure below the PEL, and if not to the extent feasible? *1910.1028(f)* |  |  |
| 1. If exposures are above PEL, is there a **written program** in place to reduce employee exposure to or below the PEL? *1910.1028(f)(2)* |  |  |
| 1. Respirators: |  |  |
| * 1. If using air purifying respirators is the air purifying element replaced at the end of its life or at the beginning of each shift, whichever comes first? *1910.1028(g)(2)* |  |  |
| * 1. Is a full facepiece respirator provided for escape with any organic vapor gas mask or any self-contained breathing apparatus? *1910.1028(g)(3)* |  |  |
| * 1. Are organic vapor cartridges or canisters used with powered and non-powered air-purifying respirators? *1910.1028(g)(3)(i)(C)* |  |  |
| * 1. Are canisters rated for the minimum service life of 4 hours at 150 ppm at flow rates of:      1. Non-powered air-purifying respirators – 64 L/min      2. Tight-fitting powered – 115 L/min      3. Loose-fitting powered – 170 L/min |  |  |
| * 1. Are employees allowed to use a respirator with less breathing resistance if unable to wear a negative-pressure respirator? *1910.1028(g)(3)(ii)* |  |  |
| 1. Are employees under medical surveillance if they:    1. > Action Level for 30+ days per year    2. > PEL for 10+ days per year |  |  |
| 1. Are initial medical examinations completed before initial assignment that include: *1910.1028(i)(2)(i)*    1. Detailed occupational history    2. Complete physical exam    3. Laboratory tests    4. Additional test as determined by physician    5. If wearing respirator >30 days per year, special attention to cardiopulmonary system and pulmonary function test |  |  |
| 1. Are annual medical examination provided that include: *1910.1028(i)(3)*    1. Brief history regarding new exposure to potential marrow toxins, changes in medicinal drug use, and the appearance of physical signs related to blood disorders    2. Complete blood count    3. Additional tests as necessary |  |  |
| 1. If employees are using respirators more than 30 days per year, is a pulmonary function test completed every 3 years along with a specific evaluation of the cardiopulmonary system? *1910.1028(i)(3)(iii)* |  |  |
| 1. Are employees provided with a copy of the physician written opinion within 15 days of the examination? *1910.1028(i)(7)(i)* |  |  |
| 1. Are warning signs posted at entrances to regulated areas with the required language? *1910.1028(j)(2)* |  |  |
| 1. Are all employees who have exposure to benzene **trained** initially? Are all employees above action level **trained** annually? *1910.1028(j)(3)* |  |  |

Chronic health issues include anemia and leukemia. Latency period is 1-10 years.

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| **Subpart Z – Bloodborne Pathogens (1910.1030)** | **Yes/No/NA** | **Comments** |
| It is important to note that the definition of "occupational exposure" comprises the reasonable anticipation that the employee will come into contact with these fluids during the course of performing his or her work duties. Therefore, OSHA anticipates that this standard will impact upon all non-health care industries in a similar fashion, i.e., that employees who are designated as responsible for rendering first aid or medical assistance as part of their job duties are to be covered by this standard. This is because it is reasonable to anticipate that an employee designated to render first aid will have occupational exposure to blood or other potentially infectious materials.  Employees who perform "Good Samaritan" acts are not, per se, covered by this standard, although OSHA would encourage an employer to offer follow-up procedures to an employee who experiences an exposure incident as the result of performing a "Good Samaritan" act. This is because such an action does not constitute "occupational exposure", as defined by the standard. The key to this issue is not whether employees have been trained in first aid, but whether they are also designated as responsible for rendering medical assistance. While many workers may be trained in first aid and CPR, not all of these employees would necessarily be designated to render first aid.  Please note that OSHA has recently issued a policy statement specifying that failure to offer the hepatitis B vaccine pre-exposure to persons who render first aid only as a collateral duty, will be considered a technical violation carrying no penalties, provided that a number of conditions are met. | | |
| 1. Is there a **written Exposure Control Plan**? *1910.1030(c)(1)*    1. Exposure determination (paragraph c)    2. Schedule and method of implementation for paragraphs       1. D – Engineering and work practices, PPE, housekeeping, regulated waste, laundry       2. E – HIV and HBV research labs and production facilities       3. F – Hepatitis B vaccination       4. G – Labels, signs, information and training       5. H – Medical records, confidentiality, training records, availability, sharps injury log    3. Procedure for the evaluation of circumstances surrounding exposure incidents |  |  |
| 1. Is the Exposure Control Plan reviewed and updated annually? *1910.1030(c)(1)(iv)* |  |  |
| 1. Is the hepatitis B vaccine and vaccination series available to all employees with exposure within 10 days of first exposure? *1910.1030(f)* |  |  |
| 1. Are hepatitis B vaccination declinations as provided in Appendix A signed? *1910.1030(f)(2)(iv)* |  |  |
| 1. Are employees **trained** initially and annually? *1910.1030(g)(2)(ii)* |  |  |
| 1. Is a sharps injury log established and maintained for the recording of percutaneous injuries from contaminated sharps? Applies to everyone who is required to maintain an OSHA 300 log. LOI from 12-3-2002 – OSHA only requires log to include (1) type and brand of device (2) department or work area (3) explanation of occurrence. No intention to track names. Sample form in compliance directive if needed. *1910.1030(h)(5)* |  |  |

