

OSHA (PESH) Records



Presented by:

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Objectives

At the end of this presentation you will know and understand:

- OSHA's Written Program Requirements
- OSHA's Training Documentation Requirements
- OSHA's Written Procedure Requirements
- OSHA's Records Retention Requirements
- Additional Requirements required by PESH





EAP & Fire Protection



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Emergency Action Plans

- Procedures for reporting a fire or other emergency;
- Procedures for emergency evacuation, including type of evacuation and exit route assignments;
- Procedures for employees who remain to operate critical plant operations before they evacuate;



Emergency Action Plans

- Procedures to account for all employees
- Procedures for employees performing rescue or medical duties
- The name or job title of who may be contacted for more information on the plan



Common Emergencies

- Fire and Explosions
- Workplace Violence
- Weather Related Emergencies
- Contact with underground or overhead power lines
- Power Outage
- Chemical Exposures
- Civil Unrest



Fire Protection Plans

A list of all major fire hazards including:

- Proper handling and storage procedures for hazardous materials,
- Potential ignition sources and their control, and
- Type of fire protection equipment necessary to control each major hazard



Fire Protection Plans

- Procedures to control accumulations of flammable & combustible waste materials;
- Procedures for regular maintenance of safeguards installed on heat-producing equipment
- The name or job title of employees responsible for maintaining equipment to prevent ignition or fires; and
- The name or job title of employees responsible for the control of fuel source hazards.



PPE



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Hazard Assessment

- Employer must assess the workplace for hazards requiring PPE
- Must Document this Hazard Assessment
- Hazard Assessment needs to be certified



Types of PPE

- Eye & Face Protection
- Hearing Protection
- Head Protection
- Hand Protection
- Respiratory Protection
- Foot Protection
- Body Protection
- Personal Fall Protection
- Electrical Protection



Sample Assessment

Operation	Hazards	Required PPE
Tree Trimming	Chainsaw Cuts Noise, Flying Objects Falling Objects, Falls	Chainsaw Chaps, Hearing Protection, Safety Glasses & Face Shield, Hard Hat, Steel Toe Boots, Harness and Lanyard
Cleaning Park Restrooms	Chemical Absorption Splashing Chemicals	Nitrile Gloves, Safety Glasses
Sanitation Worker	Cuts, Punctures, Struck by Traffic	Puncture Resistant Gloves ANSI Class II Vest



Additional PPE Requirements

- Provide appropriate PPE at no cost to employees
- Train employees on use, maintenance and care



Hearing Conservation Program

Whenever employee noise exposures equal or exceed an 8-hour level (TWA) sound of 85 decibels



Hearing Conservation Program

- Monitoring Data
- Employee Notification and Monitoring Observation
- Audiometric Testing
- Hearing Protectors
- Hearing Protector Attenuation
- Training & Access (Annual)
- Recordkeeping



Respiratory Protection Program

Whenever respirators are required by the employer, the employer shall establish and implement a written respiratory protection program



Program Contents

- Procedures for selecting respirators for use
- Medical evaluations for those required to use respirators;
- Fit testing procedures for tight-fitting respirators;
- Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;
- Procedures and schedules for maintaining respirators;



Program Contents

- Procedures to ensure adequate air quality, quantity, for atmospheric supplying respirators
- Training of employees in the respiratory hazards to which they are potentially exposed during routine and emergency situations;
- Training of employees in the proper use of respirators,
- Procedures for regularly evaluating the effectiveness of the program.



