

Safety Training Companies are
Required to Have

*Safety Compliance Associates,
LLC*

Objectives

- Training sessions will:
 - Identify the type of training is required for employee(s)
 - Identify the training requirements for OSHA 2013 Top 10 Most Frequently Cited Standards

Training Obligation

- More than 100 OSHA standards require training in the safety and health aspects of their jobs.
- Reflect OSHA's belief that training is an ESSENTIAL part of every employers safety and health program.

What OSHA Requires

OSHA requires documentation:

- Review by OSHA Compliance Officer
- Assures that initial or periodic training is accomplished with established time frames.

Safety Training Does OSHA Require Annually?

- General Industry 29 CFR 1910 rules include annual retraining of employee:
 - Access to employee exposure and medical records
 - 29CFR1910.1020
 - Bloodborne Pathogens – 29CFR1910.1030
 - Fire Brigades – 29CFR1910.156
 - Fixed Extinguishing Systems 29CFR1910.160
 - Grain Handling Facilities 29CFR1910.272
 - HAZWOPER 29CFR1910.120

Safety Training does OSHA Require Annually

- Mechanical Power Presses – 29CFR1910.217
- Occupational Noise – 29CFR1910.95
- Permit – Required Confined Space – 29CFR1910.146
- Portable Fire Extinguishers – 29CFR1910.157
- Respiratory Protection – 29CFR1910.134

Top 10 Most Frequently Cited Standards 2013

- Fall Protection (C) 1926.501
- Hazard Communication 1910.1200
- Scaffolding (C) 1926.451
- Respiratory Protection 1910.134
- Electrical 1910.305

Top 10 Most Frequently Cited Standards 2013

- Powered Industrial Trucks 1910.178
- Ladders (C) 1926.1053
- Lockout/Tagout 1910.147
- Electrical, General Requirements 1910.303
- Machine Guarding 1910.212

Fall Protection

- Train everyone to use the equipment safely
 - Falls can be prevented when workers understand proper set-up and safe use of equipment, so they need to be training on specific equipment they will use to complete the job.
 - Employers must train workers in hazard recognition and the care and safe use of:
 - Ladders
 - Scaffolds
 - Fall protection systems
 - Other equipment they'll be using on the job

Fall Protection

- OSHA enforces regulations in 1926, Subpart M for Construction, which require fall protection must be provided at 6 feet in Construction
- Falls from ladders, scaffolds and roofs can be prevented and lives can be saved through three simple steps:
 - Plan
 - Provide
 - Train

Fall Protection

- Important – Regardless of the fall distance, fall protection must be provided when working over dangerous equipment and machinery

Training Requirements for Fall Protection Standard 1926.503

- Retraining:
 - Employee does not understand and skill required
 - Changes in the workplace render previous training obsolete;
 - Changes in the types of fall protection systems or equipment to be used render previous training obsolete;
 - Inadequacies in an affected employee's knowledge or use of fall protection systems or equipment indicated that the employee has not retained the requisite understanding or skill.

Lack of Fall Protection No Guardrail



No Guardrail Around Platform



Hole



Fall Protection

Temporary Anchor Points Missing



No Guardrail Around Floor Opening



Wire Rope



Improper Barricade at an Elevator Shaft



Reason for Fall Protection Training



Fall Protection

- # 1 on OSHA's Top 10 Most Frequently Cited Standards for FY 2013.
- 8,241 violations written (2013)
- 7,250 violations written (2012)
- The employer shall provide a training program for each employee exposed to fall hazards.
- Recognize the hazards of falling and shall train each employee in the procedures to be followed in order to minimize these hazards.

Hazard Communication

- New hire – prior to actual work exposure
- Training is event driven and not an annual requirement:
 - Upon initial assignment
 - Then whenever a new physical or health hazard is introduced.