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| **Subpart Z – Methylene Chloride (1910.1052)** | **Yes/No/NA** | **Comments** |
| Is a solvent use for paint stripping, polyurethane foam manufacturing, and cleaning and degreasing.  Action Level – 12.5 ppm as 8-hr TWA  PEL – 25 ppm as 8-hr TWA  STEL – 125 ppm for 15 minutes | | |
| 1. Is initial monitoring completed when employees are exposed to MC? *1910.1052(d)(2)* |  |  |
| 1. Is periodic monitoring completed at the associated frequencies? *1910.1052(d)(3)*  |  |  |  |  |  | | --- | --- | --- | --- | --- | | Scenario | | | Required Monitoring | | | Above Action Level? | Above PEL? | Above STEL? | TWA Monitoring? | STEL Monitoring? | | No |  | No | No | No | | No |  | Yes | No | 3 months | | Yes | No | No | 6 months | No | | Yes | No | Yes | 6 months | 3 months | |  | Yes | No | 3 months | \*See table 1 of standard | |  | Yes | Yes | 3 months | 3 months | | | |
| 1. Are employees notified within 15 days of any monitoring performed? If above PEL or STEL are correction actions and schedule described in written notification? *1910.1052(d)(4)* |  |  |
| 1. Are areas that are above the PEL or STEL regulated and demarcated from the rest of the workplace that alerts employees? *1910.1052(e)* |  |  |
| 1. Are engineering and work practice controls implemented to reduce exposures below the PEL or to the extent feasible? *1910.1052(f)(1)* |  |  |
| 1. Is employee rotation prohibited from trying to achieve compliance with the PEL? *1910.1052(f)(2)* |  |  |
| 1. Is a procedure in place to detect leaks, repair leaks, cleaning area, and proper disposal of material? *1910.1052(f)(3)* |  |  |
| 1. Are half face respirators prohibited from use due to eye irritation and damage? *1910.1052(g)(3)(i)* |  |  |
| 1. Are washing facilities provided capable of removing MC where solutions containing >0.1% MC are used? *1910.1052(i)(1)* |  |  |
| 1. Are eyewash facilities provided in the immediate work area when working with solutions >0.1%? *1910.1052(i)(2)* |  |  |
| 1. Is medical surveillance completed for employees    1. > Action Level 30+ days per year    2. > PEL or STEL 10+ days per year    3. > PEL or STEL where physician identified employee as at risk of cardiac disease or other serious MC-related health condition    4. During an emergency |  |  |
| 1. Is medical surveillance completed prior to initial assignment? *1910.1052(j)(4)(i)* |  |  |
| 1. Is periodic medical surveillance completed? *1910.1052(j)(4)*    1. 45 year and older – every 12 months    2. Younger than 45 years old – every 36 months    3. At termination if >6 months since last exam |  |  |
| 1. Are employees **trained**: *1910.1052(l)*    1. Prior to or at the time of initial assignment?    2. As necessary to ensure understanding.    3. Whenever there are changes in the workplace which increase employee exposure |  |  |

Immediate effects of inhalation exposure may include confusion, light-headedness, nausea, vomiting, and headache. Prolonged or very high levels of exposure may cause eye and respiratory irritation, staggering, unconsciousness, and death. Workers who suffer from angina (chest pain) may experience worsened symptoms of the ailment. Skin and eye exposure to liquid methylene chloride may cause irritation; when not washed off quickly, it could cause burns. Long-term exposure may cause chronic dermatitis as well as permanent nerve and liver damage. Methylene chloride has been shown to cause cancer in laboratory animals and may cause cancer in humans. Methylene chloride is heavier than air and will accumulate in low-lying areas.

