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HEALTH & SAFETY NEWSLETTER
SEPTEMBER 2013

EPA Revises VOC Standards

Campus Fire Safety

MOVE IT (Safely)

LIFT IT (Safely)

Off the Job Safety

Hidden Dangers of Aerosol Cans

Work Safe. Live Safe. Stay Safe.

EPA Revises VOC Standards for Oil and Gas Storage Tanks

On August 2, 2013, the U.S. Environmental Protection Agency (USEPA) issued updates to the April 2012 oil and natural gas standards for storage tanks. The rule applies to storage tanks constructed after Aug. 23, 2011 and are used to store crude oil, condensate, unrefined petroleum liquids known as "intermediate hydrocarbon liquids," or produced water. Storage tanks subject to NSPS (have a potential to emit six or more tons of volatile organic compounds [VOC] a year) must reduce emissions by 95 percent. The updates include the following:

- Phase in the date by which storage tanks must install VOC controls
- Establish alternative emission limits for tanks where emissions have declined
- Clarify test protocols for control equipment
- Clarify the types of tanks subject to the rule
- Streamline compliance monitoring requirements to ensure leaks are repaired while USEPA addresses monitoring issues raised in reconsideration petitions
- Adjust requirements for submitting annual reports.

Compliance deadlines include the following:

- Tanks that come online after April 12, 2013 are likely to have higher emissions and must control VOC emissions within 60 days or by April 15, 2014, whichever is later.
- Tanks that came online before April 12, 2013 are likely to have lower emissions and must control VOC emissions by April 15, 2015.

Additional standards of the rule also allow an alternative emissions limit that would permit owners/operators to remove controls from tanks if they can demonstrate that the tanks emit less than four tons per year of VOC emissions without controls for twelve consecutive months. Owners are still required to evaluate emissions monthly to ensure emissions are below four tons.

The docket for this rule is Docket ID No. EPA-HQ-OAR-2010-0505 and can be accessed at http://www.regulations.gov.

For more information about this rule, go to http://www.epa.gov/airquality/oilandgas/actions.html.

EHS Support can help your company by providing expertise for air permit applications, technical support, or auditing.

Please contact our Technical Expert, Peter Okonski at peter.okonski@ehs-support.com or (225)324-1309.

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Campus Fire Safety – *For Those Heading Back to College*

As students go off to college and leave the comforts of home, the Consumer Product Safety Commission (CPSC) is warning about the dangers of fires in college housing such as dormitories, fraternities, sororities, and barracks.

According to National Fire Protection Association data, the estimated number of fires in campus housing has risen dramatically in recent years, from a low of 1,800 fires in 1998 to 3,300 fires in 2005. From 2000 through 2005 there were 39 deaths and nearly 400 injuries.

Fires in college housing is more common during the evening and weekends when students are in their residences. And, while most of the fires are cooking-related (hot plates, microwaves, portable grills, etc.), the majority of fire deaths occur in the bedroom.

Continue to the next page for College Dorm and Off-Campus Housing Fire Safety Tips.

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Campus Fire Safety – For Those Heading Back to College – Continued

College Dorm and Off-Campus Housing Fire Safety Tips:

Fires in both on and off-campus housing are usually preventable. Be aware of your surroundings and take action to eliminate the most common causes of fires. Be especially careful while cooking. Alcohol use is often associated with the actions of people prior to fatal fires in off-campus housing.

- Cooking equipment causes 72% of dorm fires. Students should cook in designated areas only, and never leave cooking equipment unattended when in use.
- As far as deaths and injuries are concerned, most occur in sleeping areas, and are associated with smoking materials like tobacco products, candles, and incense. Always extinguish flames before leaving the room or going to sleep.
- Electrical products, portable heaters, and lighting such as halogen lamps are the source of many dorm fires. Keep combustibles away from heat sources and don't overload electrical outlets, extension cords, and power strips.
- Take special care with holiday and seasonal decorations. Don't use combustible materials and never block access to safety devices, doors, etc.
- Know your building's emergency evacuation plan in case of fire.
- If you hear a fire, wake up others in your room.
- If you see smoke or fire, activate the nearest fire alarm.
- Don't disable smoke alarms and be sure to test smoke detectors at least monthly to be sure they operate and change batteries as needed.
- Flammable fuels like propane or gasoline should never be stored indoors.
- Follow specific dorm rules regarding cooking, smoking and other activities that could cause fire.
- Keep emergency numbers (on and off campus) posted by phones.