Hazard Communication

- Information required:
 - The standard's requirements
 - The operations where hazardous chemicals are present
 - The location and availability of the written HCP, including the lists of hazardous chemicals, and Safety Data Sheets (SDS)

Hazard Communication

- Training Requirements
 - How to detect the presence or release of hazardous chemical in the work area
 - The physical and health hazards of the chemicals
 - The measures to take to protect themselves from the hazards
 - The details of the employer's HCP

Old Lab Chemicals In Storage



Oil Not Properly Stored



Proper Training?



Good Storage Practices?



Hazard Communication

- #2 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 6,165 violations (2013)
- 4,696 violations (2012)
- Failed to have a written program
- Provide adequate employee education and training
- To properly label (or have any label on) container
- Provide workers with access to safety data sheets.

Scaffolding

- Competent person is someone who has broad knowledge of worksite safety and health issues, capable of identifying existing and predictable worksite hazards, and who has management approval to control the hazards.
- Competent person can supervise, moving, or dismantling scaffold at a worksite.

Scaffolding

- Training Requirements: Employer shall have each employee who performs work while on a scaffold trained by a person qualified in the subject matter to recognize the hazards associated with the type of scaffold being used and to understand the procedures to control or minimize those hazards.

Scaffolding

- Training shall include:
 - The nature of any electrical hazards, fall hazards and falling object hazards in the work area;
 - Correct procedures for dealing with electrical hazards and for erecting, maintaining, and disassembling the fall protection systems and falling object protection systems being used;
 - The proper use of the scaffold, and the proper handling of materials on the scaffold;

Scaffolding

- Training (cont'd)
 - The maximum intended load and the load – carrying capacities of the scaffolds use; and
 - Any other pertinent requirements of this subpart.
 - Trained by competent person who is involved in erecting, disassembling

Scaffolding

- Employer shall have each employee who is involved in erecting, disassembling, moving, operating, repairing, maintaining, or inspecting a scaffold *trained by a competent person* to recognize any hazards associated with the work in question. The *training shall include* the following topics, as applicable:

Scaffolding

- The nature of scaffold hazards;
- Correct procedures for erecting, disassembling, moving, operating, repairing, and inspecting, and maintaining the type of scaffold in question;
- The design criteria, maximum intended load – carrying capacity and intended use of the scaffold;
- Any other pertinent requirements of this subpart.

Scaffolding

- When the employer has reason to believe that an employee lacks the skill or understanding needed for safe work involving the erection, use or dismantling of scaffolds, the employer shall *retrain each such employee* so that the requisite proficiency is regained. *Retraining* is required in at least the following situations:

Scaffolding

- Where changes at the worksite present a hazard about which an employee has not been previously trained; or
- Where changes in the types of scaffold, fall protection, falling object protection, or other equipment present a hazard about which an employee has not been *previously trained; or*
- Where inadequacies in an affected employee's work involving scaffolds indicate *the employee has not retained the requisite proficiency.*

Need for Scaffold Training



Poor Condition of Planking



Not Fully Planked/Multiple Scaffolding



Clutter



Scaffolding With No Fall Protection



Scaffolding Collapse



Scaffolding

- #3 On OSHA's Top 10 Most Frequently Cited Standard for 2013
- 5,423 violations (2013)
- 3,814 violations (2012)
- Problems with scaffold construction
- Improper worker access
- Lack of guardrails

Respiratory Protection

- Training and Information
 - Train all employees who are required to use respirators
 - Train prior to required workplace respirator use.
 - Must be comprehensive
 - Provide the information in the standard's Appendix D to employees who *voluntarily* wear respirators; can be oral or written

Respiratory Protection

- Training occurs at least annually and covers:
 - Why the respirator is necessary
 - How improper fit, usage, or maintenance can compromise effectiveness
 - Respirator limitations and capabilities
 - Respirator use in emergencies
 - How to inspect, put on and remove, use – and check the seal
 - Maintenance and storage

Respiratory Protection

- Relevant medical signs and symptoms
- The general requirements of the respirator standard
- Retraining must occur annually or when the following situations occur:
 - Changes in the workplace or the type of respirator make previous training obsolete
 - Perceived inadequacies in the employee's knowledge or use of the respirator
 - Other situations that may impact safe respirator use

Respiratory Protection

- Employer must *establish and implement those elements of a written respiratory protection program.*
- Employer shall designate a *program administrator who is qualified by appropriate training or experience.*
- The employer shall provide respirators, *training*, and medical evaluations at no cost to the employee.