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| **Subpart Z – Respirable Crystalline Silica (1910.1053)** | **Yes/No/NA** | **Comments** |
| 1. Is there an assessment completed where there is reasonable exposure above the action level? *1910.1053(d)(1)*  * Action level - 25 µg/m3 * PEL – 50 µg/m3 |  |  |
| 1. Scheduled IH monitoring if   > Action level and < PEL every 6 months  > PEL every 3 months  < Action level sampling only required if new or additional exposures. *1910.1053(d)(3)* |  |  |
| 1. Employees individually notified or results posted in location accessible to all affected employees within 15 days? *1910.1053(d)(6)* |  |  |
| 1. Demarcation of regulated areas above PEL and limited to authorized employees? Sign must be posted at entrances to regulated areas and state specifically as mentioned in standard. *1910.1053(e)* |  |  |
| 1. Is there a **written exposure control plan**? *1910.1053(f)(2)*    1. Description of tasks    2. Description on how to limit exposure    3. Description of housekeeping    4. Annual review of plan |  |  |
| 1. Initial and tri-annual (3 year) medical surveillance for employees above action level more than 30 days/year and within 30 days of first exposure? Medical evaluation also needed if terminated and last exam more than 6 months prior. *1910.1053(i)*    1. Medical and work history    2. Physical examination with emphasis on respiratory system    3. Chest X-ray interpreted and classified by a NIOSH certified B Reader.    4. Pulmonary function test by spirometry technician with current certificate from NIOSH-approved spirometry course.    5. Test for latent tuberculosis infection    6. Other tests deemed appropriate by PLHCP. |  |  |
| 1. Employer shall ensure each employee can demonstrate knowledge and understanding of silica standard (initial only **training**). *1910.1053(j)(3)* |  |  |

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| **Subpart Z – Ionizing Radiation (1910.1096)** | **Yes/No/NA** | **Comments** |
| Includes – alpha rays, beta rays, gamma rays, X-rays, neutrons, high-speed electrons, high-speed protons, and other atomic particles  Excludes – sound or radio waves, visible, infrared or ultraviolet light  Occupational sources include:   * Medical and dental offices (e.g., X-rays). * Hospitals and outpatient treatment centers, including specialty departments in: * Radiology (e.g., medical X-rays and computed tomography (CT) scans). * Nuclear medicine. * Radiation oncology. * Interventional fluoroscopy or radiology. * Cardiac angiography. * Nuclear power plants (reactors) and their support facilities. * Nuclear weapons production facilities. * Industrial operations (e.g., radiography equipment for testing materials or products). * Research laboratories (universities, colleges, and other scientific institutions). * Veterinary facilities. * Manufacturing settings and construction. * Security operations. * Air and space travel and transport (i.e., in-flight) operations, especially at high altitude. * Workplaces with high levels of naturally-occurring radioactive materials (NORM), such as radon. * Worksites with high levels of technologically enhanced naturally-occurring radioactive material (TENORM), such as uranium and other radioactive elements encountered during hydraulic fracturing (commonly known as “fracking”) as part of oil and gas well development. | | |
| 1. Is each radiation area posted with a sign bearing the    1. Radiation caution symbol? *1910.1096(e)(2)*    2. High Radiation Area sign? (>100 millirems in 1 hour) *1910.1096(e)(3)*    3. Airborne Radioactivity Area sign? *1910.1096(e)(4)* |  | Ionizing Radiation |
| 1. Are employees: *1910.1096(i)(2)*    1. Informed of occurrence of radioactive material or radiation?    2. Instructed of safety problems associated with exposures and precautions to minimize exposure?    3. Instructed in applicable provisions of this standard?    4. Advised of reports of radiation exposure? |  |  |
| 1. Is there a copy of the standard and operating procedures posted in conspicuous locations that employees will observe while going to and from their job? *1910.1096(i)(3)* |  |  |

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| **Subpart Z – Hazard Communication (1910.1200)** | **Yes/No/NA** | **Comments** |
| 1. Is there a **written hazard communication program**? *1910.1200(e)*    1. Includes GHS;    2. Labels and other forms of warning;    3. Safety data sheets;    4. Employee information and training;    5. A list of the hazardous chemicals known to be present using a product identifier that is referenced on the appropriate safety data sheet (the list may be compiled for the workplace as a whole or for individual work areas); and,    6. The methods the employer will use to inform employees of the hazards of non-routine tasks (for example, the cleaning of reactor vessels), and the hazards associated with chemicals contained in unlabeled pipes in their work areas. |  |  |
| 1. Is there a list maintained of all the chemicals known to be present showing product identifier on list (name of chemical)? *1910.1200(e)(1)(i)* |  |  |
| 1. Do chemical manufacturers and importers have or developed a SDS for each hazardous chemical? *1910.1200(g)(1)* |  |  |
| 1. Do all employers have a SDS in the workplace for each hazardous chemical? *1910.1200(g)(1)* |  |  |
| 1. Are SDS’s readily accessible during each work shift to employees in their work area(s)? *1910.1200(g)(8)* |  |  |
| 1. Are employees **trained** initially and whenever a new chemical hazard is introduced that they were not previously trained on? *1910.1200(h)* |  |  |