Sources: http://www.gocolumbiamo.com/Fire/Educational/dormfires.php, http://reslife.brown.edu/offcampus/fire_safety.html

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MOVE IT (Safely)

Handling material is a daily function in the workplace:
All too often it is a task taken for granted, with little knowledge of or attention to the consequences if done incorrectly. Both management and employees need to look at and evaluate how material goods are handled inside and outside their facilities. No matter what the operation involves, a designated area should be provided for that purpose.

It is important to educate the personnel involved in material handling. They must understand that it is not smart or a good practice to show off their muscles by lifting and carrying very heavy material. Doing so is a common cause of back injuries, and back injuries can remain with someone for the rest of his or her life.

Many times it is not necessary for an individual to lift and carry material manually. Various types of equipment — dolly, cart, lift truck, hoist, and crane — are available to move material safely. Depending on the type of operation, using a dolly and cart to move material can result in minimal disruption of work flow.

How the material or goods are unloaded or loaded is a key factor in reducing employee injuries. People involved in material handling should be able to lift and hold the weight of the material or goods used in their operations. They also must be properly trained in the correct way to lift and carry the items.

Use the tips on the following page to protect yourself when handling materials.

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MOVE IT (Safely) – Continued

MOVING, HANDLING, AND STORING MATERIALS

- When manually moving materials, employees should seek help when a load is so bulky it cannot be properly grasped or lifted, when they cannot see around or over it, or when a load cannot be safely handled.
- When an employee is placing blocks under raised loads, the employee should ensure that the load is not released until hands are clearly removed from the load. Blocking materials and timbers should be large and strong enough to support the load safely. Materials with evidence of cracks, rounded corners, splintered pieces, or dry rot should not be used for blocking.
- Handles and holders should be attached to loads to reduce the chances of getting fingers pinched or smashed. Workers also should use appropriate protective equipment. For loads with sharp or rough edges, wear gloves or other hand and forearm protection. To avoid injuries to the hands and eyes, use gloves and eye protection. When the loads are heavy or bulky, the mover should also wear steel-toed safety shoes or boots to prevent foot injuries if the worker slips or accidentally drops a load.
- When mechanically moving materials, avoid overloading the equipment by letting the weight, size, and shape of the material being moved dictate the type of equipment used for transporting it. All materials handling equipment has rated capacities that determine the maximum weight the equipment can safely handle and the conditions under which it can handle those weights. The equipment-rated capacities must be displayed on each piece of equipment and must not be exceeded except for load testing. When picking up items with a powered industrial truck, the lift truck must never be overloaded because it is harder to control and could easily tip over. Extra weight must not be placed on the rear of a counterbalanced forklift to offset an overload. The load must be at the lowest position for traveling, and the truck manufacturer's operational requirements must be followed. All stacked loads must be correctly piled and cross-tiered, where possible. Precautions also should be taken when stacking and storing material.
- Stored materials must not create a hazard. Storage areas must be kept free from accumulated materials that may cause tripping, fires, or explosions, or that may contribute to the harboring of rats and other pests. When stacking and piling materials, it is important to be aware of such factors as the materials' height and weight, how accessible the stored materials are to the user, and the condition of the containers where the materials are being stored.
- All bound material should be stacked, placed on racks, blocked, interlocked, or otherwise secured to prevent it from sliding, falling, or collapsing. A load greater than that approved by a building official may not be placed on any floor of a building or other structure. Where applicable, load limits approved by the building inspector should be conspicuously posted in all storage areas.
- When stacking materials, height limitations should be observed. For example, lumber must be stacked no more than 16 feet high if it is handled manually; 20 feet is the maximum stacking height if a forklift is used. For quick reference, walls or posts may be painted with stripes to indicate maximum stacking heights.
- Used lumber must have all nails removed before stacking. Lumber must be stacked and leveled on solidly supported bracing. The stacks must be stable and self-supporting. Stacks of loose bricks should not be more than 7 feet in height. When these stacks reach a height of 4 feet, they should be tapered back 2 inches for every foot of height above the 4-foot level. When masonry blocks are stacked higher than 6 feet, the stacks should be tapered back one-half block for each tier above the 6-foot level.
- Bags and bundles must be stacked in interlocking rows to remain secure. Bagged material must be stacked by stepping back the layers and cross-keying the bags at least every ten layers. To remove bags from the stack, start from the top row first. Baled paper and rags stored inside a building must not be closer than 18 inches to the walls, partitions, or sprinkler heads. Boxed materials must be banded or held in place using cross-ties or shrink plastic fiber.
- Drums, barrels, and kegs must be stacked symmetrically. If stored on their sides, the bottom tiers must be blocked to keep them from rolling. When stacked on end, put planks, sheets of plywood, or pallets between each tier to make a firm, flat, stacking surface. When stacking materials two or more tiers high, the bottom tier must be chocked on each side to prevent shifting in either direction.
- When stacking, consider the need for availability of the material. Material that cannot be stacked due to size, shape, or fragility can be safely stored on shelves or in bins. Structural steel, bar stock, poles, and other cylindrical materials, unless in racks, must be stacked and blocked to prevent spreading or tilting. Pipes and bars should not be stored in racks that face main aisles; this could create a hazard to passers-by when supplies are being removed.

