EHS Support
consider it done

Consider This

HEALTH & SAFETY NEWSLETTER
AUGUST 2015

Prepare for an OSHA Audit in 7 Steps

Who's on your Safety All-Star Team

Feedback on Your H&S Program

NIOSH & Partners Recommend Controls for Silica Exposure

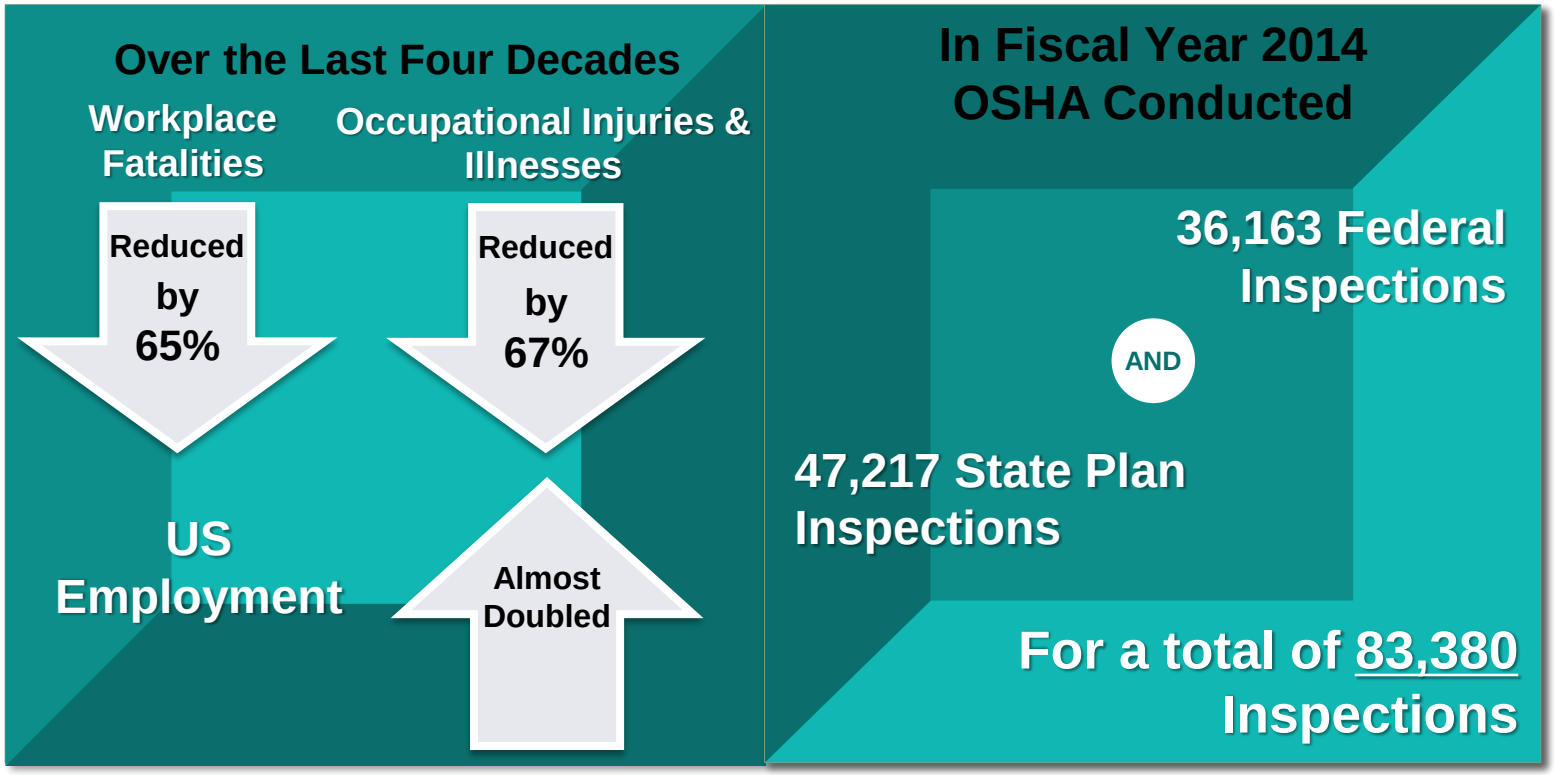
Captain Obvious

ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Work Safe. Live Safe. Stay Safe.

Prepare for an OSHA Audit in 7 Steps

A health and safety (H&S) compliance audit (or mock-OSHA audit) can be a critical tool for business and facilities to mitigate risk and avoid business interruption and costly fines. Many companies are unsure whether they are in compliance with H&S regulations, or may not realize they are out of compliance. When EHS Support audits your facility, we provide experts in regulatory compliance to work with your company to create awareness of OSHA's regulations and proactively assist your company with compliance before an actual OSHA inspection. When OSHA sees a company who is working hand in hand with a third-party consulting company, it demonstrates that a good faith effort is being put forth towards improving the safety of their employees.