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| **Subpart Z – Chemical Laboratories (1910.1450)** | **Yes/No/NA** | **Comments** |
| Most quality control laboratories are not expected to meet the qualification for coverage under the standard. They are usually adjuncts of production operations which typically perform repetitive procedures for the purpose of assuring reliability of a product or a process. Laboratories that conduct research and development and related analytical work are subject to the requirements of the Laboratory Standard, regardless of whether or not they are used only for support of the manufacturing of CONAP products. LOI – 10-11-1990  Laboratories that use various hazardous chemicals to perform routine, standardized tests which monitor and support production processes are not covered under the standard. Examples of activities are metal analyses on steel and cast iron samples, concentration measurements of coolants for machining, and waste water analyses. Since they are routine, standardized tests which monitor and support production processes and therefore can be considered as quality control. LOI – 8-8-1990  Environmental labs performing analysis on samples for compliance under EPA regulations are covered by the Lab Standard.  Most if not all of these laboratories are not conducting quality control of production processes but are monitoring emissions for environmental control purposes; therefore, they are not exempted from the Laboratory Standard. Such operations would only be considered quality control of production if the result of the monitoring is used as a source of information for process control adjustment. LOI 1-17-1991 | | |
| 1. Employer is required to monitor for employee exposures if reason to believe exposure may be above action levels (or PEL’s). If so, are employee notifications given within 15 days of results? *1910.1450(d)(4)* |  |  |
| 1. **Written chemical hygiene plan** developed? *1910.1450(e)(1)*    1. Readily available to employees    2. Shall include:       1. SOP’s relevant to safety and health considerations       2. Criteria for control measures to reduce employee exposure to hazardous chemicals       3. Requirement for fume hoods that are functioning properly       4. Employee information and training       5. Circumstances where lab operation requires prior approval by employer       6. Medical consultation and medical exams       7. Establishment of chemical hygiene officer       8. Any carcinogens, reproductive toxins, or other substances with high degree of acute toxicity          1. Designated areas          2. Containment          3. Safe removal of contaminated waste          4. Decontamination |  |  |
| 1. Is the hygiene plan reviewed and evaluated annually? *1910.1450(e)(4)* |  |  |
| 1. Are employees **trained** initially and prior to any time a new hazardous chemical is introduced? *1910.1450(f)* |  |  |
| 1. Is medical consultation and examination made available to employees as needed? *1910.1450(g)* |  |  |

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| **State Safety Committees** | | |
| 14 states require an employee/employer safety committee at some or all workplaces in their jurisdiction. Six states (Connecticut, Minnesota, North Carolina, Tennessee, Vermont, and West Virginia) require high hazard/high risk workplaces to have safety committees. This designation is usually based on high EMR, high DART rate, 3 or high workers’ compensation premiums. Alabama requires employers to form a safety committee if requested to do so by an employee. Eight states use establishment size as a criterion for requiring a safety committee, ranging from 5 or more employees (Montana) to 25 or more employees (Connecticut, Nevada, and Minnesota).  Review OSHA’s White Paper from April 2016 on Safety and Health Programs in the States for full details on requirements. | | |
| **Alabama** – if requested by employees |  |  |
| **Connecticut** –   * Self-insured, * >25 employees, or * high incident rate that exceeds average of all industries in State |  |  |
| **Minnesota** –   * >25 employees, or * high incident rate (premium rate in top 25% for all classes by workers compensation or DART rate in top 10% of all rates |  |  |
| **Montana** - >5 employees |  |  |
| **Nebraska** – All public and private employers |  |  |
| **Nevada** –   * >25 employees, or * manufacture explosives * Self-insurance groups |  |  |
| **New Hampshire** - >15 employees |  |  |
| **New York** – Group dividend plans |  |  |
| **North Carolina** –   * High incident rate (EMR of 1.5 or greater), * >10 employees |  |  |
| **Oregon** – all public and private employers. >10 need committees, >10 need meetings |  |  |
| **Tennessee** – all public and private employer subject to Workers’ Compensation Law with high incident rate of experience modification factor equal or greater than 1.20 |  |  |
| **Vermont** – High incident rate |  |  |
| **Washington** - >10 employees at same location on the same shift |  |  |
| **West Virginia** – High incident rate. West Virginia Code 23-2B-2 (2015) provides that, “[f]or any employer whose experience modification factor exceeds the criteria established by the board of managers, the executive director may require the employer to establish a safety committee composed of representatives of the employer and the employees of the employer.” |  |  |