Ref: OSHA's Construction Safety and Health Outreach Program - Subpart H.

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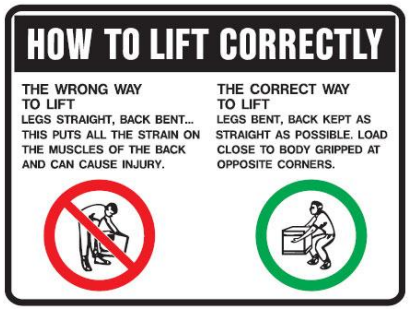
LIFT IT (Safely)



At your next toolbox talk or all-employee safety meeting, ask the following questions…

> *"How many of you have ever injured/strained your back/neck or shoulders while lifting or moving an object?"*
>
> *"How are we addressing safe lifting? Is it working?" If not, "How do you feel we should be addressing safe lifting?"*
>
> *"What are the reasons you or fellow co-workers aren't lifting properly?"*

Typical costs of strains and sprains to backs/shoulders:

Whether it's dull and achy or sharp and stabbing, pain can make it hard to concentrate on the job. Workplace pain affects millions of workers and costs their employers billions of dollars in workers' compensation and lost productivity.

An estimated 186 million work days are lost each year to back pain alone. Pain in the workplace takes a toll on employees as well as employers. One study of workers with low-back pain found that workplace pain challenges were associated with activity interference, negative self-perceptions, interpersonal challenges, and inflexibility of work.

Source: http://www.inthefaceofpain.com/content/uploads/2011/09/factsheet_Workplace.pdf

Need Support in Developing a Functional Capacity Testing Program? Contact our H&S Experts today!

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LIFT IT (Safely) – Continued

How to Avoid Injuries with Proper Lifting – A Simple Review:

1. **Plan ahead before lifting**
   Knowing what you're doing and where you're going will prevent you from making awkward movements while holding something heavy. Clear a path, and if lifting something with another person, make sure both of you agree on the plan.

2. **Size up the Load**
   Determine if you can carry a load comfortably; tip it on its side. Get help if the load is too big or bulky. Check for nails, splinters, rough strapping and rough edges. You will be a stronger, and a more stable lifter if the object is held close to your body rather than at the end of your reach. Make sure you have a firm hold on the object you are lifting, and keep it balanced close to your body.

3. **Lift if Correctly**
   Make sure your footing is solid. Keep your back straight, with no curving or slouching. Center your body over your feet. Lift with your legs, not your back. Move your feet to turn. DO NOT twist your back/hips. Tighten your stomach muscles.

