

LET'S TAKE A LOOK AT YOUR SAFETY COMPLIANCE

Frame Building Expo
Louisville, Kentucky
February 22-24, 2023

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Your Goals

- You need and want to keep your workers safe
- You need to comply with OSHA standards
- Your safety program & work rules need to be understandable

Three Questions

1. Do you have a written Safety Program?
2. Does it cover all potential hazard exposures for your employees?
3. Does it contain details on:
 - Safety training?
 - Safety enforcement?
 - Drug & alcohol-free workplace rules?

1926.20(b)

Accident prevention responsibilities.

1926.20(b)(1)

It shall be the responsibility of the employer to initiate and maintain such programs as may be necessary to comply with this part.

1926.20(b)(2)

Such programs shall provide for frequent and regular inspections of the job sites, materials, and equipment to be made by competent persons designated by the employers.

Competent Person

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.

1926.20(b) (cont.)

Accident prevention responsibilities.

1926.20(b)(3)

The use of any machinery, tool, material, or equipment which is not in compliance with any applicable requirement of this part is prohibited. Such machine, tool, material, or equipment shall either be identified as unsafe by tagging or locking the controls to render them inoperable or shall be physically removed from its place of operation.

1926.20(b) (cont.)

Accident prevention responsibilities.

1926.20(b)(4)

The employer shall permit only those employees qualified by training or experience to operate equipment or machinery.

1926.21(b)(2)

The employer shall instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his work environment to control or eliminate any hazards or other exposure to illness or injury.

NFBA Safety Manual Template

A Guide for the Post-Frame Industry

CONTENTS

Message from the President	2	Qualified Persons	9
General Safety Practices	3	Sanitation and Potable Water	10
Safety Compliance Employee Pledge and Employee's Rights	4	Reporting of Near Misses, Accidents, and Injuries	11
Disciplinary Policy for Safety Violations	5	Job-Site Hazard Recognition	12
Training and Communication	6	Fall Protection	13
Accident Investigation Procedures	7	Personal Protective Equipment	22
Competent Persons	8	Hazard Communication	23
		Stairway and Ladder Safety	25
		Emergency Action Plan	27

NFBA Safety Manual Template (cont.)

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CONTENTS

Medical Services and First Aid	28	Distracted Work Policy	46
Heat Illness Prevention Program	29	Protection from Falling Objects	47
Cold Injury Prevention Program	32	Fire Protection and Prevention	48
Electrical Safety	34	Flammable and Combustible	
Hand Tools, Power Tools, and		Liquids	49
Equipment	36	Confined Spaces	51
Housekeeping	39	Access to Medical and	
Material Storage and Disposal	40	Exposure Records	52
Motor Vehicles and Mechanized		Aerial Lifts	53
Equipment	41	Scaffolds (Including Scissor Lifts)	55
Distracted Driving Policy	45	Cranes	58

NFBA Safety Manual Template (cont.)

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CONTENTS

Trenching and Excavation	63
Welding, Cutting, and Brazing	66
Sample Orientation Exam for New Employees	67
Answer Key to Sample Orientation Exam for New Employees	70

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So, You have a Safety Manual.....

Are you in Compliance?

NO



The language in your Safety Manual
must be

DIRECTIVE – NOT SUGGESTIVE

Ladder Safety – Key Points

Wrong

- Employees “should not” carry anything in their hands when ascending or descending a ladder, if they do not feel they can do safely.

Correct

- Employees SHALL not.....

Ladder Safety – Key Points (cont.)

Wrong

- Do not set ladder up outside a door that opens outward unless door is blocked.

Correct

- Do not set ladder up outside a door that opens outward.

-OR-

“Unless you have the only key,” which places you under
1926.21 (b) (2)

Ladder Safety – Key Points (cont.)

Wrong

- All ladders will be inspected at least one time a week or one time a month.

Correct

- All ladders will be inspected before each use.

Heat Illness Prevention – Key Points

Wrong

- Employees should acclimate to hot temperatures.
- We will have water on-site and employees should drink water when they feel they need it.
- Site Supervisor will recommend that employees take a rest break when they begin to feel the ill effects of a hot environment.
- We will provide shade.
- Employees will be trained on the dangers of working in a hot environment.

READ THE TITLE OF THE SLIDE

Distracted Driving

Wrong

- Employee should not use their mobile phones while driving if they feel their use will create a hazard.

Right

- Employees SHALL NOT use their mobile phones while driving.

Hand Tools

Wrong

- Employees should not drop start a chain saw.

Right

- Employees SHALL NOT drop start a chain saw.


Personal Protective Equipment

Wrong

- Employees should wear all required PPE, unless they feel it will create an additional hazard.

Right

- Employees SHALL wear all required PPE.



Only the Site Supervisor or the Safety Director may make an exception to ANY safety rule, but only when compliance is technically not feasible or will create a greater hazard.

-AND-

Only when they can provide an effective means of making employees safe.

Variance

29 CFR Section 1905.10

Competent vs. 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.

Competent vs. Qualified Persons (cont.)

1926.32(m)

Qualified 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.

Competent vs. Qualified Persons (cont.)

Scaffolding

- Designed by a “Qualified Person”
- Erected, moved, modified, or dismantled by a “Competent Person”

Competent vs. Qualified Persons (cont.)

Fall Protection Plan

- Prepared by a “Qualified Person” and site specific
- Changes approved by a “Qualified Person”
- Implementation under supervision of a “Competent Person”

Drug-Free Workplace Program

Failure to have one
General Duty Clause?

Let's Debunk Some Myths


- If I give my employees PPE, it is up to them to wear it, my responsibility has ended.
- After I have provided a safety orientation, my obligation to train has been fulfilled.

Let's Debunk Some Myths (cont.)

- I can rely on my site safety person to ensure safety compliance on the jobsite.
 - ✓ Full-time safety
 - ✓ Site Supervisor (full-time supervisor)
 - ✓ Site Supervisor (working supervisor)

Let's Debunk Some Myths (cont.)

- If I cannot economically comply with an OSHA standard, I can do whatever I think is necessary to protect my employees.



You, the owner and/or the corporate entity,
are 100% responsible to ensure safety
compliance 100% of the time, on every jobsite.

QUESTIONS?

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