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| **City of Wichita – Code of Ordinances Title 15 Fire Protection** | **Yes/No/NA** | **Comments** |
| City of Wichita adopts and references the International Fire Code (IFC)  \*adopted 2018 version on 5-11-2021 | | |
| 1. Required operational permit for facilities with liquefied petroleum (LP) (e.g. propane) powered vehicles and storage of LP? Exception for containers less than 125 gallons or aggregate less than 125 gallons. $85 fee. *15.01.050 – Chapter 1, Section 105.6.27* |  |  |
| 1. Required operational permit for facilities with storage of flammable and hazardous liquids over 5 gallons of Class 1 flammables. Class II and Class IIIA in excess of 25 gallons. *105.6* |  |  |
| 1. Facilities with sprinkler systems and fire alarm systems require a Knox Box that is mounted on address side of the building. *506.1* |  |  |
| 1. Facilities with flammable and combustible liquids must have a NFPA 704 placard mounted on address side of the building. *5003.5* |  |  |
| 1. Emergency lighting must work on backup power. *1006.3* |  |  |
| 1. Flammable liquids over 10 gallons total must be stored in a flammable liquid storage cabinet. *5704.3.4.4* |  |  |

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| **State of Indiana OSHA** | **Yes/No/NA** | **Comments** |
| **Overview**   * Initial Approval: March 6, 1974 * State Plan Certification: October 6, 1981 (46 FR 49119) * 18(e) Final Approval: September 26, 1986 (51 FR 34215)   The Indiana Occupational Safety and Health Administration (IOSHA) is part of the Indiana Department of Labor. The main office is located in Indianapolis.  **Coverage** - The Indiana State Plan applies to all private sector workplaces in the state with the following exceptions:   1. Maritime employment, including shipyard employment, marine terminals, and longshoring; 2. Contract workers and contractor-operated facilities engaged in United States Postal Service mail operations; 3. The enforcement of the field sanitation standard (29 CFR 1928.110) and the enforcement of the temporary labor camps standard (29 CFR 1910.142) with respect to any agricultural establishment where workers are engaged in "agricultural employment" within the meaning of the Migrant and Seasonal Agricultural Worker Protection Act, 29 USC 1802(3) – regardless of the number of workers – including workers engaged in hand packing of produce into containers, whether done on the ground, on a moving machine, or in a temporary packing shed, except that Indiana retains enforcement responsibility over agricultural temporary labor camps for workers engaged in egg, poultry, or red meat production, or the post-harvest processing of agricultural or horticultural commodities; 4. Any hazard, industry, geographical area, operation, or facility over which the State Plan is unable to effectively exercise jurisdiction for reasons not related to the required performance or structure of the plan; and 5. All working conditions of aircraft cabin crewmembers onboard aircraft in operation.   The Indiana State Plan also applies to state and local government employers. It does not apply to federal government employers including the United States Postal Service. Federal OSHA covers the issues not covered by the Indiana Plan except for the enforcement of the field sanitation and temporary labor camp standards, as described above, which is the responsibility of the Wage-Hour Division of the U.S. Department of Labor. In addition, federal OSHA retains enforcement of the anti-retaliation provision of the Occupational Safety and Health Act of 1970, Section 11(c), 29 USC 660(c), with respect to the private sector. IOSHA also investigates private and state and local government workplace retaliation cases under a provision analogous to Section 11(c).  A brief summary of the Indiana State Plan is included in the Code of Federal Regulations at [29 CFR 1952.17](https://www.osha.gov/laws-regs/regulations/standardnumber/1952/1952.17).  **State Plan Standards** - IOSHA adopts all OSHA standards and regulations except it has a unique excavations standard.  The Indiana Occupational Safety Standards Commission (IOSSC) is a commission created by the legislature to promulgate, modify or revoke safety and health standards in Indiana and to hear and determine applications for temporary and permanent variances from those standards. The members of the Indiana Occupational Safety Standards Commission are appointed by the Governor. The Commission is authorized under [Indiana Code 22-8-1.1](http://www.in.gov/legislative/ic/code/title22/ar8/ch1.1.html), the Indiana Occupational Safety and Health Act, specifically beginning at Indiana Code 22-8-1.1-7. The rules and procedures are found in [Title 620](https://www.in.gov/dol/iosha/indiana-occupational-safety-standards-commission) of the Indiana Administrative Code.  **Enforcement Programs** - The Industrial Compliance Division of IOSHA conducts safety and health inspections in all places of employment within the State of Indiana with the exception of those covered by IOSHA's Construction Safety Division. IOSHA conducts inspections in accordance with established priorities including reports of imminent dangers, fatalities and catastrophes, and complaints from workers or their representatives, and referrals from other agencies. IOSHA's Whistleblower Protection Unit enforces the whistleblower protection provision of the Indiana Occupational Safety and Health Act. In addition, IOSHA conducts unannounced inspections of private sector and state and local government general industry and construction employers in accordance with current enforcement program priorities. For more information, please visit the Indiana State Plan website. | | |
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| **State of Michigan OSHA (MIOSHA)** | **Yes/No/NA** | **Comments** |
| **Overview**   * Initial Approval: October 3, 1973 * MIOSH Act 154 of 1974 * Certified in 1980   Three Divisions   * 1. General Industry   2. Construction (Asbestos program)   3. Consultation Education and Training   MIOSHA has not yet adopted Federal OSHA’s penalty structure in 9-1-2016. Max penalty is still $7,000 for other-than-serious, serious, and failure-to-abate (per day). No pending legislation action pending (as of Dec 2022).  Looks back limited for General Industry to 5 years and Construction to 3 years. | | |
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**FIELD INSPECTION**

