EHS Support
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Consider This

HEALTH & SAFETY NEWSLETTER
JULY 2015

Recordkeeping Update: Is your Industry Affected

2015 OSHA Hazcom 2012 Deadline

Breathe Easy – Establishing a Respiratory Protection Program

Coming Soon: ISO 45001 – Occupational Health and Safety Management

Captain Obvious

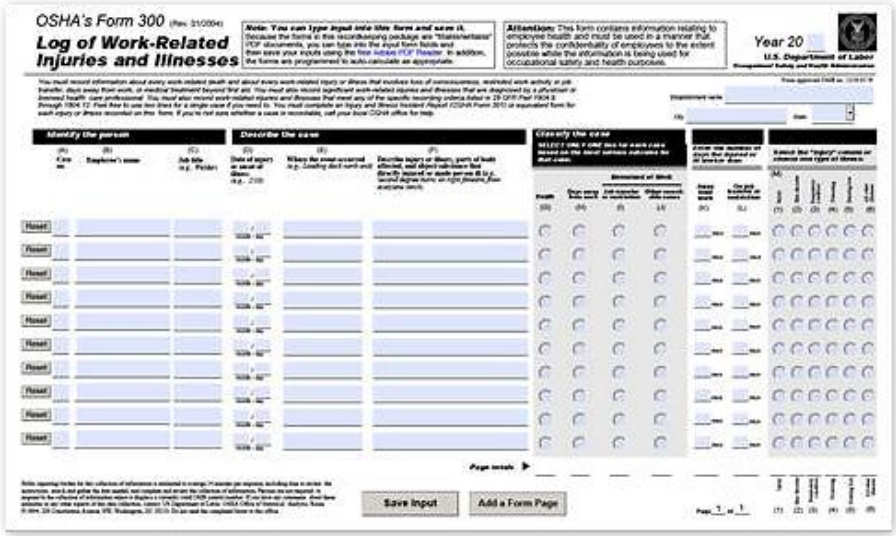
Golf Cart Safety

Work Safe. Live Safe. Stay Safe.

Recordkeeping Updates: Is your Industry Affected?

When OSHA's updated injury reporting and recordkeeping rules took effect on January 1, 2015, employers in over two dozen industries became required to maintain OSHA 300 Logs for the first time. Is your company in one of the affected industries – and if so, are you prepared? The reason for the change is a switch from the older Standard Industrial Classification (SIC) codes to the new System, OSHA analyzed recent data on work-related injury and illness rates from the Bureau of Labor Statistics (BLS) to determine which industries would be required to keep records under the updated rule.

Designated low-hazard industries are not required to routinely keep injury and illness records unless specifically requested to by OSHA, the BLS, or another authorized entity. Establishments that employed 10 or fewer employees at all times throughout the previous calendar year are also exempt from the requirement to maintain injury and illness records regardless of industry.


OSHA's Form 300

Log of Work-Related Injuries and Illnesses

Year 20

Save Input

Add a Form Page

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Recordkeeping Updates: Is your Industry Affected? (Cont.)

New Industries Required to Keep Records

- Bakeries and tortilla manufacturing
- Activities related to real estate
- Individual and family services
- Automobile dealers
- Consumer good rental
- Community food and housing, and emergency and other relief services
- Automotive parts, accessories, and tire stores
- Commercial and industrial machinery and equipment rental and leasing
- Performing arts companies
- Building material and supplies dealers
- Other professional, scientific, and technical services
- Promoters of performing arts, sports, and similar events
- Specialty food stores
- Facilities support services
- Museums, historical sites, and similar institutions
- Beer, wine, and liquor stores
- Services to buildings and dwellings
- Other amusement and recreation industries
- Other miscellaneous store retailers
- Other support services
- Special food services
- Direct settling establishments
- Other ambulatory care services
- Other personal services
- Lessors of real estate

Clark, E. (2015, Spring/Summer). Recordkeeping Updates: IS Your Industry Affected. Safety *Decisions,* 40-42.

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2015 OSHA Hazcom 2012 Deadline

Did the June 01, 2015 OSHA Hazcom 2012 Deadline Apply to You? What about the next two deadlines?

There is a great deal of confusion and some panic over the June 1, 2015 deadline for Hazcom 2012 compliance. Listed below are a few facts that may clarify your responsibilities:

Who did the June 1 deadline really apply to? The June 01, 2015 OSHA deadline ONLY applied to manufacturers of chemicals and products requiring a safety data sheet (SDS). Only the original author of the SDS needed to comply with this deadline. If you are an employer managing SDS records from your suppliers so that your employees have access to them, this deadline did not apply to you.