4. **Wear a belt or back support**
   If you are lifting in your job, or often at home, a back-belt may help you maintain a better lifting posture. Remember, back belts/supports do not prevent back injuries, but help with preventing bending of the lower back. Check with physician or physical therapist to ensure a back belt or support is right for you or your personnel.

After you have received the answers to the questions posed to your personnel, review your injury statistics and trends. Determine whether your company is experiencing new occurrences of material handling related strains and sprain issues or still dealing with reoccurring ones. Develop a team of individuals that can assist in evaluating tasks in the facility and field that necessitate manual materials handling. Keep safe lifting practices as a long-term focus and topic during toolbox talks, safety committee meetings, production meetings and safety trainings as well as in newsletters, alerts and postings. Develop a functional capacity testing and pre-placement physical program to ensure new hires/transfers are physically capable of performing required tasks.

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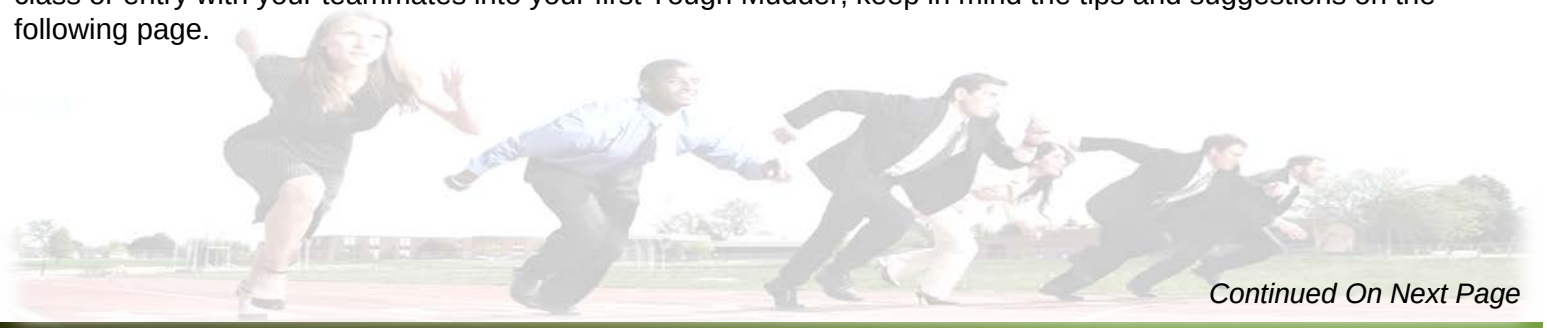
Off the Job Safety – *The Weekend Warrior Syndrome*

To the Employer – Employers and insurance companies pay millions of dollars to men and women who have been injured off the job when participating in some kind of physical activity. Should you encourage your personnel to be physically active? Absolutely. But remind personnel to prepare physically prior to taking on the physical challenge and be sure to remind them that workers' compensation is in place only for those who are injured while performing work. *Reporting off-the-job injuries as work related is fraud*.

Post This for Your Personnel – With football season well under way, softball season in continuation, and hunting season upon us, hospital emergency departments throughout the country see the arrival of thousands of men between the ages of 30 - 55 years. They arrive in ambulances, taxi cabs, and private vehicles to be treated for such injuries as lost teeth, separated shoulders, pulled groins, broken ankles, broken hands, and countless other injuries.

In their prime, many of these men were outstanding athletes or at least in good physical condition. As the years flew by, their bodies succumbed to time and the abuse they had put them through, or the much needed time to workout and stay physically fit has been replaced with work and coaching T-ball. They have lost their speed, flexibility, and resiliency to injuries. The one thing they haven't lost is the memories of their greatness. This is why a man who may be forty pounds overweight and has done nothing for the past six months but drink beer and barbecue steaks will accept the challenge of a two-day softball tournament, an impromptu 4-wheeler ride for 60 miles, the yearly aggressive climb up the mountain, and play or hunt as if his livelihood depends on his ability to score a point or bag the elusive 20-point. These activities aren't the only instances where injuries happens; there are weekend warriors in any sport or activity.