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| **Employee Training and Medical** | EAP trg. (Initial & plan change) | Audiogram (w/in 6 mo and annual) | Hearing trg. (before exp. & annually) | Respiratory trg. (before use & annually) | Respirator medical exam (one time) | Respirator fit test (before use & annually) | Respirator voluntary (Appendix D) | Confined space rescue (annual practice) | Confined space duties (initially & duty change) | LOTO Authorized (initially & new procedures) | LOTO Affected (one time) | Fire Extinguishers (initially and annually) | Forklift (prior to operation & every 3 years) | Access To Medical (initially & annually) | BBP – First aid/AED/CPR (initial & annually) | Hazard Communication (initially) |
| **Employee Name** |
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| **Chemical Inventory – Chemicals used in facility** | **SDS?** | **Year / In GHS format?** |
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**General Duty Clause Citations**

* Boilers inspected (annually) and maintained
* Chemical storage of incompatible materials (e.g. strong acids/bases together, explosives next to flammables, etc.)? OSHA references NFPA 1 Chapter 60 in citation.
* Combustible dust hazards or other explosive atmosphere hazards present.
* Crane/hoists – no safety latch in use
* Ergonomics poor at workstations or on the job
* Forklift drivers
  + Not wearing seat belts while in use
  + Cell phone being used while operating
* Heat stress for employees not controlled or mitigated
* High visibility clothing provided per ANSI 107?
  + Class 1 – off-road environments with moving equipment/vehicles and struck-by hazards;
  + Class 2/3 – Roadway hazards traffic with moving equipment/vehicles.
* Industrial storage racks
  + Load limits posted
  + Secured in place when possible to tip due to forklift use
  + In good condition
  + Workstations located underneath racking
* Structural damage to building causing struck by hazard

**Supbart D – Walking / Wokring Surfaces (1910.21 thru 1910.30**

General (22)

* Hoses, cords, and other trip hazards in areas that are not in use
* Combustible dust depth levels in excess of 1/8”

Portable ladders (23)

* Rubber on feet
* Structural damage

Scaffolding (27)

* Inspections before each work shifts and after any occurrence that could affect structural integrity

Duty to have fall protection (28)

* Unguarded holes in floor
* Self-closing swinging gates on all fixed ladders greater than 4 feet
* Stair rail or hand rail system if 4 risers or more
* Side rails not extending 42” past platform

**Subpart E – Exit Routes and Emergency Planning (1910.33 thru 1910.39)**

* Explosive or flammable liquids not stored near exits or travel paths (37)
* Emergency exit signs and lighting provided for egress? 1910.37(b)
* Adequate number of exit pathways
* Blocked exits
* Emergency lights in proper working order at all times?
* Doorways that could be confused for emergency exits labeled as “not an exit” or otherwise labeled? (37)

**Subpart F -** **Vehicle-Mounted Elevating and Rotating Work Platforms (1910.66 thru 1910.68)**

Personal fall arrest or travel restraint systems used for workers in aerial lifts? (67)

**Subpart G – Occupational Health and Environmental Control (1910.94 thru 1910.98)**

* Abrasive blasting enclosures ventilated to minimize visible spurts of dusts? *1910.94(a)(3)*
* Copy of Occupational Noise Exposure standard posted in workplace (1983 requirement)? *1910.95(l)(1)*