Continued on next page

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Prepare for an OSHA Audit in 7 Steps (Cont.)

EHS Support's 7-Step mock-OSHA audit includes:

1. Preliminary information gathering
2. Opening meeting
3. Desktop audit
4. Facility audit/walkthrough
5. Employee and management engagement
6. Closing meeting
7. Comprehensive final report.

Prior to visiting a client's site, our **preliminary information gathering** process allows all parties to come together via an online conference call and discuss the company's work environment, current H&S programs, management systems, culture, compliance initiatives, accident prevention programs, training, inspections and recordkeeping. A complete list of desktop items will be requested ahead of time to expedite the audit process.

The **opening meeting** is comprised of key facility specific personnel typically includes the following representatives, but not limited to: EHS manager, HR manager, plant manager, safety committee representative, union representative, and employee representative. The auditor reviews the audit process, documents to be reviewed, audit scope and discusses specific issues or concerns the facility representative may have.

The **desktop audit** includes an enhanced review of all current H&S programs, policies and procedures, inspections, training documentation, recordkeeping, industrial hygiene surveys, accident investigations, safety data sheets, etc.

During the **facility walkthrough**, the auditor will inspect all areas of the facility checking for compliance against OSHA regulations. If allowed, pictures will be captured to include in the final report as visual aids.

Continued on Next Page

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Prepare for an OSHA Audit in 7 Steps (Cont.)

Employee and Management Engagement: Employees are interviewed to gain a perspective on work safe work practices, procedures they follow, whether compliance is demonstrated in work activities and trainings these employees have undergone for the tasks they are preforming.

An **audit closing meeting** will educate staff and explain the findings of the audit. This meeting will allow the staff the opportunity to ask questions and receive one-on-one feedback on how the team is performing and suggestions to enhance or change their current processes. The meeting will review the following:

- *Program Area Audited and Regulatory Requirement* – a description of the regulatory requirement
- *Regulatory Citation* – the federal, state or permit citation that corresponds to the finding
- *Finding* - physical description of location of finding accompanied by photograph, if appropriate
- *Recommended Corrective Action* – description of steps required to achieve compliance with the regulatory requirement. Where possible, the recommended corrective action will include descriptions or links to regulatory guidance or other resources that may assist the facility in addressing the compliance issue.

The **audit report** is the final step of the mock audit. EHS Support will prepare a comprehensive audit report that includes a summary of the audit scope, audit activities performed, and a summary table containing the findings of the audit. We don't stop at just listing the findings, we prioritize your risk, recommend corrective action and help manage compliance. As with many of our clients, extra time and understanding of compliance are hurdles that companies struggle to overcome. EHS Support is poised to eliminate those hurdles and get you where you need to be.

Remember, compliance doesn't mean personnel are safe and you will be incident free. Following what's required is only the beginning. Just because a machine has all of its guarding in place (**Compliance**) doesn't mean that your employee is not under pressure to get a job done (**State**), enters into the line of fire (**Error**), and then gets injured.

Let EHS Support help you establish your foundation of compliance and then change your culture!

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Who's on your Safety All-Star Team?

As we watched the repeated long balls being crushed during Major League Baseball's Home Run Derby contest and the elite showing off their skills in the All-Star Game, I can't help but correlate safety in industry to baseball.

Not only did Todd Frazier have his home crowd jumping, he had flair for the dramatic during the Home Run Derby contest as he put on a tremendous show belting out 39 homers en-route to a hometown victory. The All-Star Game encompassed an absurd abundance of young talent alongside some of the most skilled veterans of baseball. As I watched in awe of skill, form, fundamentals, talent, nerves and physical and mental execution, I compared the realm of safety with what I was watching.

I have worked with countless businesses over the years and have been introduced to key members of each of their workforces who demonstrated a flair for encompassing safety into their jobs, meetings, trainings and day in and day out repetitive tasks. They got it and it showed. They understood that safety is each individual's responsibility, they showcased safety in a positive manner, they embraced safety as a core value and part of the overall business process, and they executed safety in each task they performed. They were the company's All-Stars when it came to the topic of Safety.

Company's Utilized these All-Stars by:	
• Training others • Observing safe behaviors • Conducting safety trainings • Leading safety committee meetings • Championing safety initiatives • Identifying hazards • Mentoring green personnel • Implementing process change	• Strengthening culture change • Auditing facility compliance • Sharing lessons learned • Engaging others to exemplify safe working habits • Supervising accident investigations • Overseeing inspections • Building safety awareness

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Feedback on Your H&S Program: Dealing with Defensiveness

Whether you are a new or seasoned H&S professional or a supervisor attempting to manage safety, we all have goals of building a great foundation for our safety programs, ensuring management commitment and desiring their outpouring of praise, empowering personnel at all levels to be a leader in safety, developing the systems that will shoot us from good to great and astounding personnel with eye-opening training and information that will positively impact the culture in record-breaking time.

