

OSHA update - New Emphasis Programs

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National Emphasis Programs

- Combustible Dust
- Covid (New)
- Hazardous Machinery Amputation
- Heat (new)
- Hexavalent Chromium
- Lead
- Primary Metal Industries
- Process Safety Management
- Shipbreaking
- Silica
- Trenching & Excavation



Combustible Dust

NEP Results

Inspections Conducted

326 Total Inspections

Total Violations Issued

1,187 Total Violations

% Total Violations Cited As Serious

% Total Violations Cited As S,W,R,FTA, Unclass

Avg. Number Violations Issued Per Initial Inspection

% Inspections In-Compliance

(Insp W/O Violations & Closed)

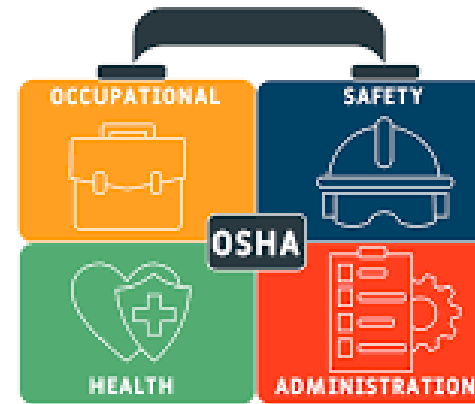
OSHA May 29 2022

- Doug Parker - OSHA
- Will announce extension of covid emphasis program.
- Hospitalizations are increasing in the last months.
- We need to make presence known in healthcare for covid.
- Incompliance rate is not an issue.
- We will focus on infectious disease standard in the future.



Contents COVID 19 ETS

- 1910.502 Healthcare
- 1910.504 Mini Respiratory Protection Program
- 1910.505 Severability
- 1910.509 Incorporation by Reference



Scope

- Most dentist offices are covered by the standard's exemption for non-ambulatory health-care providers because they perform screening, according to an American Dental Association statement provided to Bloomberg Law.



CDC Schools

- Covid Hazard Assessment Plan
- Managing the Sick
- Separate the sick
- Trained staff
- PPE including N95, gown, gloves, face shield or goggles if within 6 feet.
- Procedure for transport of the sick



Program



Model COVID-19 Prevention Program (CPP)

The employer must develop and implement a COVID-19 plan for each workplace.

[1910.502\(c\)\(1\) & \(c\)\(2\)](#)

With some exceptions, all employers and places of employment are required to establish and implement an effective written COVID-19 Prevention Program (CPP) pursuant to an Emergency Temporary Standard in place for COVID-19 (California Code of Regulations (CCR), Title 8, section 3205(c)). Cal/OSHA has developed this model program to assist employers with creating their own unique CPP tailored to their workplace.

Employers are not required to use this program. Employers may create their own program or use another CCP template. Employers can also create a written CCP by incorporating elements of this program into their existing Injury and Illness Prevention Program (IIPP), if desired. Cal/OHA encourages employers to engage with employees in the design, implementation and evolution of their COVID-19 Prevention Program.

Using this model alone does not ensure compliance with the emergency temporary standard. To use this model program effectively, the person(s) responsible for implementing the CPP should carefully review:

- All of the elements that may be required in the following CCR, Title 8 sections:
 - 3205, COVID-19 Prevention
 - 3205.1, Multiple COVID-19 Infection and COVID-19 Outbreaks
 - 3205.2, Major COVID-19 Outbreaks
 - 3205.3, Prevention in Employer-Provided Housing
 - 3205.4, COVID-19 Prevention in Employer-Provided Transportation to and from Work
 - The four **Additional Considerations** provided at the end of this program to see if they are applicable to your workplace.

Employers may also develop a single comprehensive plan in instances where employees are performing the same task(s) at different facilities as long as any required site-specific information is included,” the directive states.

COVID-19 Safety Coordinators

- The employer must designate one or more workplace COVID-19 safety coordinators
- 1910.502(c)(3)



Hazard Assessment

- The employer must conduct a workplace-specific hazard assessment to identify potential workplace hazards related to COVID-19.
- 1910.502(C)(4)(i)

**FIRST 3 STEPS IN
CONDUCTING A COVID-19
HAZARD ANALYSIS**

ZURICH

- 1** Identify the underlying **HAZARD**.
- 2** Consider what might **TRIGGER** a workplace event.
- 3** Think of **EVENTS** that could result if underlying hazard is triggered.

Employee Involvement

- The employer must seek the input and involvement of non-managerial employees and their representatives, if any, in the hazard assessment and the development and implementation of the COVID-19 plan.
- 1910.502(C)(5)



Monitoring

- The employer must monitor each workplace to ensure the ongoing effectiveness of the COVID-19 plan and update it as needed.
- 1910.502(C)(5)



Plan not Address Hazards



- COVID-19 plan did not address the hazards identified by the workplace-specific hazard assessment, and did not include policies and procedures to minimize the risk of transmission of COVID19 for each employee
- 1910.502(c)(7)(i)
- Citation – no barrier or physical distancing



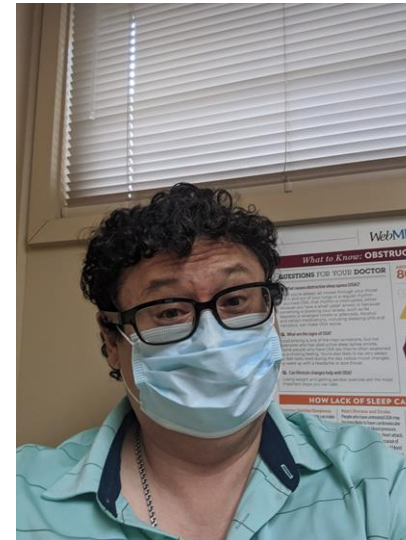
Patient Screening

- In settings where direct patient care is provided, the employer must
- Limit and monitor points of entry to the setting.
- Screen and triage all clients, patients, residents, delivery people and other visitors, and other non-employees entering the setting.
- 1910.502(d)(1)