Lungs with Silicosis



Dry Cutting Concrete Not Wearing Appropriate Respiratory Protection



Improper Respiratory Protection/Not Trained



Sanding Drywall/Not Trained



Dry Cutting Without Respiratory Protection



Respiratory Protection

- #4 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 3,879 Violations (2013)
- 2,731 Violations (2012)
- No written respiratory protection program
- Poor fit test procedures
- Unsuitable respirator selection process
- Not having procedures for voluntarily use of respirators

Electrical

- #5 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 3,245 Violations (2013)
- 2,371 Violations (2012)
- Problems with flexible cords
- Boxes and temporary wiring
- Poor use of extension cords
- Use of temporary wiring as permanent wiring

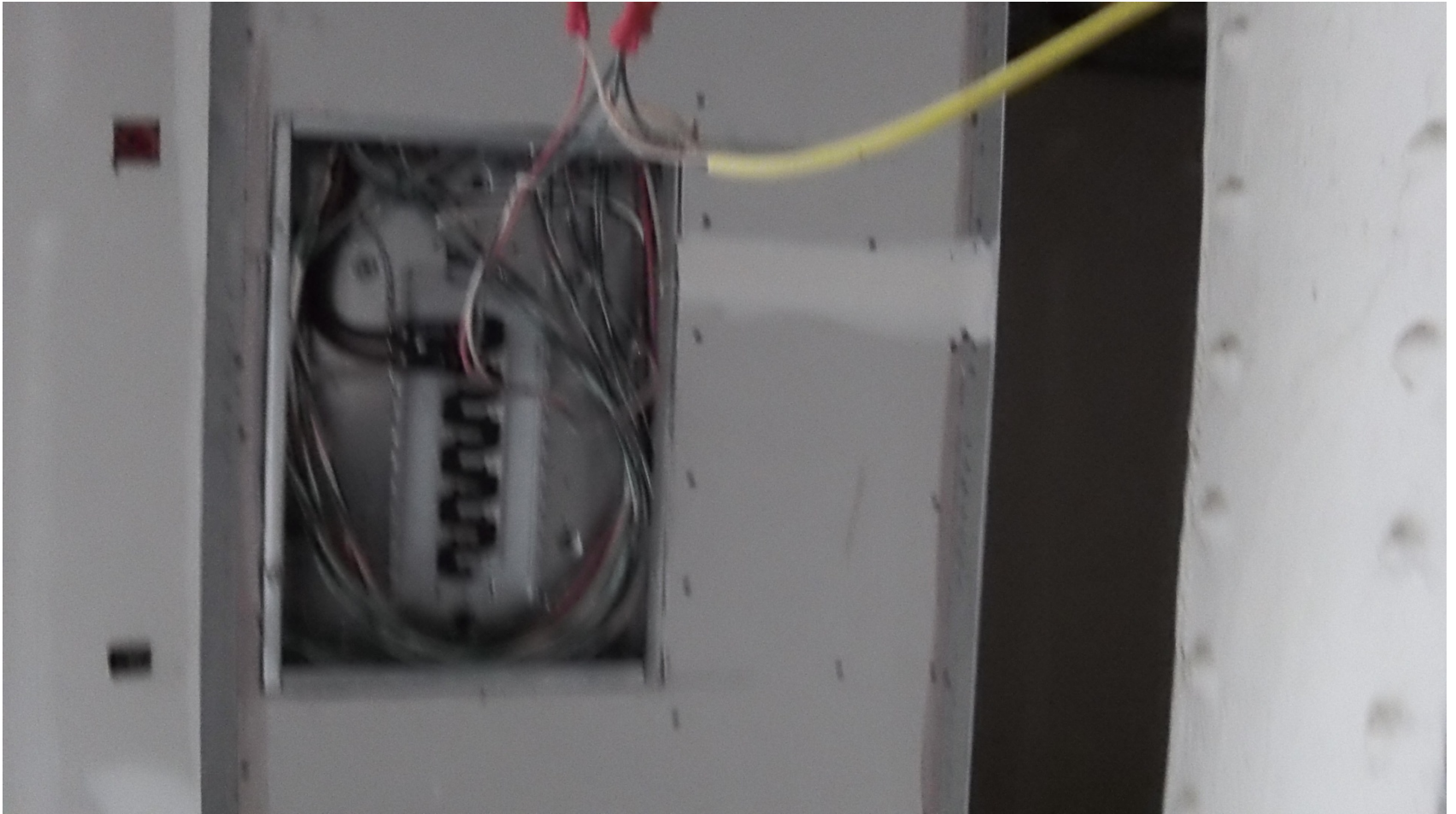
Electrical



Electrical Safety?



Electrical Safety?



Extension Cord on Job Site



Electrical (Wiring)

- #5 On OSHA's Top 10 Most Frequently Cited Standard for 2013
- 3,425 Violations (2013)
- 2,371 Violations (2012)
- Problems with flexible cords and cables
- Boxes and temporary wiring
- Poor use of extension cords
- Use of temporary wiring as permanent wiring

I Guess We Missed the Last Training
Class!!



Powered Industrial Truck

- Training:
 - Combination of formal instruction (lecture, discussion, interactive computer learning, video tape, written material)
 - Practical training (demonstrations performed by the trainer and practical exercises performed by the trainee)
 - Evaluation of the operators performance in the workplace

Powered Industrial Truck

- Training and evaluation shall be conducted by persons who have the *knowledge, training, and experience to train* PIT operators and evaluate their competence.
- Training Program Content – initial training
 - Operating instructions, warnings, and precautions for the types of truck the operator will be authorized to operate;

Powered Industrial Truck

- Workplace related topics
- Refresher Training
 - Operator vehicle in unsafe manner
 - Involved in an accident or near miss incident
 - Evaluation that operator is not operating the truck safely
