

MRCRA Conference

What is Contained in a Great Safety Program?

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Safety Program Topics

1. *Disciplinary Policy for Safety Violations*
2. *Training and Communication*
3. Near-Miss/Accident/Injury Reporting
4. Accident Investigation Procedures
5. *Competent Persons*
6. *Qualified Persons*
7. Sanitation and Potable Water
8. *Job-Site Hazard Recognition*
9. *Fall Protection*
10. *Personal Protective Equipment*
11. *Hazard Communication*
12. *Stairway and Ladder Safety*
13. *Emergency Action Plan*
14. Medical Services and First Aid
15. *Heat Illness Prevention Program*
16. Cold Injury Prevention Program
17. *Electrical Safety*
18. Hand Tools, Power Tools, and Equipment
19. Housekeeping

Safety Program Topics

20. Material Storage and Disposal
21. Motor Vehicles and Mechanized Equipment
22. Material Handling Equipment
23. Distracted Driving/Working Policy
24. Protection from Falling Objects
25. Fire Protection and Prevention
26. *Flammable and Combustible Liquids*
27. Confined Spaces
28. Access to Medical and Exposure Records
29. Aerial Lifts
30. Scaffolds (Including Scissor Lifts)
31. Cranes
32. Welding, Cutting, and Brazing
33. Illumination
34. Noise/Demolition/Asbestos
35. Respirable Crystalline Silica
36. Written Exposure Control Plan
37. Hot Work with Kettles

Training Leads the List of Important Topics for your Safety Program

DO IT RIGHT

DOCUMENT

Training Should Include at a Minimum:

- Orientation - Test/Quiz
- Weekly - Toolbox Talks
- Daily - Briefings - Following JSA
Pre-Task Plans

Fall Protection

- Standard Guardrails
- Parapet walls at least 39 inches high
- PFAS
- Warning lines with: Safety monitoring system
PFAS, guardrails

But, before you go there, be sure you have
compliance with

1926.501(a)(2)

in your safety plan

Fall Protection - Key Points

Copying the OSHA standard word for word into your safety program does not get the job done.

1. You need to develop a fall protection program for your company.
2. Before you can do number 1, you need to understand the requirements yourself.
 - a) Only conventional fall protection may be used unless you qualify under 1926.501(b)(2) for a fall protection plan. Many contractors feel that they can always fall back on a fall protection plan under 1926.502(k) when conventional fall protection is too much trouble.
 - i. Plan is appropriate if you are doing leading edge work, pre-cast concrete work, or residential roofing.
 - ii. Conventional fall protection must be technically not feasible or create a greater hazard.
 - iii. Must still protect employees.

Fall Protection - Key Points

1926.501(b)(2)(i)

Each employee who is constructing a leading edge 6 feet (1.8m) or more above lower levels shall be protected from falling by guardrail systems, safety net systems, or personal fall arrest systems. Exception: When the employer can demonstrate that it is infeasible or creates a greater hazard to use these systems, the employer shall develop and implement a fall protection plan which meets the requirements of paragraph (k) of 1926.502.

1926.501(k)

“Fall protection plan.” This option is available only to employees who engage in leading edge work, precast concrete erection work, or residential construction work (See 1926.501(b)(2), (b)(12), and (b)(13)) who can demonstrate that it is infeasible or it creates a greater hazard to use conventional fall protection equipment. The fall protection plan must conform to the following provisions.

Fall Protection - Key Points

3. Conventional fall protection 1926.501(b)(10)
 - a) PFAS.
 - b) Guardrails
 - c) Safety nets
 - d) Warning Lines with:
 - i. PFAS
 - ii. Guardrails
 - iii. Safety nets
 - iv. Safety monitors

Fall Protection - Key Points

4. 1926.501(b)(1)

“Unprotected sides and edges.” Each employee on a walking/working surface(horizontal and vertical surface) with an unprotected side or edge which is 6 feet (1.8m) or more above a lower level shall be protected from falling by the use of guardrail systems, safety net systems, or personal fall arrest systems.