Follow CDC

- Implement other applicable patient management strategies in accordance with CDC's "COVID-19 Infection Prevention and Control Recommendations" (incorporated by reference, § 1910.509).
- 1910.502(d)(3)



Follow CDC

- Employers must develop and implement policies and procedures to adhere to Standard and Transmission-Based Precautions in accordance with CDC's "Guidelines for Isolation Precautions" (incorporated by reference, § 1910.509).
- 1910.502(e)



Face Masks

- The employer must ensure a facemask is worn by each employee over the nose and mouth when indoors and when occupying a vehicle with other people for work purposes.
- 1910.502(f)(1)

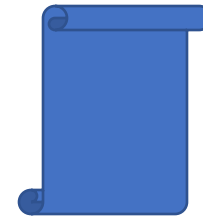


Face Masks Exceptions

- Alone
- Eating when protected by barrier or 6 feet distance
- Wearing a respirator
- Needing to see mouth for communication
- Cannot wear a face mask due to disability
- Hazard to wear it
- 1910.502(f)(1)



Respirators and PPE



- When employees have exposure to a person with suspected or confirmed COVID-19, the employer must provide:
- (i) a respirator to each employee and ensure that it is provided and used in accordance with § 1910.134 and
- (ii) gloves, an isolation gown or protective clothing, and eye protection to each employee
- 1910.502(f)(2)
- Citation unvaccinated CNAs with suspect Covid patient



Aerosol-generating Procedures On A Person with suspected or confirmed COVID-19.

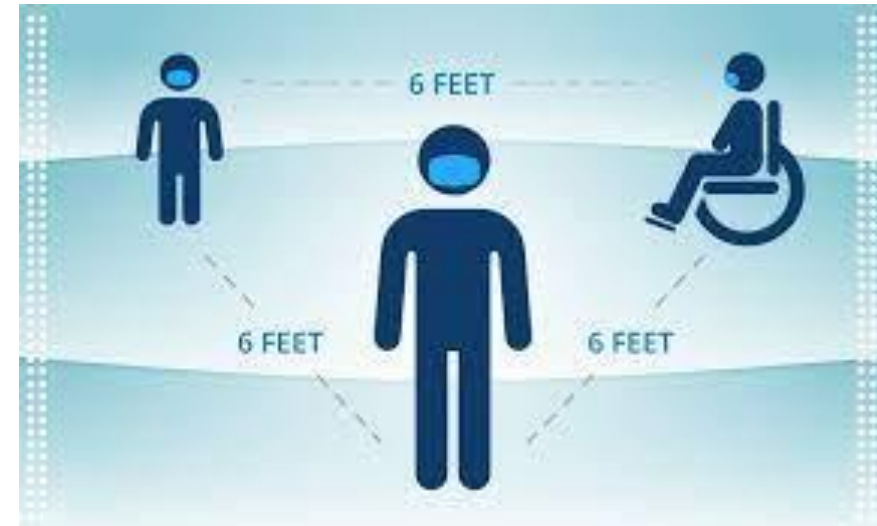
- (1) The employer must limit the number of employees present during the procedure to only those essential for patient care and procedure support.
- (2) The employer must ensure that the procedure is performed in an existing Airborne Infection Isolation Rooms (AIIR), if available.
- (3) After the procedure is completed, the employer must clean and disinfect the surfaces and equipment in the room or area where the procedure was performed.
- 1910.502(g)



Physical Distancing



- The employer must ensure that each employee is separated from all other people by at least 6 feet when indoors unless the employer can demonstrate that such physical distancing is not feasible for a specific activity
- 1910.502(h)(1)
- Citation – unvaccinated CAN and RN spend in excess of 15 minutes per shift in close proximity (less than 6 feet), performing data entry tasks, phone calls, and giving end of shift reports.



Physical Barriers



- where each employee is not separated from all other people by at least 6 feet of distance, the employer must install cleanable or disposable solid barriers, except where the employer can demonstrate it is not feasible.
- 1910.502(i)
- Citation – no barriers at nurse's station



Ventilation



- All air filters are rated Minimum Efficiency Reporting Value (MERV) 13 or higher, if compatible with the HVAC system(s).
- 1910.502(k)(1)(iii)
- This section does not require installation of new HVAC systems or AIRs to replace or augment functioning systems.
- Citation – using Merv 8 filters

TABLE 1: APPLICATION GUIDELINES

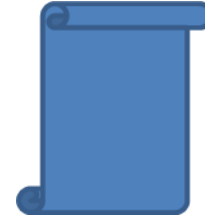
| MERV Std 52.2 | Intended Dust Spot Efficiency Std 52.1 (1) | Average Arrestance | Particle Size Ranges | Typical Applications | Typical Filter Type |
|---------------|--|--------------------|----------------------|--|---|
| 1 - 4 | <20% | 60 to 80% | > 10.0 µm | Residential/Minimum Light Commercial/ Minimum Equipment Protection | Permanent / Self Charging (passive) Washable / Metal, Foam / Synthetics Disposable Panels Fiberglass / Synthetics |
| 5 - 8 | <20 to 60% | 80 to 95% | 3.0-10.0 µm | Industrial Workplaces Commercial Better / Residential Paint Booth / Finishing | Pleated Filters Extended Surface Filters Media Panel Filters |
| 9 - 12 | 40 to 85% | >90 to 98% | 1.0-3.0 µm | Superior/Residential Better/Industrial Workplaces Better/Commercial Buildings | Non-Supported / Pocket Filter / Rigid Box Rigid Cell / Cartridge V-Cells |
| 13 - 16 | 70 - 98% | >95 to 99% | 0.30-1.0 µm | Smoke Removal General Surgery Hospitals & Health Care Superior/ Commercial Buildings | Rigid Cell / Cartridge Rigid Box / Non-Supported / Pocket Filter V-Cells |

Note: This table is intended to be a general guide to filter use and does not address specific applications or individual filter performance in a given application. Refer to manufacturer test results for additional information.

