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Consider This

HEALTH & SAFETY NEWSLETTER
JUNE 2015

Celebrate and Participate in National Safety Month

OSHA Announces New Rules for Confined Spaces

Conducting a Risk Assessment and Job Hazard Analysis

When You Need a Critical Lift Plan

Captain Obvious

Implementing Stop-Work Authority

Work Safe. Live Safe. Stay Safe.

Celebrate and Participate in National Safety Month

Join the National Safety Council, EHS Support, and thousands of organizations across the country as we work to raise awareness of what it takes to stay safe. Observed annually in June, National Safety Month focuses on reducing leading causes of injury and death at work, on the road and in our homes and communities.

NATIONAL SAFETY MONTH 2015

This June, we are celebrating your passions with the theme of **"What I Live For."** Click on the following topics to be directed to materials you can use to engage your employees, co-workers and family in safety:

- **Prescription painkiller abuse**
- **Transportation safety**
- **Ergonomics**
- **Emergency preparedness**
- **Slips, trips and falls**

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OSHA Announces New Rules for Confined Spaces
(Effective August 3, 2015)

On May 4, 2015, the United States Occupational Safety and Health Administration (OSHA) published a new final rule in the Federal Register intended to increase protection for construction workers in confined spaces (e.g., manholes, crawl spaces, tanks and other confined spaces that are not intended for continuous occupancy).

This rule becomes effective on August 3, 2015 and is intended to match the rules currently in place in the general industry standards. There are five new requirements and several areas where OSHA clarified existing requirements.

The following is a summary of the new requirements for the construction industry:

1. OSHA added detailed provisions requiring coordinated activities when multiple employers are present at a worksite. OSHA intends this new rule will ensure hazards are not introduced into a confined space by workers performing tasks outside the space.
2. OSHA regulations will now require a competent person to evaluate the work site and identify confined spaces, including permit spaces, prior to commencing work.
3. The new regulations will require continuous atmospheric monitoring whenever possible.
4. Likewise, the new regulations will require continuous monitoring of engulfment hazards.
5. Also, permits may be suspended, instead of cancelled, in the event the entry conditions listed on the permit change or an unexpected event requiring evacuation of the space takes place. Before re-entry, however, the space must be returned to the entry conditions listed on the permit.

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As noted previously, provisions were included to clarify existing requirements as set forth in the general industry standards. These clarifications include:

1. **Employers who direct workers to enter a space without using a complete permit system are required to prevent the workers' exposure to physical hazards via methods that eliminate or isolate the hazards through methods such as lockout/tagout.**

2. **Employers relying on local emergency services must arrange for those responders to give the employer advance notice if they will be unable to respond for a period of time (e.g., because the responders are handling another emergency, attending training, etc.).**

3. **Employers are required to provide training to workers in a language and vocabulary that the worker understands.**

Finally, several terms have been added to the "definitions" that are set out in the construction standards. For example, terms such as "entry employer" and "entry rescue" have been added to describe the employer who directs workers to enter a space and to clarify the differences in the types of rescue.

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Conducting a Risk Assessment and Job Hazard Analysis

Identifying hazards and assessing the level of risk associated with those hazards is the most important activity you perform every day, at work and away from work. Effective health and safety management is based on a universal understanding of risks and how to control them through good planning.

A Risk Assessment (RA) is a process that:

- Identifies hazards
- Evaluates the risk of harm from those hazards
- Implements measures to eliminate or control those hazards
- Prioritizes occupations that require job hazard analysis

A Job Hazard Analysis (JHA) is a process that:

- Offers a step-by step approach to recognize, assess and control hazards and monitor the ongoing effectiveness of controls
- Systematically evaluates certain jobs, tasks or processes
- Helps to eliminate or reduce risks or hazards in order to protect workers from injury or illness

Image Source: http://www.ihsa.ca/imgs/smallbusiness/IHSA

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Conducting a Risk Assessment and Job Hazard Analysis (Cont.)

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Conducting a Risk Assessment and Job Hazard Analysis (Cont.)

Infographic Source: http://safetysummit.blr.com/6-steps-of-a-job-hazard-analysis-infographic/

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When You Need a Critical Lift Plan

While there appears to be no precise, all-encompassing definition of a critical lift, some common items consistently appear in the numerous published lists of reasons for a lift to be considered critical. Lists researched for this article were universally presented in a fashion that indicated that any single occurring item in the list would cause the lift to be considered critical.

OSHA Defined Critical Lift

According to OSHA (29 CFR 1926.751) a critical lift means a lift that: (1) exceeds 75 percent of the rated capacity of the crane or derrick, or (2) requires the use of more than one crane or derrick.

No Brain-er Approach

Before presenting the list of commonly appearing reasons for critical lift classification, let's think about the very nature of word “critical” to arrive at a no brain-er approach that should be used in the field. Given safety implications and the risk involved in any lift, some people would argue that every lift to some degree should be considered critical. Aside from this viewpoint however, critical means, if lost, crisis would ensue; critical means urgently needed.