 - Assigned to drive different type of truck
 - Condition in workplace changes affect safe operation of truck

Excellent Training of Employees?



Need Retraining



Powered Industrial Truck

- #6 on OSHA Top 10 Most Frequently Cited Standard for 2013
- 3,340 Violations (2013)
- 1,993 Violations (2012)
- Inadequate operator training and refresher training
- Poor condition of trucks when returned to service after repair

Ladders

- Training requirements
- The employer shall provide a *training program for each employee using ladders and stairways*, as necessary. The program shall enable each employee to recognize hazards related to ladders and stairways, and shall *train each employee* in the procedures to be followed to minimize these hazards.

Ladders

- The employer shall ensure that each person has been *trained by a competent person* in the following areas, as applicable:
 - The nature of fall hazards in the work area;
 - The correct procedures for erecting, maintaining, and disassembling the fall protection systems to be used;
 - The proper construction, use, placement, and care in handling of all stairways and ladders

Ladders

- The maximum intended load – carrying capacities of ladders and
- The standards contained in this subpart
- Retraining shall be provided for each employee as necessary so that the employee maintains the understanding and knowledge acquired through compliance with this section.

Step ladder in closed position



Extension Ladder Not Secured



An Electrician working on Closed Step Ladder



Ladder with Broken Rung



Step Ladder Use the Proper Side



Standing the Wrong Way/On Top Step



Ladders

- #7 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 3,311 violations (2013)
- 2,310 violations (2012)
- Damaged side rails
- Using top ladder step
- Using a ladder not suitable for the job
- Placing excessive loads on ladders

Lockout/Tagout

- Why training?
 - So they understand the purpose of the energy control program
 - So that employees acquire the knowledge and skills necessary for the safe application, usage and removal of the energy controls.