(1) ANSI/ASHRAE 52.1 ranges are provided for reference only. The ANSI/ASHRAE 52.1 Standard was discontinued as of January 2009.

Notification Of Employees Of COVID-19 Exposure

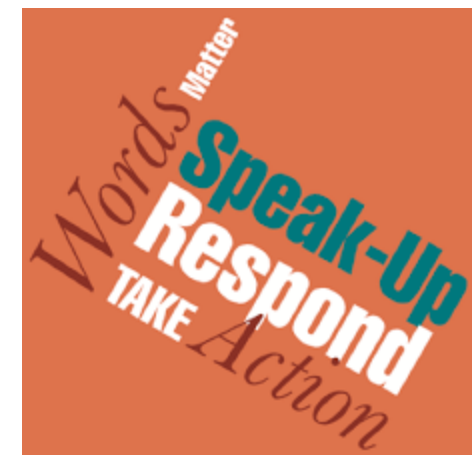
- Notify each employee who was not wearing a respirator and any other required PPE and has been in close contact with that person in the workplace.
- The notification must state the fact that the employee was in close contact with someone with COVID-19 along with the date(s) that contact occurred.
- 1910.502(l)(3)(i)(A)
- must **not** include any employee's name, contact information (e.g., phone number, email address), or occupation.
- Per the Federal Register the ETS does not require notification or removal employee who was wearing respirators along with other required PPE at the time they had close contact with the person who had COVID19



Antiretaliation



- Employees have a right to the protections required by this section; and
 - Employers are prohibited from discharging or in any manner discriminating against any employee for exercising their right to the protections required by this section, or for engaging in actions that are required by this section.
-
- 1910.502(o)(1)



COVID-19 Log

The OSHA COVID-19 Healthcare Emergency Temporary Standard (ETS) requires employers to keep a COVID-19 Log if they have more than 10 employees on [the date the ETS is published in the Federal Register] (the effective date of the ETS) (See 29 CFR 1910.502(q)). Employers are required to record on the COVID-19 Log each instance of an employee being confirmed COVID-19 positive (i.e., case that tested positive or was diagnosed by a licensed healthcare provider), whether it was contracted at work or elsewhere.

(Employers may use this form or any other form containing similar information)

Name of Business/Employer:

Address: _____

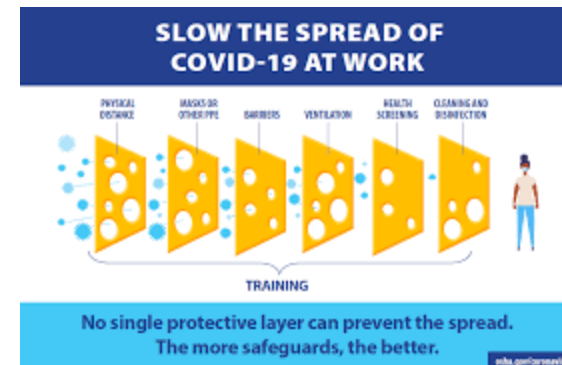
Name and Contact information of Employer's Contact Person:

| Employee Name and Occupation (Job Title) | Employee Contact Information (Address, Phone Number, or email address) | Employee Work Location (Address, Department, Floors, or Room Numbers) | Most Recent Day the Employee Was Present in the Workplace (Date) | Date of COVID-19 Diagnosis or Positive Test for COVID-19 | Date of Onset of Symptoms (if Applicable) | Brief Description or Additional Information |
|--|--|---|--|--|---|---|
| | | | | | | |
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Recordkeeping



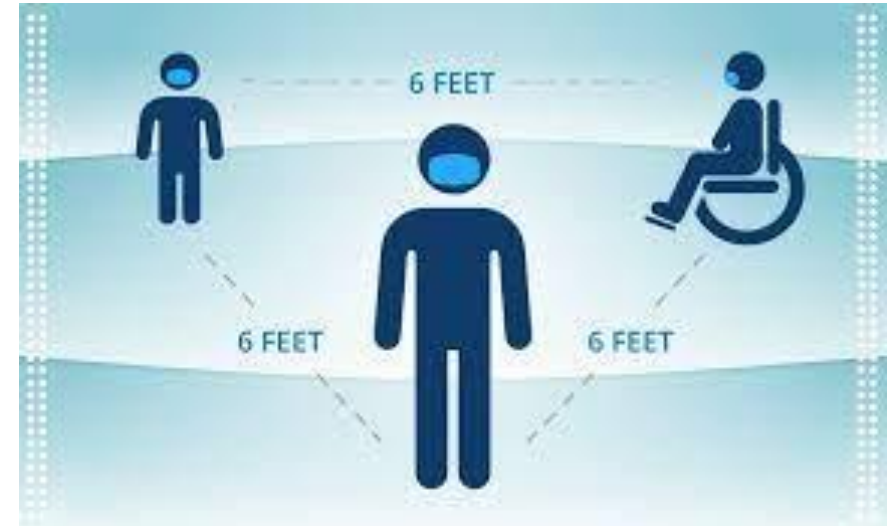
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- [1910.502\(q\)\(2\)\(ii\)\(A\)](#)