Required Records

- Sampling Data
- Medical Evaluations
- Fit Testing
- Appendix D (Voluntary Use of N95)
- Training Documentation (Annual)





Confined Space



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Program Requirements

- Confined Space Evaluation & Identification
- Entry Procedures
- Rescue Procedures
- Training



Permit

- Preventing Unauthorized Entry
- Identify and Evaluate Hazards
- Specify Acceptable Entry Conditions
- Isolation of Hazards
- Atmospheric Testing Results
- Other Equipment Needs
- Rescue & Emergency Equipment

ENTRY PERMIT

CONFIRMED SPACE: _____ HAZARDOUS AREA: _____ PERMIT NO.: _____
*PERMIT VALID FOR 800 HOURS ONLY *ALL SIGNS OF PERMIT MUST REMAIN AT JOB SITE UNTIL JOB IS COMPLETED

SITE LOCATION/DESCRIPTION: _____
PURPOSE OF ENTRY: _____
DATE: _____ PERMIT EXPIRATION DATE/TIME: _____
SUPERVISOR IN CHARGE OF WORK: _____ TYPE OF WORK: _____ PHONE NO.: _____

REQUIREMENTS TO BE COMPLETED PRIOR TO ENTRY

Item	Yes/No	Item	Yes/No
Lock Out Tag Out (LOTO) 1910.149		LifeLines	
Energy Isolation 1910.149		Rescue/Retrieval	
Locks/Blocks/Tags/Keys/Removal		Sanitary Safety Restrooms	
Purges/Flush/ventilate		Fall Risk (vertical path 10' or up)	
Notification		Fire Extinguishers	
Breathing Apparatus		Lighting (adequate amount)	
Emergency Escape Routes/Exits/Signage		Medical Clinics	
Communication Devices		Permit(s) (if applicable)	
Atmospheric Monitoring Devices		Rescue and Recovery Plan	
Network Area (optional tag)			

CONTINUOUS MONITORING (check hours every 2 hours)

Parameter	Value	Time	Time	Time	Time	Time	Time	Time
Permit in Scope	100%							
Locks/Blocks/Tags/Keys/Removal	100%							
Energy Isolation	100%							
Multiple Locks/Tags/Keys/Removal	100%							
Multiple Locks/Tags/Keys/Removal	100%							
Multiple Locks/Tags/Keys/Removal	100%							
Multiple Locks/Tags/Keys/Removal	100%							
Multiple Locks/Tags/Keys/Removal	100%							

NEEDS PROCEDURE

ADDITIONAL INFORMATION

EMERGENCY PHONE NUMBERS

PERMIT AUTHORIZATION (see 1910.149)