Lockout/Tagout

- Different levels of training for three categories of employees:
 - Authorized employees must receive training on recognition of:
 - Applicable hazardous energy sources
 - Type and magnitude of the energy available in the workplace
 - Methods and means necessary for energy isolation and control

Lockout/Tagout

- Affected employees must receive training on the purpose and use of the energy control procedure
- Other employees (whose work activities are or may be in an area where energy control procedures may be utilized) must be instructed about the procedure and about the prohibition relating to attempts to restart or reenergize machines or equipment that are locked out or tagged out.

Lockout/Tagout

- Training Requirements:
- Frequency: No annual requirement for formal training once it has been given initially (*at least annual mandatory “periodic inspection” involving reviews of energy control procedures that apply to job assignments.*) When it should occur next occur is “event driven” and is addressed by 1910.147 (c) (7) (iii).

Lockout/Tagout

- Reasons for retraining
 - A change in job, equipment, or processes that present a new hazard
 - A change in the energy control (lockout/tagout) procedures
 - Evidence of deficiencies in knowledge or practice (e.g., at the periodic inspections.)

Poor Lockout/Tagout Procedures



Control of Hazardous Energy

Lockout/Tagout

- #8 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 3,254 violations (2013)
- 1,744 violations (2012)
- Poor or no energy control procedures
- Inadequate worker training

Electrical

- Training is for the worker to understand the hazards associated with energized electrical work and earn the designation as being qualified.
- Hazards –
 - Potential electrical shock
 - Arc flash and thermal burns
 - Arc blast

Electrical

- In addition, qualified persons to receive training to be familiar with:
 - The proper use of special precautionary techniques
 - PPE including arc-flash suit selection, use and limitations
 - Insulating and shielding materials
 - Insulating tools and test equipment

Electrical

- Additional Training and Retraining
 - If the person is observed to not be following the rules and regulations, i.e., the safety-related work practices.
 - If new technology, or new types of equipment or changes in procedures necessitate the use of safety-related work practices that are different from those the employee normally uses.
 - If the employee must use safety-related work practices that are not customarily used during their regular job duties.

Electrical

- If an employee who has been trained to perform a task has not performed that task in more than 1 year.
- Retraining shall be performed not to exceed three (3) years.
- CPR training
- AED training
- First Aid
- Contacting emergency personnel

Electrical Safety Principles

It's Just 40 Little Words

- Plan every job
- Anticipate unexpected events
 - Identify the hazard
 - Minimize the hazard
- Use procedures as tools
- Use the correct tools for the job task
- Use personal protective equipment
 - Isolate the equipment
 - Assess people's abilities
 - Protect the person
 - Audit these principles

Arc Flash Burn



Electrical Flash Burns



What Happens When You Are Working HOT



Arm with third degree burn from
high-voltage line.

Electrical

- # 9 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 2,745 violations (2013)
- 1,572 violations (2012)
- Electrical Shock
- Electrocution Exposure

Machine Guarding

Thorough operator training should involve instruction or hands-on training in the following areas;

- Parts and functions of the machine
- Basic operator controls
- Operator responsibilities

Machine Guarding

- Safe guarding:
 - A description and identification of the hazards associated with the machine
 - How to use safeguards and why
 - How and under what circumstances safeguards can be removed, and by whom (repair or maintenance personnel only)
 - What to do (contact the supervisor) if a safeguard is damaged, missing, or unable to provide adequate protection

Machine Guarding

- This training is necessary for new operators and maintenance or setup personnel, when any new or altered safeguards are put into service, or when workers are assigned to a new machine or operation.

Machine Guarding

- #10 on OSHA's Top 10 Most Frequently Cited Standard for 2013
- 2,701 violations (2013)
- 1,332 violations (2012)
- Point of operations exposure
- Inadequate or no anchoring of fixed machinery
- Exposure to blades

References

- Concise Guide to Workplace Safety and Health
Gary Chambers
- The OSHA Training Answer Book, 2nd Edition
Mark Moran
- OSHA website
- National Safety Council

Questions

- ***Safety Compliance Associates, LLC***

OSHA/PERRP Compliance

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