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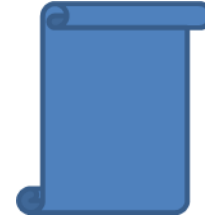
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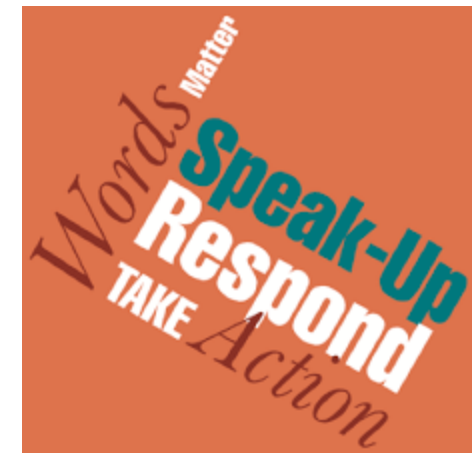
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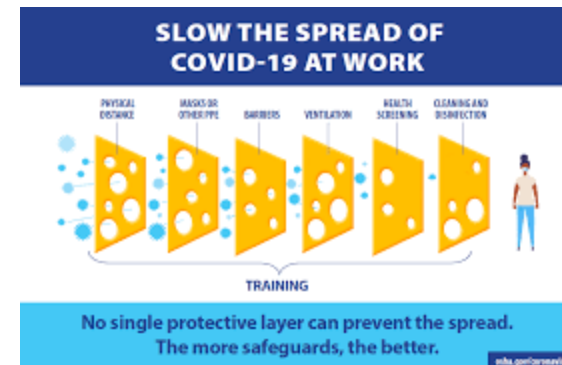
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- [1910.502\(q\)\(2\)\(ii\)\(A\)](#)



Mini Respiratory Program

- Can reuse filtering facepiece if in good shape.
- 5 days in a paper bag between reuse
- Visual check
- User seal check
- Hand Hygiene
- Max 5 days worn.
- 1910.502(f)(4) -

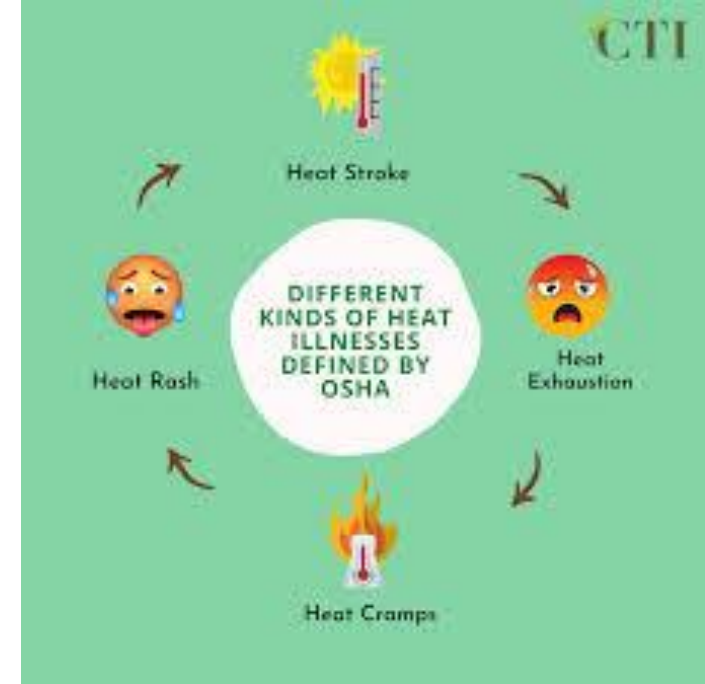


Mini Respiratory Program

| KEY PROGRAM ELEMENT ¹ | MINI RPP ² (1910.504) | NORMAL RPP ³ (1910.134) |
|----------------------------------|-------------------------------------|---------------------------------------|
| Medical Evaluation | | ✓ |
| Fit Testing | | ✓ |
| Written Program | | ✓ |
| User Seal Checks | ✓ | ✓ |
| Training | ✓ | ✓ |

OSHA

- 500 Heat Inspections in July
- Working on a Heat Standard
- Prioritize inspections of heat-related complaints
- Instruct CSHOs, to conduct an intervention or open an inspection when they observe employees performing strenuous work in hot conditions.
- Expand the scope of other inspections to address heat-related hazards where worksite conditions or other evidence indicates these hazards may be present.



Heat Calls

- Dear XXXXX:
- The Occupational Safety and Health Administration (OSHA) received a notice of alleged workplace hazard(s) at your worksite at: ADDRESS
- We notified you, by telephone, of these alleged hazards on July 5, 2022.
- The specific nature of the alleged hazards is as follows:
- Employees are exposed to heat hazards on the factory floor in the oven and dryer area. Employer has not implemented an effective heat illness prevention plan. Applicable OSHA Standard: 5(a)(1) of OSH Act.
- We have not determined whether the hazards, as alleged, exist at your workplace and we do not intend to conduct an inspection at this time. However, since allegations of violations and/or hazards have been made, we request that you immediately investigate the alleged conditions and make any necessary corrections or modifications.
- Please advise me in writing, no later than July 12, 2022 of the results of your investigation. You must provide supporting documentation of your findings, including any applicable measurements or monitoring results, and photographs/video which you believe would be helpful, as well as a description of any corrective action you have taken or are in the process of taking, including documentation of the corrected condition.

Heat Response

- On July 6th we received the OSHA complaint number xxx. We investigated the allegations and established the following corrective actions.
- On July 7th & 8th , we reviewed our Heat Illness Prevention Program with the employees at our pre-shift safety meetings and submit the sign in sheets.
- Corrective actions:
 - 1. Notice of Alleged Workplace Hazard has been posted and will remain posted for the required 10-day period and covered with our Steering/Safety Committee as well.
 - 2. Increase signage regarding heat awareness.
 - 3. Add Heat Illness Training to New Hire Orientation.
 - 4. Assign a specific supervisor or their designee, each shift, during hot days for leadership of the Heat Illness Prevention Program.
 - 5. Adding an additional Heat Stress training throughout the year.