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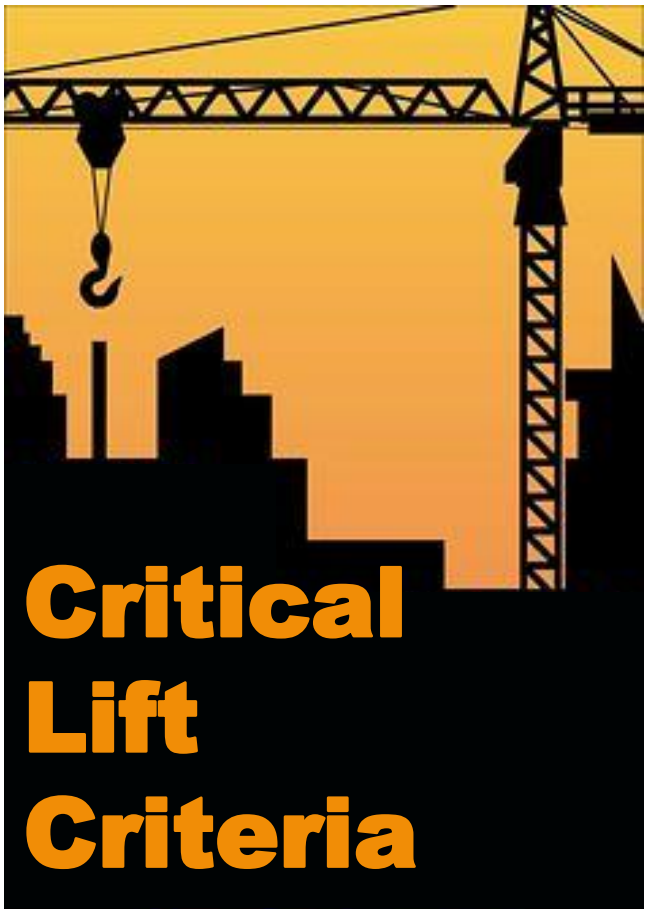
When You Need a Critical Lift Plan (Cont.)



Reference: http://www.rigger.com/articles/safety/critical-lift

So, after reviewing various industry and governmental agency lists, here is the commonly appearing reasons why a lift should be considered a critical lift:

- Loads exceeding 75% of the rated capacity of any one crane
- Personnel lifting
- Loads that will require suspension directly above rigging personnel
- Lifts that result in loads leaving direct view of the crane operator
- Loads that are extremely valuable, irreplaceable, or unrepairable
- Loads that could potentially become damaging to other equipment or utilities
- Loads that are potentially unstable in flight

Other Interesting Reasons

Among other reasons for considering a lift to be critical were these that were developed by industrial interests to satisfy unique requirements:

- Lifting of loads whose replacement (purchasing lead) time exceeded 10 days
- Lifting of loads whose loss would result in plant production shutdown exceeding 10 days
- Lifting of loads whose loss would result in loss of plant production greater than $100,000

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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

- **The rated load of the crane shall be plainly marked on each side of the crane, and if the crane has more than one hoisting unit, each hoist shall have its rated load marked on it or its load block and this marking shall be clearly legible from the ground or floor.**
- **Crane bridges should be labeled with the directional markings to indicate direction of travel (N, S, E, W).**

FINDING

No Rated Load Marked on Overhead Crane

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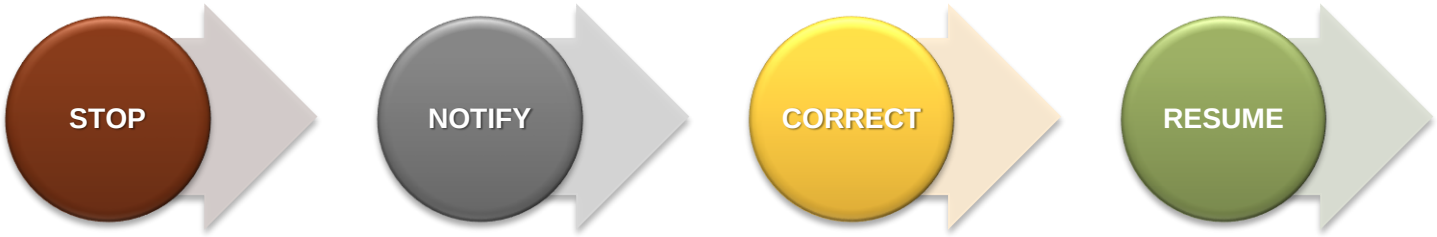
Implementing Stop-Work Authority:
If you see it – Own it!

Stop Work Authority (SWA) is a policy that empowers all workers to shut down operations if a hazardous condition exists or the job is being performed with compromised safety. The intention is to ensure the safety of individuals, equipment, and the environment.

Why SWA works:

- It is engrained as part of the culture
- All levels of the organization understand the importance of SWA
- SWA is implemented regardless of who is performing the work
- Everyone associated with the task or project is asked to step back and evaluate the situation
- Personnel are trained on identifying hazards and unsafe behaviors, notification procedures, implementing corrective actions and resuming work
- Personnel see corrective measures being implemented and a proactive approach
- SWA is approached as “I am intervening because I care about your health and life”
- No retribution is given for the implementation of SWA
- SWA is used only when needed – If used often, a larger problem exists and needs to be evaluated



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Implementing Stop-Work Authority:
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Why SWAs are not adhered to:

- New employees commonly feel uncomfortable raising a concern about a potentially unsafe environment or another's unsafe behavior
- Experienced employees have been doing the job for so long they are willing to take certain risks
- Companies feel it is going above and beyond what is necessary and cuts in to production
- Personnel are not trained properly on the SWA process during new-hire orientation
- Management does not support the SWA policy and therefore they do not reinforce the policy or lead by example
- Worker stopping the job is not supported, therefore, others see SWA as useless
- Corrective actions never get implemented
- What one person considers unsafe or dangerous may be viewed as acceptable and 'part of getting the job done'

If a Stop Work Authority policy is next on your list, call us today for free advice. If your current policy dips into both of the categories above, we will help evaluate the pros and cons.

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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.