This sounds primarily geared towards men, but ladies, you are not left out either. Prior to your first 1-hour Zumba class or entry with your teammates into your first Tough Mudder, keep in mind the tips and suggestions on the following page.



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Off the Job Safety – The Weekend Warrior Syndrome – Continued

- ✓ **Keep Things In Perspective**
  Keep this thought in mind. If you're not making your living in professional sports, you probably don't have to take the game too seriously.
- ✓ **Prepare For Your Sport**
  The most common mistake is to get out there and do too much, too fast. When you get the time, break your sessions into smaller, more frequent increments.
- ✓ **Warm-up for All Activities**
  Whether it's hockey, skiing, baseball or jogging; it is important to warm-up before you start. Stretch those muscles and gradually build up your endurance. If professional athletes do it, shouldn't you?
- ✓ **Wear The Proper Gear**
  Just as we tell our children to wear their helmets when riding their bicycles or roller blading; it's important that we do the same. In some sports more equipment is needed other than a helmet. Obtain and wear the protective gear that is recommended for the sport.
- ✓ **Keep Your Ego In Check**
  As your children age, they usually get stronger and more fit. Before you know it they can run circles around you or throw you around in a play wrestling match. Accept it. Sooner or later they will surpass you in physical abilities. Don't let your ego make you do things you'll be sorry for later.
- ✓ **Listen To Your Body**
  When you are involved I these activities and your body starts to ache or you feel you have pulled something, stop. Apply ice and visit your doctor if the pain persists. Remember, if you ever have chest pain no matter how slight it may be, seek medical help immediately, you may be having a heart attack.

These are just a few tips to keep in mind. And remember if you are too sore for the next game, it's no big deal. Have fun. Claiming off-the-job injuries under workers' compensation is fraud.

Sources: http://phys.org/news205598089.html and http://www.safety-speaker.com/safetyarticles.html

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Hidden Dangers of Aerosol Cans

Workers face three general types of hazards when working with aerosol cans. The first of these is the pressurization. As long as the can and the dispensing device remain intact, aerosol cans are safe. But any number of problems, such as a puncture, a faulty valve, excessive temperatures, or corrosion can result in unintended depressurization. In the most severe cases, aerosol cans may explode, burning nearby workers and showering them with steel shrapnel.

The second hazard is the actual product being dispensed by the can. Often, these products are inherently hazardous, such as in the case of insecticides. Others may contain hazardous substances, such as the concentrated solvents found in some paints or cleaners. In fact, some cans that are partially empty may be legally considered to be hazardous wastes. Finally, if either the propellant or the product it delivers is flammable, the aerosol can creates a fire hazard.

Safe Work Practices:
As with most hazards, the first steps in reducing the dangers associated with aerosol cans is to eliminate their use in the workplace where possible. If workers do use aerosol cans, they should be familiar with the Safety Data Sheets (MDSs) for the material and use the cans according to directions. Personal protective equipment or additional ventilation may be required.

Aerosols, when kept in overheated conditions, can become volatile and explosive. Many aerosol cans, whatever the contents, warn explicitly against keeping them in areas where the temperature reaches 120 degrees F or more. During the summer, the inside of a car can reach 130 degrees F or hotter. At these temperatures, aerosols become over-pressurized and can explode at any time. Aerosol cans should always be stored in dry areas where they will not be exposed to excessive temperatures.

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Hidden Dangers of Aerosol Cans – Continued

Disposal:
Leftover materials in partially filled cans may qualify as hazardous waste. If a can is found to be inoperative or malfunctioning, returning it to the supplier will prevent the user from having to treat it as hazardous waste.

Cans that are completely empty of both propellant and product are not considered to be hazardous waste, and may be recyclable. Companies that use a significant number of aerosol cans may wish to consider aerosol-puncturing equipment, which allows the contents of cans to be safely removed and prepared for disposal.