CAL-OSHA

- Trigger 95 degrees
- Observing employees for alertness and signs or symptoms of heat illness.
- Mandatory buddy system, or
- Regular communication with sole employee such as by radio or cellular phone,
- Designating one or more employees on each worksite as authorized to call for emergency medical services
- Reminding employees throughout the work shift to drink plenty of water.
- Pre-shift meetings before the commencement of work to review the high heat procedures, encourage employees to drink plenty of water, and remind employees of their right to take a cool-down rest when necessary.
- When temperatures reach 95 degrees or above, the employer shall ensure that the employee takes a minimum ten minute net preventative cool-down rest period every two hours.

Region V Local Emphasis Programs

- Building Renovation/Rehab and Demolition
- Powered Industrial Vehicles
- Fall Hazards
- Federal Agencies
- Grain Handling Facilities
- High Rise Building Construction
- Food Manufacturing (new)
- Lead
- Maritime Industries
- Noise (New)
- Transport Tank Cleaning (new)
- Wood Pallet Manufacturing Industry



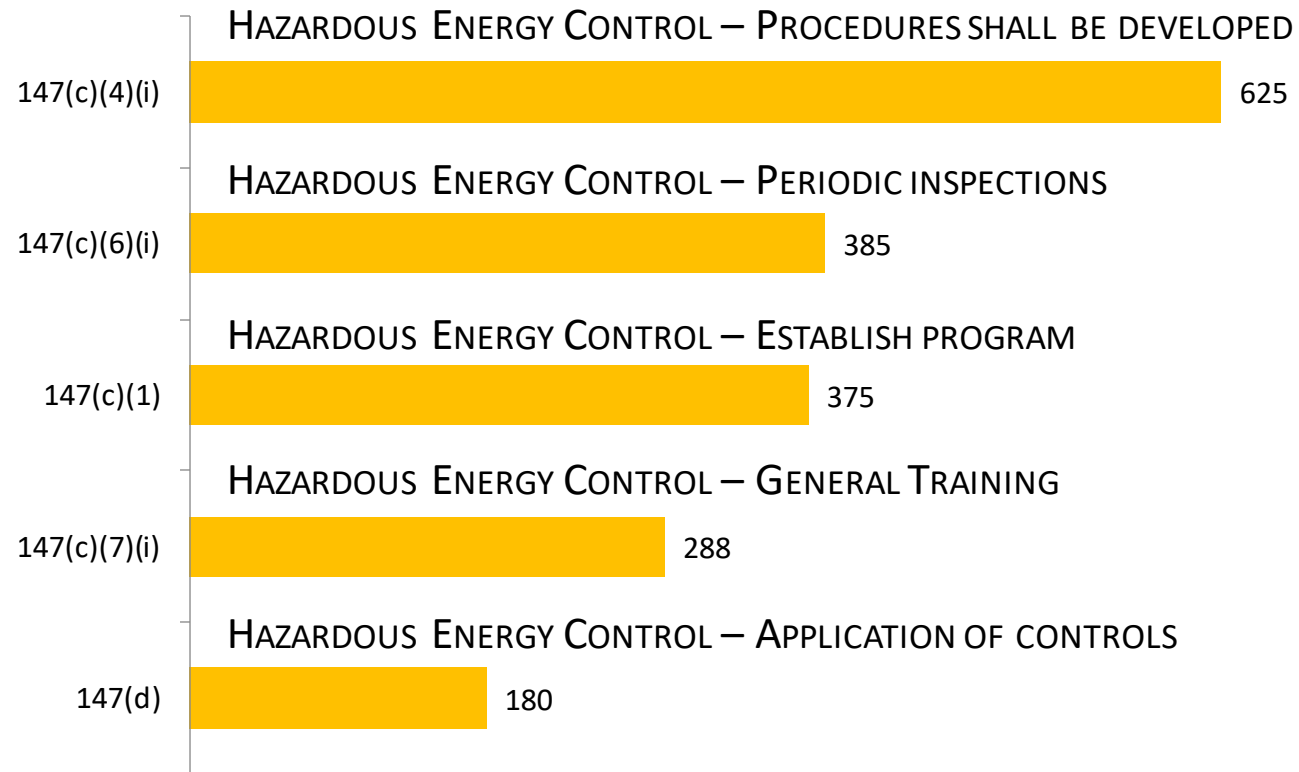
Food Manufacturing

- NAICS 3314xx, 3115xx, 3116xx
- Wisconsin only
- 170 lockout and 91 machine guarding citations in the sector in 2020.
- Will evaluate PPE and hot.cold.chem burn issues