**Subpart H – Hazardous Materials (1910.101 thru 1910.126)**

* Compressed gas cylinders
  + Stored with caps in place when not in use (101)
  + Secured on upper 2/3 of cylinder (101)
* Flammable liquid storage rooms provided with either a 4-inch liquid tight sill or at least 4 inches below surrounding floor (*1910.106(d)(4)(i)*
* Flammable liquid storage rooms provided with self-closing doors? 1910.106(d)(4)(i)
* Flammable liquids in metal containers grounded and bonded uring transfer (106)
* Spray booths must have 3 feet of clear space from storage or combustible materials on all sides for cleaning purposes *1910.107(b)(9)*
* Spray (paint) booths have floors that are non-combustible (107)

|  |
| --- |
| How much flammable liquid is stored outside of storage room or storage cabinet in one fire area? *1910.106(e)(2)(ii)(B)*   * Category 1 – 25 gallons * Category 2, 3, or 4 – 120 gallons in containers * Category 2, 3, or 4 – 660 gallons in single portable tank |
| How much flammable liquid is stored in each flammable liquid storage cabinet: *1910.106(d)(3)(i)*   * + Category 1, 2, or 3 – 60 gallons   + Category 4 – 120 gallons |
| **Category 1** shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point at or below 95 °F (35 °C). Maximum storage outside of cabinet or flammable liquid storage room in a building or any one fire area – 25 gallons.  **Category 2** shall include liquids having flashpoints below 73.4 °F (23 °C) and having a boiling point above 95 °F (35 °C). Maximum storage outside of cabinet or flammable liquid storage room in a building or any one fire area – 120 gallons.  **Category 3** shall include liquids having flashpoints at or above 73.4 °F (23 °C) and at or below 140 °F (60 °C). When a Category 3 liquid with a flashpoint at or above 100 °F (37.8 °C) is heated for use to within 30 °F (16.7 °C) of its flashpoint, it shall be handled in accordance with the requirements for a Category 3 liquid with a flashpoint below 100 °F (37.8 °C). Maximum storage outside of cabinet or flammable liquid storage room in a building or any one fire area – 120 gallons.  **Category 4** shall include liquids having flashpoints above 140 °F (60 °C) and at or below 199.4 °F (93 °C). When a Category 4 flammable liquid is heated for use to within 30 °F (16.7 °C) of its flashpoint, it shall be handled in accordance with the requirements for a Category 3 liquid with a flashpoint at or above 100 °F (37.8 °C). Maximum storage outside of cabinet or flammable liquid storage room in a building or any one fire area – 120 gallons.  A Fire area shall mean an area of a building separated from the remainder of the building by construction having a fire resistance of at least 1 hour and having all communicating openings properly protected by an assembly having a fire resistance rating of at least 1 hour. |

* Emergency eyewash/shower station in close proximity to all dip tanks (includes parts cleaners (sink-on-drum)) 1910.124(g)(2)

**Subpart I – Personal Protective Equipment (1910.132 thru 1910.138)**

* Eye and face protection when exposed to flying particles, molten metal, liquid chemicals, acids or caustic liquids, chemical gases or vapors, or potentially injurious light radiation? (133)
* SCBA respirators, emergency use, and emergency escape-only respirators inspected monthly? 1910.134(h)(3)
* All air compressors for breathing air have equipment to: 1910.134(i)
  + Prevent entry of contaminated air into the air-supply system;
  + Minimize moisture content;
  + Have suitable in-line air-purifying sorbent beds and filters to further ensure breathing air quality. Sorbent beds and filters shall be maintained and replaced or refurbished periodically following the manufacturer's instructions;
  + Have a tag containing the most recent change date and the signature of the person authorized by the employer to perform the change. The tag shall be maintained at the compressor.
* Is air compressor oil lubricated?
  + For compressors that are not oil-lubricated, the employer shall ensure that carbon monoxide levels in the breathing air do not exceed 10 ppm.
  + For oil-lubricated compressors, the employer shall use a high-temperature or carbon monoxide alarm, or both, to monitor carbon monoxide levels. If only high-temperature alarms are used, the air supply shall be monitored at intervals sufficient to prevent carbon monoxide in the breathing air from exceeding 10 ppm.
* Breathing airline have unique fittings (134)
* Respirators properly stored in bags or containers. 134(h)(2)
* Employees wear protective helmets when working in areas where there is potential or injury to the head from falling objects? 1910.135(a)(1)
  + Expired hard hats (typically 5 years for shell and 12 months for suspension)
* Employees use protective footwear when working in areas where there is danger of foot injuries due to falling or rolling objects or objects piercing the sole? 1910.136(a)
* Employees wear appropriate hand protection when exposed to hazards such as absorption of harmful substances, severe cuts or lacerations, severe abrasions, punctures, chemical burns, thermal burns, and harmful temperature extremes. 1910.138(a)