Fall Protection - Key Points

5. 1926.501(b)(10)

“Roofing work on Low-slope roofs.” Except as otherwise provided in paragraph (b) of this section, each employee engaged in roofing activities on low-slope roofs, with unprotected sides and edges 6 feet (1.8m) or more above lower levels shall be protected from falling by guardrail systems, safety net systems, personal fall arrest systems, or a combination of warning line system and guardrail system, warning line system and safety net system, or warning line system and personal fall arrest system, or warning line system and safety monitoring system. Or, on roofs 50-feet (15.25m) or less in width (See Appendix A to subpart M of this part), the use of a safety monitoring system alone [i.e. without the warning line system] is permitted.

Practical Advice

- Competent person
 - ✓ Requirement - 1926.20(b)(2) frequent and regular inspections
 - ✓ OSHA “spin” - If you have a safety violation of just about any standard you have also violated 1926.20(b)(2)
- Safety monitoring system
 - ✓ 1926.500(b) - A competent person is responsible for recognizing and warning employees of fall hazards.
 - ✓ 1926.501(b)(10)- “..... a combination of warning line systems and safety monitoring system.....”

Practical Advice

- ✓ 1926.502(h) - Safety monitoring system
- ✓ 1926.502(h)(1) - “.....employer shall ensure that the safety monitor complies with the following requirement.....”
- ✓ 1926.501(h)(1)(i) - The safety monitor shall be competent to recognize fall hazards
- ✓ 1926.501(h)(1)(ii) - The safety monitor shall **warn** the employee when it appears the employee is unaware of a fall hazard or is acting in an unsafe manner.

Fall Protection Training

1926.503(a)(1) - The program for each employee who might be exposed to fall hazards shall enable each employee to recognize the hazards of falling and shall train each employee in the procedures to minimize these hazards.

1926.503(a)(2) - Employees will be trained by a competent person, qualified in:

- The nature of fall hazards in the work area
- The use and operation of guardrail systems, PFAS, safety net systems, warning line systems, safety monitoring systems, and controlled access zones
- The role of employees in fall protection plans
- The standards contained in this subpart (Subpart M)

Competent/Qualified Persons

Know the difference

Your competent person will be interviewed during an inspection

Competent/Qualified Persons

1926.32(f) - *Competent person* means one who is capable of identifying existing and predictable hazards in the surroundings or working conditions which are unsanitary, hazardous, or dangerous to employees, and who has authorization to take prompt corrective measures to eliminate them.

1926.32(m) - *Qualified person* means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated his ability to solve or resolve problems relating to the subject matter, the work, or the project.

Ladder Safety

NIOSH APP

- 4:1 Slope
- Tied-off
 - ✓ 36 inches
 - ✓ 19 inches

Heat Illness Prevention

OSHA states water/rest/shade

-BUT-

NIOSH Criteria Document

- Acclimatization
- Work/rest
- Hydration
- Cooling-off areas
- Training

Hazard Communication

Train to read SDS and labels

- Labeling program
 - ✓ Permanent containers
 - ✓ Temporary containers
- SDS program
- Person in-charge for company

PPE

- Hazard Assessment
- Inspection
- Wearing correctly

Safety Enforcement

- Non-supervisors
- Supervisors
 - ✓ Their violations
 - ✓ Permitting employees to work in violation of safety rules

Safety Enforcement

Non-supervisors

- ✓ Verbal warning - Recorded - Retrained
- ✓ Written warning - Recorded - Retrained
- ✓ 3-Day suspension - Recorded - Retrained
- ✓ Termination

One calendar year cycle

-OR-

5-Step or 6-Step

Safety Enforcement

Supervisors

- ✓ Written warning - Recorded - Retrained
- ✓ 5-Day suspension - Recorded - Retrained
- ✓ Termination

-AND/OR-

Supervisor who permits his/her employees to work in violation of safety rules

- ✓ Demotion with loss of any bonuses or incentives for minimum of three months

Questions?

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