NAME	DATE	SIGNATURE	TYPE

PERMIT NO.: _____ PHONE NO.: _____

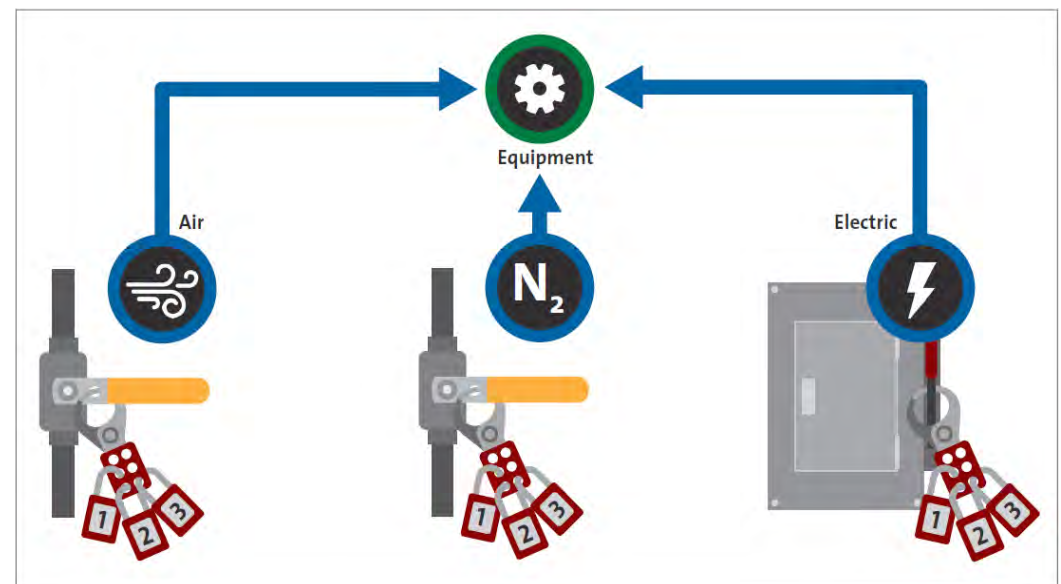
Lockout/ Tagout



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General Requirements

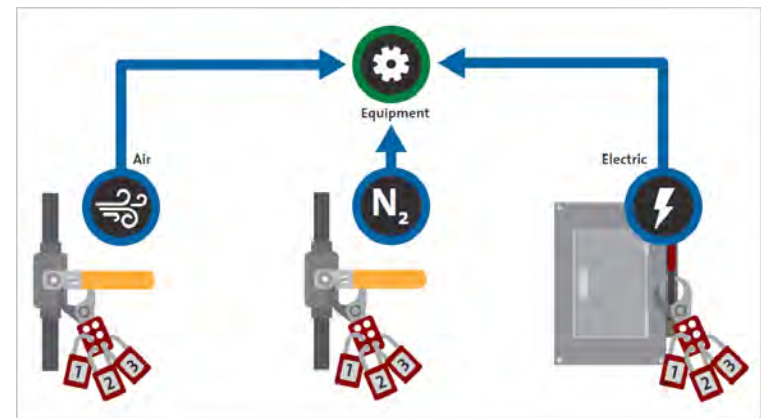
- The employer shall establish a program consisting of:
 - Energy control procedures,
 - Employee training and,
 - Periodic inspections



Procedures

Documented Equipment Energy Control Procedure:

- Scope, purpose and authorization
- Intended Use
- Procedural Steps for Isolating energy sources
- Procedural Steps for applying LO/TO devices
- Procedural Steps for Verification



Energy Sources

- Any source of:
 - Electrical,
 - Mechanical,
 - Hydraulic,
 - Pneumatic,
 - Chemical,
 - Thermal, or
 - Other energy



Periodic Inspection

- A periodic inspection of the energy control procedure must be conducted at least annually

Energy Control Procedure

This procedure covers the servicing and maintenance of machines and equipment in which the "unexpected" energization or start up of the machines or equipment, or release of stored energy could cause injury to employees. The purpose of this procedure is to ensure machines are completely de-energized, and employees are fully protected during servicing or maintenance. The plant manager authorizes the use of these procedures. Our rules call for following all the requirements set forth in OSHA regulation 1910.147 for controlling hazardous energy, and using the techniques outlined in Appendix A of 1910.147. Employees not following these requirements will be subject to disciplinary procedures.

Machine Name: _____ Location: _____

Equipment Number: _____

Authorized Employee(s) _____

Affected Employee(s) _____

<u>Energy Source Type</u>	<u>Magnitude of Energy</u>	<u>Energy Hazard</u>	<u>Control Device</u>
_____	_____	_____	_____

1. Notify Affected Employee: Contact Department Supervisor to take machine off production schedule, and notify affected employee(s) machine will be locked out. _____

2. Machine Shutdown: Identify type and location of operator controls. _____

3. De-activation: Identify type and location of energy isolating devices. _____

4. Lock out: Apply locks to energy isolating devices.

5. Stored Energy: Identify location of stored energy source(s), and describe method(s) for dissipation or restraint. _____

6. Verify Energy Isolation: Try operator controls and return to 'OFF' position.

"Restoring Equipment to Service": When the servicing or maintenance is completed and the machine or equipment is ready to return to normal operating condition, the following steps shall be taken.

(1) Check the machine or equipment and the immediate area around the machine to ensure that nonessential items have been removed and that the machine or equipment components are operationally intact.

(2) Check the work area to ensure that all employees have been safely positioned or removed from the area.

(3) Verify that the controls are in neutral.