**Subpart J – General Environmental Controls (1910.141 thru 1910.147)**

* Employee consuming food and beverages in areas exposed to toxic materials (141)
* No using refrigerators for both chemicals and food. 141(g)(4)
* Use of danger/caution tape in high hazard work areas (145)
* Wet floor signs in use (145(c)(2)(i))
* Confined spaces labeled (146)
* LOTO
  + No shared used of locks
  + Not leaving key in lock
  + Not using LOTO lock for normal use in other areas

**Subpart K – Medical and First Aid (1910.151 thru 1910.152)**

* Safety and eyewash stations
  + Inspected weekly
  + Blocked access
  + Located next to electric battery charging stations that employees are exposed to acid when filling. 151(c)
* First aid kit materials
  + Adequate for hazards in facility
  + Expired

**Subpart L – Fire Protection (191.155 thru 1910.165)**

* Fire extinguisher mounted at correct height (<5 feet if less than 40 lbs and <3 feet if more than 40 lbs, 4 inches off ground level) 157(c)(1)

**Subpart N – Materials Handling and Storage (1910.176 thru 1910.184)**

* Labels on levers to forklifts. (178(a)(6))
* No use of lifting platforms without written approval from manufacturer (178(a)(4) and (5))
* Using wheel chocks or dock-locks to secure trailers. Only need 1 method to secure. (178(k)(1))
* Using park break (178(m)(5)(i))
* Leaving load elevated on forklift (178(m)(5))
* Seatbelt in bad condition (178(p)(1))
* Non-engineered lifting devices on crane (179)
* No load rating on crane posted (179(b)(5))
* Labels on control levers on cranes (179(g)(1)(v))
* Knots tied in slings (184(c)(2))
* Damaged slings (184(i)(9))

**Subpart O – Machinery and Machine Guarding (1910.211 thru 1910.219)**

* Blades of fans less than 7 feet maximum opening of ½” (212(a)(5))
* Securely mounted machines if designed to be in fixed location (212(a)(6))
  + Drill presses, abrasive wheel grinders
* Abrasive Wheel Grinders –1/4” top guard and 1/8” wheel rest (215(a)(4) and (b)(9))
* Point of operation
  + Drill presses
  + Lathes
  + Mills
  + Press brakes
  + Table saws

**Subpart P – Hand and Portable Powered Tools and Other Hand-Held Equipment (1910.241 thru 1910.244)**

* Modified air nozzles on compressed air lines (242(b))
* Is the floor jack marked with the rated load capacity? (244)

**Subpart Q – Welding, Cutting and Brazing (1910.251 thru 1910.255)**

* No hot work on combustible floors (252(a)(2)(v))
* Use of weld shields, screens, or use of appropriate eyewear for employees around hot work (252(b)(2)(iii))
* Damaged cables on welding leads (254(d)(9)(iii))

**Subpart S – Electrical (1910.301 thru 1910.399)**

* Using power strips in series or with extension cord (303(b)(2))
* Using extension cords in series (303(b)(2)
* Material storage in front of electrical equipment within 3 feet (303(g)(1))
* Warning sign posted on electrical rooms (303(g)(2)(iii))
* GFCI outlets within 6 feet of sinks (304(b)(3))
* Missing ground plugs on cords (304(g)(5))
* Extension cords being used in lieu of permanent wiring (305(g)(1)(iv)(A))
* Flexible cords being permanently affixed to building structure (305(g)(1)(iv)(D))
* Electrical equipment not approved for hazardous (classified) locations (307(c)(2)(i))
* Damaged extension cords (334(a)(2)(ii))

**Subpart Z – Toxic and Hazardous Substances (1910.1000 thru 1910.1450)**

* Secondary chemical containers missing identification and hazard identification (1200(f)(6))

**Recommended Practices**

* Electrical
  + Keeping metal ladders and chairs out of electrical rooms
* Emergency plan drills or tabletop exercises
* Fall protection
  + Storing SRL’s in retracted position to prevent fatigue of retraction springs
* Fire extinguishers – placing cover on outdoor extinguishers for protection
* Hot work – providing flame resistant or non-melting material uniforms or creating policy eliminating meltable fiber clothing
* Ladders
  + Doing annual documented inspection of all portable ladders
* Lighting
  + Doing surveys
  + Adding additional lighting
* SDS’s
  + Backup systems if using web based service during power failures