Things to consider when disposing of aerosol cans:

- If there are leftovers in the can, consider using the product up, or giving it to someone else who can use it.
- Cans that contain hazardous wastes should be placed in a closed container indicating that the waste is hazardous. The labeling should indicate the type of waste and the date when the container began to be used. Keep records of when and how the waste was disposed or recycled.
- Due to explosion hazards, aerosol cans should never be placed in/near fires or heated locations.
- Pressurized cans should never be punctured or compacted without the proper equipment. Puncture or compaction of a container under such great pressure could not only lead to serious injury, but environmental exposure of the contents of the container.

State and Local Hazardous Waste Disposal Locations:
Remember: Empty aerosol cans are safe for the trash; however, leftovers should be brought to a local Household Hazardous Waste Collection Site. To find the collection site nearest you, contact your county's solid waste management office or search by zip code at the following link: http://earth911.com/recycling/aerosol-cans/

Sources: http://www.safetymanagementgroup.com/articles/The-Hidden-Dangers-of-Aerosol-Cans.aspx, http://www.doityourself.com/stry/car-safety-dangers-of-aerosols-in-vehicles, http://www.rethinkrecycling.com/blog/how-properly-dispose-aerosol-cans

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What are Workers Compensation Class Codes?

Many Employers have polices with incorrect class codes costing them hundreds or thousands of dollars more in premium for their workers compensation coverage.

What is a Workers Comp classification code? A class code is a four digit code assigned by NCCI in order to differentiate between the various job duties or scope of work performed by employees. This classification system contains over 700 unique codes and is the basis for underwriting and pricing workers compensation coverage.

NCCI Class Codes:
One of the primary components of pricing workers' compensation insurance is classifying a risk or workplace exposure within the proper NCCI work comp class code. Incorrect risk classification by insurance agents and/or underwriters often results in premium that is too high, or conversely, lower premium that is reclassified at the time of audit creating a large audit bill due.

In most states, the classification system used is one devised and maintained by NCCI, the National Council on Compensation Insurance. NCCI is an independent advisory organization largely funded by the insurance companies who utilize their statistical analysis data. NCCI's function is to develop and provide the statistical data used to set manual rates for workers compensation and to develop individual employers' experience modifier based on a ratio of claims to premium paid.

Non NCCI Jurisdiction States:
There are a few states that do not use the NCCI classification system. California, New Jersey, New York, Delaware, and Pennsylvania are states that have their own classification systems. Texas licenses much of the NCCI system, but makes significant variations in specific classification rules. Many other states have some "state special" classifications that can vary significantly from NCCI definitions for certain workplace exposures.

For more detailed information, visit https://www.ncci.com/NCCIMain/Pages/Default.aspx

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Encouragement for those of you who are tasked with managing your health and safety program.

As you sit in the office and look out your window (hoping you have one) and see the beautiful September weather outside, you may have that urge to walk out on the shop floor or drive to the project site and see what is happening. The doors of the shop are propped wide open and a breeze is flowing in. At the jobsite the sun is not frying your skin and personnel are in good moods as the weather is cooperating for the day's activities. You are then greeted with, "Long time no see!" A face riddled with sarcasm all over it stares right at you. Taken off guard you reply with, "What do you mean?" As he responds with great detail and cynicism at this grand opportunity to respond that you have never shown up when it has been rainy and cold, your mind is flooding with self-check questions:

- ***Does he think that I only leave my office on nice days?***
- ***When was the last time I engaged face to face with shop/site personnel?***
- ***Does he think that I don't care?***
- ***Do I portray myself as one that doesn't have enough time to listen to the concerns of personnel at all levels?***

This scenario may be a true occurrence for you as a safety pro…or even you who is an executive of your organization. I encourage you to get out there on the nice, and not-so-nice days and engage personnel. Some of the best action items come from one on one interaction and dialog. There are seasoned individuals who have gained a voice in your company that have no problem speaking up at any time, but there are others who are not that comfortable in speaking in front of others during meetings or training sessions. You may gain a ton of insight from seeing first-hand what is happening on the dreary days as well as from the new hires, the 2nd or 3rd shifters, the office personnel, etc. Don't be a 'closed door fair weather' safety pro.

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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.