What about chemical "blenders" who need the revised SDS from the manufacturer to re-issue their SDS? The most recent deadline on June 1, 2015, was the date by which manufacturers and many distributors and importers were expected to reclassify chemicals and update all safety data sheets and labels to the new GHS format. OSHA has issued some clarification for this. If you are the author of an SDS and you want to meet the June 01 deadline, but are having difficulty because you can't do so until you receive an updated SDS from your upstream suppliers, OSHA may use "discretion" regarding enforcement if you have shown that you have made a reasonable effort to obtain the revision, kept records of your attempts, researched alternate suppliers, etc.

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2015 OSHA Hazcom 2012 Deadline (Cont.)

With two more deadlines approaching, including the final one on June 1, 2016, the time is now for companies to do all they can in order to be fully GHS compliant.

What about chemical distributors? Distributors who buy chemicals from chemical manufacturers and then resell them to you have until December 01, 2015 to stop sending out the old MSDS format sheets and labels and only supply the new SDS format sheets and labels. Therefore if you are thinking of updating your collection to the most recent version, you may wish to consider holding off until 1st or 2nd quarter of 2016, because by then it is reasonable to expect that manufacturers and distributors are only sending the new SDS versions.

What about secondary container labels? If you currently use secondary container labels you have until June 01, 2016 to switch to the new SDS format.

Effective Dates

Effective Completion Date	Requirement(s)	Who
December 01, 2013	Train employees on the new label elements and safety data sheet (SDS) format.	Employers
June 01, 2015 **December 01, 2015**	Compliance with all modified provisions of this final rule, except: The Distributor shall not ship containers labeled by the chemical manufacturer or importer unless it is a GHS label	Chemical manufacturers, importers, distributors, and employers
June 01, 2016	Update alternative workplace labeling and hazard communication program as necessary, and provide additional employee training for newly identified physical or health hazards.	Employers
Transition Period to the effective completion dates noted above	May comply with either 29 CFR 1910.1200 (the final standard), or the current standard, or both	Chemical manufacturers, importers, distributors, and employers

http://www.m3vsoftware.com/june-2015-osha-deadline.asp

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Breathe Easy – Establishing a Respiratory Protection Program

6 Simple Steps!

The following information highlights major steps for setting up a respiratory protection program and identifies additional resources. Employers who decide to use respiratory must follow all requirements of the Occupational Safety and Health Administration's (OSHA) Respiratory Protection Standard 29 CFR 1910.134.

Exposure Assessment – OSHAs 1910.134(d) states: "The employer shall identify and evaluate the respiratory hazard(s) in the workplace; this evaluation shall include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form."

Written Respiratory Program – A written program is required for mandatory use of respiratory protection and recommended for voluntary use. OSHA 1910.134(c) states: "In any workplace where respirators are necessary to protect the health of the employee or whenever respirators are required by the employer, the employer shall establish and implement a written respiratory protection program with worksite-specific procedures."

Respirator Selection – OSHA requires employers to evaluate respiratory hazard(s) in the workplace (contaminant and concentration), identify relevant workplace and user factors, and base respirator selection on these factors. The respiratory hazard evaluation includes, "a reasonable estimate of employee exposures to respiratory hazard(s)." The respirator type or class is then selected by comparing the employee's exposure to the occupational exposure limit and determining the minimum necessary respirator assigned protection factor. Where the employer cannot identify or reasonably estimate the employee exposure, OSHA requires the employer to consider the atmosphere as IDLH.

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Breathe Easy – Establishing a Respiratory Protection Program (Cont.)

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Medical Evaluation – Medical evaluation of the employee is required for mandatory use of all respirators or voluntary use of elastomeric facepieces, and recommended for voluntary use of filtering facepieces.

This is a disposable 'respirator'. Fit testing is required if use is mandatory.

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Fit Testing – Fit testing is required for mandatory use of all tight-fitting facepieces and recommended for voluntary use. OSHA 1910.134(f) states: "The employer shall ensure that an employee using a tight-fitting facepiece respirator is fit tested prior to initial use of the respirator, whenever a different respirator facepiece (size, style, model or make) is used, and at least annually thereafter.

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Respirator Training – Training is required for mandatory use and recommended for voluntary use of respirators. OSHA 1910.134(k) states: "This paragraph requires the employer to provide effective training to employees who are required to use respirators. The training must be comprehensive, understandable, and recur annually and more often if necessary.