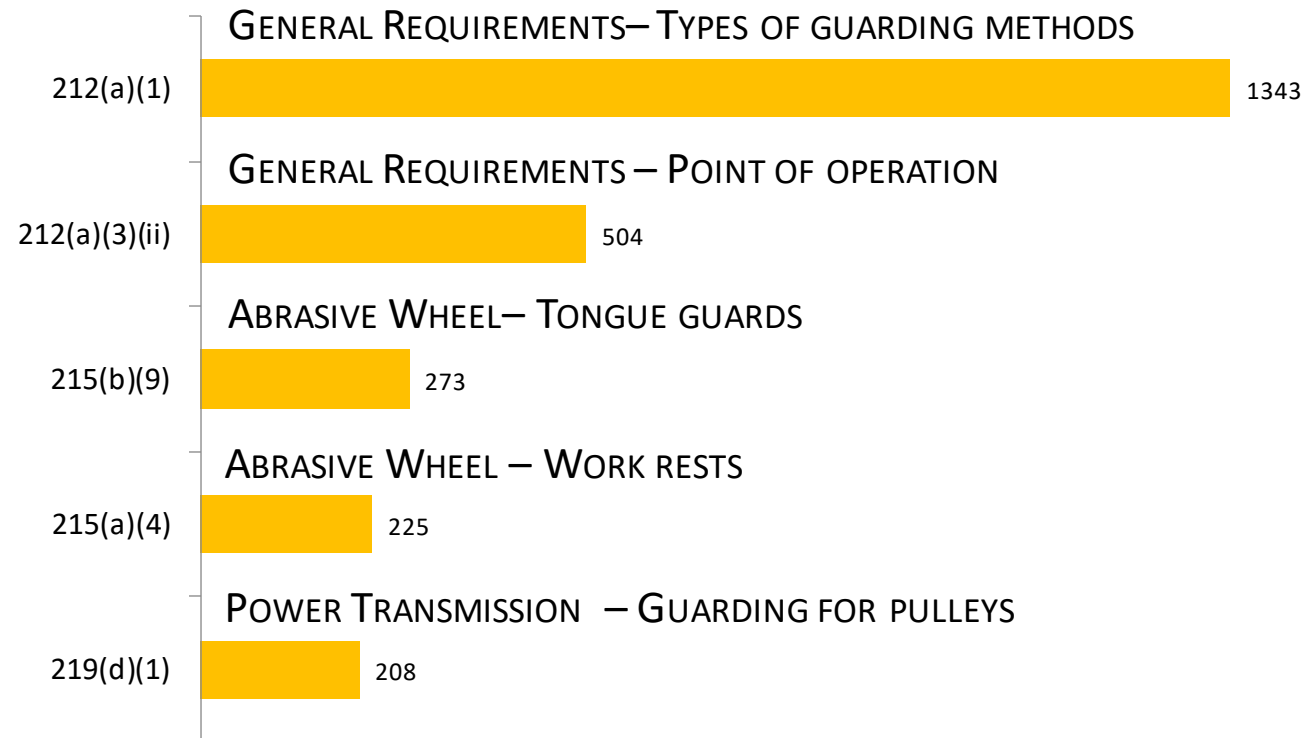
TABLE 2: Private Manufacturing Rates in Wisconsin in 2020

| Category | Food Manufacturing Rates (NAICS 311xxx) | Manufacturing Rates (NAICS 31-33) |
|---|--|--------------------------------------|
| Total recordable cases ¹ | 4.6 | 3.7 |
| Cases involving days away from work, job restriction or transfer ¹ | 3.5 | 2.2 |
| Fractures ² | 17.1 | 10.9 |
| Amputations ² | 5.6 | 3.8 |
| Cuts, lacerations, punctures ² | 13.4 | 9.8 |
| Chemical burns and corrosions ² | 6.1 | 1.4 |
| Heat (thermal) burns ² | 3.7 | 2.0 |

General Environment Controls [1910.141 – .147]



Machinery & Machine Guarding [1910.211 – .219]



Aug 2015

- Bumble Bee Foods and two managers were charged by Los Angeles prosecutors Monday with violating safety regulations in the death of a worker who was cooked in an industrial oven with tons of tuna.
- Bumble Bee Foods will pay \$6 million for “willfully violating worker safety rules,” according to the Los Angeles County District Attorney’s office.
- \$1.5 Million to the worker’s family



May 2014

- A 17-year-old has the ability to move his right arm again, thanks to surgery performed at Massachusetts General Hospital.
- Brett Bouchard severed his arm just below the elbow while cleaning a pasta machine at work.



Cleaning Training

- Cleaning a machine is not supposed to be a hazard.
- Guards are in place to prevent exposure to hazardous motions.
- If guards must be removed to clean, lockout is required.



Cleaning a conveyor is a common source of death and amputations. This conveyor does not have guards for the rotation of the horizontal drive shafts.

Cleaning Training



Noise REP

- According to BLS, the incident rate for hearing loss for all private industries nationwide was 1.4 per 10,000 full time workers.
- However, the national average hearing loss rate for All Private Manufacturing remains much higher, with 8.6 cases per 10,000 full time workers



OSHA

- NAICS 32xxxx and 33xxxx
- Wood and Metal mfg.
- Sound level readings
- Sampling for Noise