As we try to wrap our arms around this process, it is crucial to not solely rely on our opinions of progress, but open up the lines of communication to receive feedback from others AND provide feedback to others. As that door is opened further and further and people feel comfortable expressing their understanding, frustrations, successes and opinions, we now have to be prepared with our response (internally and externally) to the requested feedback.

Continued on Next Page

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Feedback on Your H&S Program: Dealing with Defensiveness

Providing Constructive Feedback - Mistakes to Avoid

Not providing feedback to another.	This is doing both parties a disservice – and it sets someone up to continue to disappoint you.
Waiting too long to provide feedback.	December is not the time to bring up the initial conversation of issues noticed in June. If conducting a performance review, remember it is a 'review' of items that should not spark confusion.
Sugar coating negative feedback.	While this may be common to not want to hurt feelings, stick to the facts and present constructive criticism that will help them achieve the desired results.
Don't be vague, use specific examples.	Advice centered around "Be more careful" or "Be safer" means nothing. Specific examples providing concrete recommendations give an answer and a path to take. "Do not bypass a guard that is attached to the equipment" defines the correct means of performing the task.
Mistaking valid reasons for excuses.	Be open to understanding that there may be another way other than your way. When personnel feel like their legitimate points are seen as excuses, they tend to shut out the accuser and become resentful.
Stating what is wrong without offering a clear indication of what is needed.	This may lead to the receiver feeling unsure about what they need to do to succeed. On the opposite side…

Continued on Next Page

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Feedback on Your H&S Program: Dealing with Defensiveness

Accepting Constructive Feedback – Tidbits of Advice

Stop your first reaction.	Possibly try to not react at all and allow time to process the information.
Listen to understand.	As feedback is being provided, without interruption, repeat back what you heard. For example, "I believe you are saying that the form provided is not user friendly and it should be improved?"
Do not respond in anger.	We all have to give feedback at one time or another and the giver of feedback may be nervous and unable to express sincere intentions. Treat the other person with respect and understanding.
Say Thank You!	Appreciate their time for opening up with you. This doesn't mean you're agreeing with the assessment, but that you are acknowledging your colleagues effort and sharing of thoughts and opinions.
Request Time to Follow Up.	Whether you may need time to evaluate, ask more questions or prepare a plan of action, ask for a follow-up meeting to discuss progress or roadblocks.

We cannot improve by overlooking weaknesses. When we are defensive and not accepting of truth, we risk missing out on important insight towards improvement and success. **Constructive feedback is not easy to give and not easy to receive, but will help all parties in the long run.**

Source: http://www.forbes.com/sites/dailymuse/2012/11/07/taking-constructive-criticism-like-a-champ/
http://www.humannatureatwork.com/constructive-feedback-mistakes-to-avoid.htm

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

NIOSH & Partners Recommend Controls for Silica Exposure During Asphalt Pavement Milling

Nearly 367,000 U.S. highway, street and bridge construction workers are at risk of exposure to respirable crystalline silica. According to research, workers currently use a variety of machinery when removing and recycling asphalt pavement, some of which generate airborne crystalline silica dust, putting road crews at risk of respiratory illness. In an ongoing effort to help mitigate these exposures, NIOSH has developed a document that provides recommendations for controlling worker exposure to respirable crystalline silica.

"Best Practice Engineering Control Guidelines to Control Worker Exposure to Respirable Crystalline Silica during Asphalt Pavement Milling" (http://www.cdc.gov/niosh/docs/2015-105/pdfs/2015-105.pdf), developed through the Silica/Asphalt Milling Machine Partnership, represents more than 10 years of collaborative research. Many companies use cold-milling machines with serrated rotating cutters that grind and remove pavement. Dust generated from these machines often contains respirable crystalline silica, which can be mixed into the air workers breathe.

The guidelines aim to provide best risk reduction measures such as ventilation controls, machine design alterations and water sprays used to cool the cutting teeth of milling machines to lessen silica dust exposure.

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates and Answers to FAQ's

EHS Support consider it done

Consider This
HEALTH & SAFETY NEWSLETTER

Why is it that safety professionals are getting heckled when we provide reminders on basic safety information and then go into a facility to conduct a mock-OSHA audit and find the same type of potential hazards or non-compliance items over and over again? Each month we feature a "Captain Obvious" photo to share simple safety reminders that are found on jobsites every day.