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Coming Soon: ISO 45001 – Occupational Health and Safety Management

Currently the International Organization for Standardization, or ISO, is developing a new occupational health and safety (OH&S) management system, or ISO 45001. This new management system is geared toward enabling organizations to proactively improve their OH&S performance by preventing injury and ill-health.

ISO-45001: Defined

- ISO 45001 will be applicable to all organizations regardless of size, type, or nature, and all requirements can be integrated into current management processes. This new standard does not state specific criteria for OH&S performance, nor is it strict about OH&S management system design. Each organization's management system should be specific to meet its own needs in preventing injuries and ill-health. ISO 45001 is not intended to be a legally binding document, it is designed to be a voluntary system used by organizations whose aim is to minimize or eliminate the risk of harm.

ISO-45001: Benefits

- An ISO 45001 based OH&S management system will enable an organization to improve its OH&S performance by establishing systematic processes, which take into account company situation, risks and opportunities, and legal and other requirements. It also determines, minimizes, and eliminates the hazards and OH&S risks associated with organizational activities. ISO 45001 also increases awareness of an organization's OH&S risks, and aids workers to take an active role in OH&S matters to promote an organization's reputation as a safe place to work, which leads to more direct benefits.

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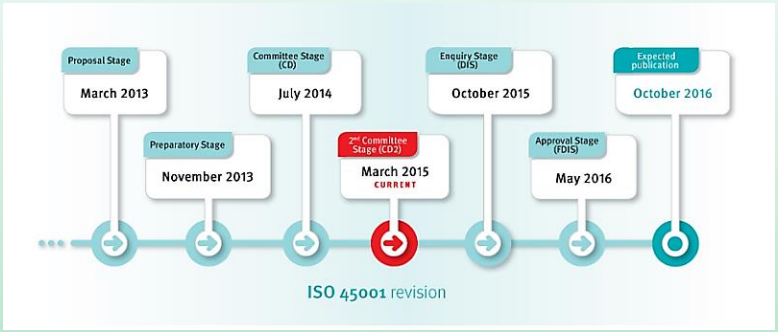
Coming Soon: ISO 45001 – Occupational Health and Safety Management (Cont.)

ISO-45001: Relations to Other Standards

- ISO 45001 follows the high level structure approach that ISO 9001 (quality) and ISO 14001 (environment) apply. While evolving this standard, developers considered other international standards including OHSAS 18001 and the International Labour Organizations (ILO) guidelines, standards, and conventions for ease of integration.

ISO-45001: Timeline

- Currently this standard is in the second review phase, and is slated to be completed by October 2016.



ISO-45001: More Information

- For more information regarding this new occupational health and safety management system, see the links below.
  - Committee developing the standards and its work, ISO/PC 283.
  - High Level Structure, view Annex SL of the ISO Directives
  - Content of the development version, please contact your National Member Body

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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

- **Gas cylinders should be properly secured at all times to prevent tipping, falling or rolling. They can be secured with straps or chains connected to a wall bracket or other fixed surface, or by use of a cylinder stand. Refer to CGA Pamphlet P-1 Safe Handling of Compressed Gas Cylinders.**
- **Train personnel on proper compressed gas storage and handling requirements.**

FINDING

Unsecured Compressed Gas Cylinder in Laboratory

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Golf carts, Mules™, and Gators™ are just a few types of small utility vehicles commonly used for quick, quiet transportation across jobsites and other work areas. But as fun as these utility-carts seem, they can also pose some serious safety hazards if not operated with caution.

From 1990 to 2006 an estimated 147,000 cart-related injuries occurred in the United States with rollovers accounting for 10 percent of all accidents.

If small utility vehicles are used at your place of work, ensure you and your employees are trained on safe cart operation and maintenance to prevent workplace accidents and injuries. A few general safety guidelines are provided below:

- Always wear seat belts and keep arms, legs, feet inside cart
- Drive at safe speeds and stay on paved surfaces when possible
- Wait until passengers are seated and wearing their seat belts before driving
- Take extra caution during bad weather conditions and avoid driving in the snow or ice
- Honk horn when driving around bends, blind corners, down hills and in crowded areas
- Avoid distractions such as cell phones when operating the cart
- Know the maximum weight limits of your cart and do not overload
- Conduct regular inspections and perform immediate repairs; and follow lock-out-tag out procedures for carts considered unsafe to operate.

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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.