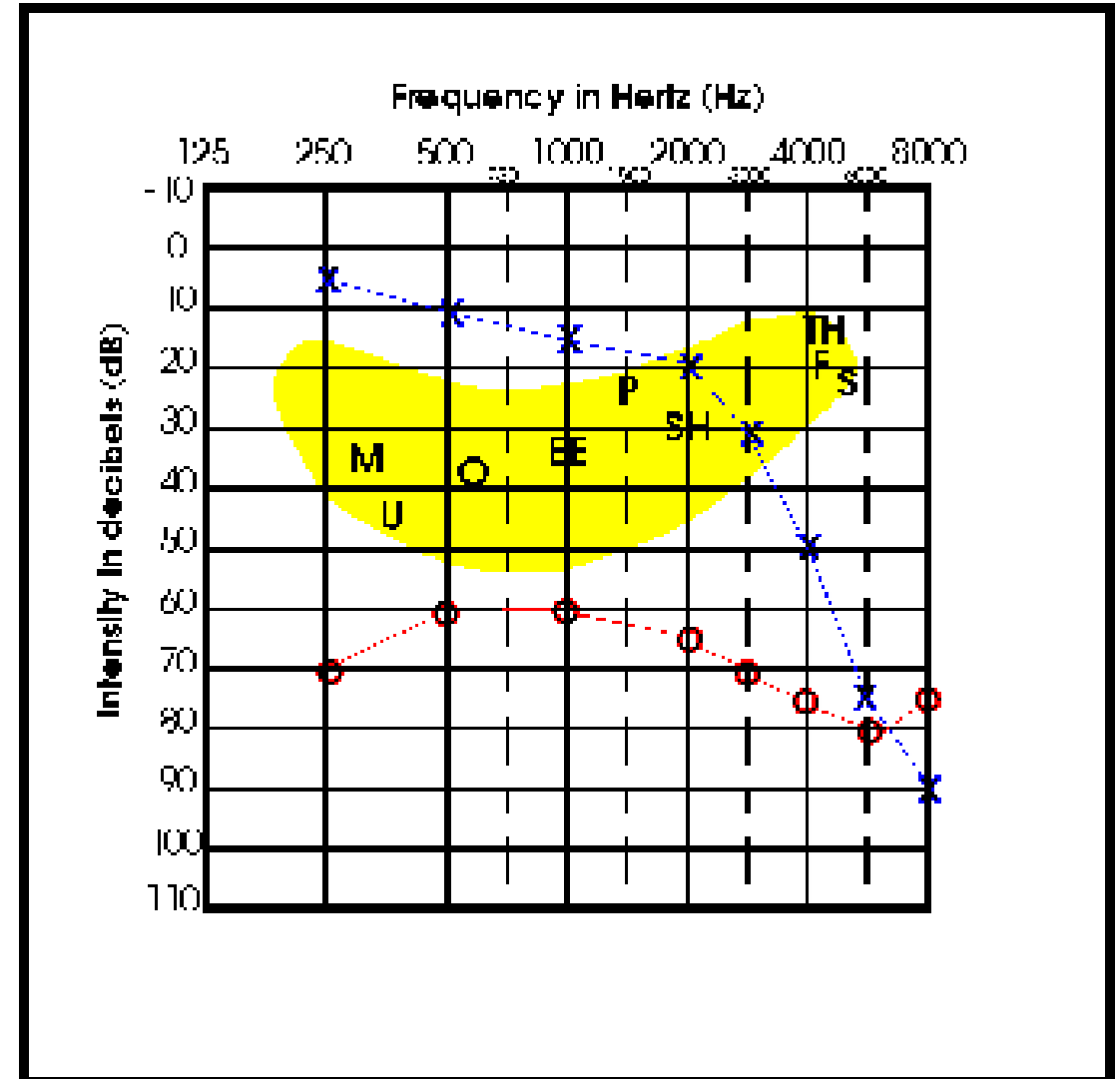


Regulations in the United States

| | OSHA 29 CFR 1910.95 Industry | OSHA 29 CFR 1926.52 Construction | MSHA 30 CFR Part 62 Mining | FRA 49 CFR 227/229 Railroads |
|------------------------------------|---|---|---|---|
| Permissible Exposure Limits | 90 dB | 90 dB | 90 dB | 90 dB |
| Action Level | 85 dB | 85 dB | 80 dB | 85 dB |
| Noise Monitoring | Required | Not Required | Required | Required |
| Audiometric Testing | Annual | Not Required | Annual | Every 3 Years |
| Training | Required New Hires/Annual | Not Required | Required New Hires/Annual | Required New Hires/Annual |
| Hearing Protectors | Required @ PEL | Required @ PEL | Required @ PEL Dual Protection @ 105 dB TWA | Required @ PEL |
| Recordkeeping | Required OSHA 300 Log | Not Required | Required | Required OSHA 300 Log |

“Effective hearing conservation program?”

- Monitoring
- Engineering, work practice, and administrative controls
- Hearing protectors with an adequate noise reduction rating
- Employee training and education in hazards and protection measures
- Baselines and annual audiometry



Ear Protection



Transport Tank Cleaning



Reusable ear plugs:

- regular and careful washing
- fitted by a trained person
- must be good fit
- dust may irritate

Ear defenders:

- well designed
- well made
- must be good fit



Transport Tank Cleaning

- During FY 2016 - 2021,
- Region V initiated 349 inspection activities within the industry resulting in 873 violations.
- 23 of the inspections were initiated as a result of a workplace fatality.
- Approximately 12 percent of the fatality investigations addressed worker entry into confined spaces and permit-required confined spaces.



Transport Tank Cleaning

| NAICS | Description |
|--------------|---|
| 484110 | General Freight Trucking, Local |
| 488210 | Support Activities for Rail Transportation |
| 488490 | Other Support Activities for Road Transportation |
| 488510 | Freight Transportation Arrangement |
| 562910 | Remediation Services |
| 562920 | Materials Recovery Facilities |
| 562998 | All Other Miscellaneous Waste Management Services |



Transport Tank Cleaning

- All inspections conducted at facilities where transportation tank cleaning is performed are covered by this Instruction.
- Confined space
- Recordkeeping
- Respirators
- Haz Com
- PPE
- EAP and Fire Protection



Transport Tank Cleaning

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Violation Elements

- Applicable Standard
- Existence of Hazard
- Exposure to Hazard
- Employer Knowledge

U.S. Department of Labor
Occupational Safety and Health Administration

Inspection Number: 154886
Inspection Date(s): 03/18/2015 - 03/14/2015
Issuance Date: 09/15/2015

Citation and Notification of Penalty

Company Name: U.S. Postal Service, dba U.S. Postal Service
Inspection Site: 204 Fairview Way, Greenville, SC 29607

Citation 2 Item 1. Type of Violation: **Willful**

29 CFR 1910.176(a): Where mechanical handling equipment was used, sufficient safe clearances were not allowed for aisles, at loading docks, through doorways or wherever entry or passage had to be made.

a) Workers: Aisle ways throughout the building used by powered industrial trucks (PITs) and personnel are blocked by containers of mail and equipment, restricting traffic flow. The lack of space around the equipment exposes pedestrians to struck-by hazards by PITs and other equipment.

ABATEMENT DOCUMENTATION REQUIRED FOR THIS ITEM

Date By Which Violation Must be Abated: 09/28/2015
Proposed Penalty: \$70000.00

[Signature]
Darlene Fincant
Area Director

See pages 2 through 4 of this Citation and Notification of Penalty for instructions on abatement and employer rights and responsibilities.
Citation and Notification of Penalty
Page 2 of 2
OSHA-2

Types of Violations

- **Other-Than-Serious.**
- **Serious**
- **Willful** – A violation that the employer intentionally and knowingly commits.
- **Repeated** – A violation of any standard, regulation, rule or order where, upon reinspection, a substantially similar violation is found and the original citation has become a final order.
- **Failure-to-Abate** – Failure to correct a prior violation may bring a civil penalty of up to \$7,000 for each day the violation continues beyond the abatement date.