Periodic Inspection

- The periodic inspection shall be performed by **an authorized employee other than the one(s) utilizing the energy control procedure** being inspected
- The periodic inspection shall be conducted to correct any deviations or inadequacies identified



Periodic Inspection

- The periodic inspection shall include a review, between the inspector and each authorized employee, of that employee's responsibilities under the energy control procedure being inspected



Powered Industrial Trucks



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Powered Industrial Truck

PIT Training Program must include:

- Training of employees
- Evaluation of employee operation
- Certification by the employer



Retraining Requirements

Retraining and Re-evaluation must occur when:

- Unsafe Operation
- Accident or Near Miss Incident
- Bad Evaluation
- Different Type of Truck
- Workplace Condition Change



An evaluation of each Operator must be conducted every 3 years





Hazard Communication



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Hazard Communication Program

Employers shall develop, implement, and maintain at each workplace, a written hazard communication program

- labels and other forms of warning,
- safety data sheets, and
- employee information and training

In 2012 the HCS changed when we adopted GHS

Right to Know (HCS)

- List of Chemicals
- Hazards of Non-Routine tasks
- Provide Access to SDS
- Provide Training on Chemical Hazards (Annual)





Bloodborne Pathogens



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Bloodborne Pathogens

Each employer shall prepare an exposure determination. This exposure determination shall contain the following:

- Job classification with exposure
- Task and Procedures where there is exposure



Bloodborne Pathogens

Occupational Exposure means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties.



Bloodborne Pathogens



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Bloodborne Pathogens

Typical Jobs with Occupational Exposure:

- Emergency Responders
- Parks and Recreation (Lifeguards)
- School Nurses
- Janitorial Staff
- Sanitation Workers
- First Aid/ CPR Responders
- Coroner





Exposure Control Plan

Exposure Control plan needs to include the following:

- Engineering and Work Practice Controls
- PPE
- Regulated Waste
- Hepatitis B Vaccination
- Post Exposure Follow UP
- Recordkeeping
- Employee Information & Training (Annual)

The Exposure Control Plan must be reviewed annually





Other Substance Specific Standards



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Other Substances

The following other substances may have written program requirements and medical surveillance requirements based on exposure determination:

- Lead
- Asbestos
- Silica
- Hexavalent Chromium
- Formaldehyde



Medical Records



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Medical Records

Medical Records must be maintained for the length of employment plus 30 years. Examples:

- Monitoring Data
- Medical Evaluations
- Audiometric Testing
- Employee Exposure Records
- MSDS & SDS





Additional PESH Requirements

Additional PESH Requirements

- Workplace Violence Prevention Programs
- Rabies Prevention



WPV Programs

- Develop and post a written policy statement
- Conduct a risk evaluation.
- Develop a workplace violence prevention program
- Provide training and information for employees
- Document workplace violence incidents and maintain those records.





WPV Risk Factors

- Duties that involve the exchange of money
- Delivery of passengers, goods, or services
- Duties that involve mobile workplace assignments
- Working with unstable or volatile persons in health care, social service, or criminal justice settings
- Working alone or in small numbers





WPV Risk Factors

- Working late at night or during early morning hours
- Working in high-crime areas
- Duties that involve guarding valuable property or possessions
- Working in community-based settings
- Working in a location with uncontrolled public access to the workplace



Rabies Control Program

Exposure Control Program should include the following:

- Job assignments with expected exposure
- Procedures for handling potentially infected animals
- Personal protective equipment
- Biohazard bags for transporting road kill & lab specimens
- Labeling of animal cage used in transport
- Documenting Employee Exposure Incidents
- Training and Education
- Review of Exposure Incidents





Injury & Illness Logs



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SH-900

SH-900 Injury and Illness Log

SH-900.1 Annual Summary

SH-900.2 Incident Reports

Retain Records for 5 Years





Other Training Requirements

- Fall Protection
- Aerial Lifts, Bucket Trucks
- Scaffolding
- Excavation
- HAZWOPER (Hazardous Waste Operations)



Training Documentation

Training Documentation should include the following:

- Name of the Student
- Name of the Trainer
- Date the training was completed
- Training Content





Questions