CORRECTIVE ACTIONS

- Ensure no objects be placed in the pathway where they would obstruct and delay an unassisted, potentially blinded person who needs to reach these emergency eyewash stations.
- Inspect emergency eyewash stations weekly.
- Train personnel on proper maintenance of emergency eyewash stations.

FINDING

Obstructed Emergency Eyewash Station

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

As we visit client facilities we typically get questions surrounding emergency showers and eyewash stations. The following is an effort to address the newest and most current changes for the **ANSI Z358.1-2014** standard released back on January 8, 2015:

- **Section 4.1.5 –** 'Emergency showers shall be designed, manufactured and installed in such a manner that, once activated, they can be used without requiring the use of the operator's hands.' **(2009 standard did not specify hands-free operations for emergency showers).**
- **Section 4.6.3 –** 'Self-contained emergency showers shall be visually checked weekly to determine if flushing fluid needs to be changed or supplemented. Such inspection shall be conducted in accordance with manufacturer's instructions.' **(2009 standard did not specify checks were to occur weekly).**
- **Section 5.4.4, 6.4.4 –** Eyewashes and Eye/Face Washes shall 'be arranged such that the flushing fluid flow pattern as described in Section 5.1.8 (and 6.1.8) is not less than 33 in. and no greater than 53 in. from the surface on which the user stands and 6 in. minimum from the wall or nearest obstruction.' **(2009 standard specified that the 'height of the nozzles' be no greater than 45 in. 2014 standard specifies that the 'height of the fluid flow pattern' be no greater than 53. A greater importance has been placed on the height of the flushing fluid stream).**
- **Section 5.5.3 –** 'Self-contained eyewashes shall be visually checked weekly to determine if flushing fluid needs to be changed or supplemented. Such inspection shall be conducted in accordance with manufacturer's instructions.' **(2009 standard did not specify checks were to occur weekly).**
- **Appendix B5 –** 'A single step up into an enclosure where the equipment can be accessed is not considered to be an obstruction. Additionally, installers should allow for adequate overhead clearance to accommodate the presence of cabinets over counter-or faucet-mounted emergency eyewashes so as not to create an additional hazard that could be encountered when using the device.' **(2009 standard did not contain this verbiage).**

Continued on Next Page

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

EHS Support consider it done

Consider This
HEALTH & SAFETY NEWSLETTER

ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Tepid Water: In previous versions of the ANSI Z358.1 standard, tepid water was mentioned in the Appendix of the standard. Now in the 2009 standard, tepid water requirements have now been moved into the Definitions section and clearly defines a tepid water range of 60˚ -100˚ F.

Equipment Location
- The ANSI standard states that all flushing equipment must be located in accessible areas within 10 seconds (roughly 55 ft), also known as as the 10 second rule.

Obstructions
- Safety showers and eyewash stations must be located on the same level as the hazard and the path of travel free from obstruction. If the hazard is non-corrosive, 1 door can be present as long as it opens in the same direction of travel.

Identification
- Eyewash and drench shower stations must be installed in a well-lit area and identified with a highly visible safety sign.

Shut-Off Valves
- If shut-off valves are installed on the supply line for maintenance purposes, provisions must be in place to prevent unauthorized shut-off. Lock-out Tag-out devices are the most common method to secure shut-off valves.

Waste Disposal
- Proper disposal of contaminated flushing fluid must be considered when installing new equipment. Drainage, freezing temperatures, pollutants, and elevated showers are some factors to consider.

Maintenance & Testing
- The ANSI standard states that plumbed flushing equipment, *"shall be activated weekly for a period long enough to verify operation and ensure flushing fluid is available".* Furthermore, the standard also requires Portable and Self Contained equipment to be "*visually checked to determine if flushing fluid needs to be changed or supplemented".*

Personal Wash Units/Bottled Eyewash
- Bottled Eyewash or other Personal Wash Units such as single head Drench Hoses are considered to be **supplemental equipment only**. These types of flushing units do not meet ANSI's requirements for Eyewash and/or Drench Shower stations and should not be used as an alternative to a 15-minute flushing station. The standard states, *"A personal wash unit may be kept in the immediate vicinity of employees working in a potentially hazardous area. The main purpose of these units is to supply immediate flushing. With this accomplished, the injured individual should then proceed to a plumbed or self contained Eyewash and flush the eyes for the required 15-minute period."*

Prepare for an OSHA Audit in 7 Steps
Who's on your Safety All-Star Team?
Feedback on Your H&S Program
NIOSH & Partners Recommend Controls for Silica Exposure
Captain Obvious
ANSI Z358.1-2014 Eyewash Standard Updates & Answers to FAQ's

Contact Monica Meyer at Monica.Meyer@ehs-support.com today to learn more about how we can help you manage your health and safety risks.