Citation 1 Item 4 Type of Violation: **Serious**

29 CFR 1910.178(l)(2)(iii): All operator training and evaluation was not conducted by persons who have the knowledge, training, and experience to train powered industrial truck operators and evaluate their competence.

In the production area, the person who conducted the forklift training did not have any training or experience in the operation of forklifts and could not evaluate the competence of the forklift operators, exposing employees to struck-by and/or crush-by hazards.

Date By Which Violation Must be Abated:
Proposed Penalty:

07/18/2016
\$3500.00

Willful

- Defining *Willful*
- The panel stated that it reviewed OSHRC's decision using a "highly deferential standard" established in *Fluor Daniel v. OSHRC* (11th Cir. 2002).
- The panel quotes from *Fluor*: "[T]he definition of willful in this circuit is, in its simplest form, an intentional disregard of, or plain indifference to, OSHA requirements."



Employee Misconduct Defense

- All four elements required
 - (1) Program for the specific hazard, e.g. fall, electrical, lead, asbestos, cadmium, forklift
 - (2) Employee training (documentation)
 - (3) Prior enforcement (disciplinary records)
 - (4) No reasonable opportunity for supervisor to identify and correct hazard



OSHA Phone Investigations

Dear Mr. [REDACTED]:

On July 16, 2020, the Occupational Safety and Health Administration (OSHA) received a notice of alleged workplace hazard(s) at your worksite at:

[REDACTED] E. Lincoln Hwy.
DeKalb, IL 60115

We notified you, by telephone, of these alleged hazards on July 16, 2020. The specific nature of the alleged hazards is as follows:

1. Employees dry cut concrete without a respirator or adequate ventilation at back of store.
Possible related statute: 29 CFR 1910.1053 or 29 CFR 1926.1153

We have not determined whether the hazards, as alleged, exist at your workplace and we do not intend to conduct an inspection at this time. However, since allegations of violations and/or hazards have been made, we request that you immediately investigate the alleged conditions and make any necessary corrections or modifications.

Please advise me in writing, no later than **July 23, 2020** of the results of your investigation. You must provide supporting documentation of your findings, including any applicable measurements or monitoring results, and photographs/video which you believe would be helpful, as well as a description of any corrective action you have taken

OSHA Phone Investigations

RE: OSHA Complaint No. 1623991 dated July 16, 2020

Dear Duty Officer,

We are in receipt of your complaint letter number above regarding alleged workplace hazard. Orders at [redacted] job site located at [redacted] E. Lincoln Hwy. DeKalb, IL. Included herein as **Exhibit A** is an attachments of the posting of the July 16, 2020 Complaint letter. We have investigated the matter and submit the following responses, with additional detail below and attachments.

Alleged:

On July 17, I received OSHA complaint number 1623991. Over the course of the next couple days, we investigated allegation and established the following corrective actions. On July 18th we conducted a early morning safety meeting before starting the day, we rectified allegations of improper use of dry saw cutting and the nonuse of a respirator. All employees were reminded of their recent OSHA 10 certification **Exhibit B**. In addition, our company Silica Safety program **Exhibit C** was explained in detail to all who attended. Each employee signed in **Exhibit D** that they attended the safety meeting.

We want to assure the department of OSHA that [redacted] takes worker safety very seriously and continue to make progress on these items noted in the subject complaint.

We would be glad to further discuss the issues noted in the complaint and [redacted] past and present actions to address these issues. If you would like to further discuss, please contact me at (815) [redacted]. Thank you very much.

Sincerely,

OSHA Sample Document Request

U.S. Department of Labor

Occupational Safety and Health Administration
Chicago South Area Office
8505 W. 183rd Street, Suite C
Tinley Park, Illinois 60487



April 15, 2020

- Any and all OSHA-300, OSHA-301 and 300A forms for calendar years 2017, 2018, 2019 and current 2020.
- Any and all Illinois Form 45 (First Report of Injury) pertaining to the injury sustained by XXXX on April 10, 2020.
- Any and all documents relating to the BG, Inc. written Safety and Health program(s) which was in effect on April 10, 2020.
- Any and all documentation of training for xxxx before April 10, 2020.
- Any and all disciplinary rules and or policy(ies), relating to safety and health, in effect on April 10, 2020.
- Any and all records relating to any safety audits of any job sites performed by the company or on behalf of the company in the past 12 months.
- Copies of any and all disciplinary action taken against employees of BG, Inc. within the previous 12 months.

OSHA Sample Document Request

U.S. Department of Labor

Occupational Safety and Health Administration
Chicago South Area Office
8505 W. 183rd Street, Suite C
Tinley Park, Illinois 60487



April 15, 2020

- List of BG, Inc. employees on the jobsite on April 10, 2020. Please include job title and contact information (phone and address).
- Any and all documents which relate to the operation of the sheet winder(s), including, but not limited to, any owner's or operator's manuals or any instructions or guides provided by the manufacturer of the equipment.
- Any and all documents which relate to the operation of the sheet winder(s), including, but not limited to, any job safety analysis (JSA) or job hazard analysis (JHA) in effect on April 10, 2020.
- Any and all recordings or video surveillance from the production department cameras on April 10, 2020, between the hours of 3:30am and 5:30am.
- Any and all maintenance and/or servicing work orders for guarding devices on the sheet winder(s) from January 1, 2019 to April 10, 2020.
- Any and all investigation reports prepared by BG, Inc. regarding the incident that occurred on April 10, 2020.

Summary

- Many LEP and NEP affect employers
- Audit the OSHA issues for them
- Provide monthly training to managers and workers



