

A Guide for New Plant Safety Managers

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By Dr. Barbara Boroughf

The Complete Guide for New Plant Safety Managers

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Things have been changing quickly in the manufacturing industry lately. Because of downsizing, “right-sizing,” and budget cuts, people with little or no background in safety are now becoming the new plant safety person with little or no training or preparation. Because this move has become increasingly common at the plant level, we put together this ebook to serve as a guide for those first months in this new role. Through seven practical and insightful sections, we provide the tools and confidence necessary to embrace and excel in a new role as the Plant Safety person.

Don't Worry, We'll Walk You Through It

You aren't alone in working towards your organization's safety goals—this simple roadmap will assist you in becoming the knowledgeable and informed safety person the plant has needed for a long time. Even a seasoned safety person will get some great tips and reminders.

Topics covered include: general plant safety responsibilities and background, building a health and safety team, handling OSHA regulations and protocols, and Personal Protective Equipment (PPE) rules.

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About the Author



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Surprise--You Are the New Plant Safety Person! Now What?

Much to your surprise, you have suddenly become the new plant safety person. And on top of that, you have little or no background in safety! Unfortunately with downsizing/right-sizing and budget cuts, this kind of move has become increasingly common at the plant level, despite the importance of EHS to the operation.

Instead of thinking you were in the wrong place at the right time, think of this as an opportunity—as actually being in the right place at the right time. Rather than feeling overwhelmed with your new job title and associated tasks, you can start working your way towards becoming a well-informed, knowledgeable safety person by following a few simple steps.

LET'S START AT THE VERY BEGINNING

The most important step of becoming the new plant safety person is to understand your role. You may or may not have been provided a job description when you were identified as the plant safety person. In general, the basic safety requirements are the same no matter the size of your manufacturing facility.

Understanding your roles and responsibilities is of paramount importance and is a good place to start in understanding what is expected of you. Responsibilities may vary depending on the organization; however, your overarching goal is to create a safe working environment that is free from recognized hazards.

Some of your responsibilities may include (but are not limited to):



Examining workplace conditions to make sure they conform to applicable OSHA standards.



Establishing or updating operating procedures and communicating them so that employees follow safety and health requirements.



Assessing education and training needs, and evaluating and recommending appropriate safety programs to ensure employees are provided with the best possible training and education in order to perform their jobs safely. Providing the safety training in a language and vocabulary workers can understand is crucial.



Conducting accident investigations to ensure the root cause is identified and corrected to prevent a recurrence.



Developing and implementing written programs as required by OSHA standards, and training employees on the contents of the written programs.



Keeping records of work-related injuries and illnesses using the appropriate OSHA forms and complying with posting requirements.



Analyzing plant injury/illness data to determine trends and implementing corrective action to reduce the number of injuries/illnesses.



Making sure employees have and use safe tools and equipment and ensuring the equipment is properly maintained.



A complete list of Employer Responsibilities as defined by OSHA can be found on their website. Also, check with your corporate office to gain an understanding of company-specific objectives that may be important to your role.

USE WHAT (AND WHO) YOU KNOW

Keep in mind, you do not have to go it alone! Recognize that the same management principles and practices that you applied to plant production, operating costs, and quality systems also apply to safety. For instance, where supervisors enforce operating rules, they also enforce safety rules; where they solve production problems, they can assist in solving safety problems; quality issues may also identify safety issues, and so on.

As you move forward, try not to feel overwhelmed with your responsibilities. Start with the basics, remember there are resources (like this one) to help you achieve success, and most of all, don't be afraid to ask questions. While you begin to feel more comfortable in your new role, it's time to get your team on board.

Getting Health and Safety Buy-In: Where and How to Start

Reality has set in, and it's time to start moving forward with figuring out how to become the capable and informed safety person that your plant needs.

First things first: in order for you to succeed in your new role and improve plant safety, you need to ensure you have commitment from the plant manager, or whoever is the highest ranking person at the plant location.

COME TOGETHER

Commitment from and communication with the plant manager is of utmost importance, so an early step in your new role is to take a deep breath, set up a meeting with this person, and begin a dialogue to gain an understanding of their past and current support for health and safety in the plant.

Remember that you should inform your own supervisor that you want to meet the plant manager, because support for your success is of vital importance. If your supervisor wants to tag along...great, EHS improvement is a team effort!

PREP TALK

If you have never had a one-on-one meeting with the plant manager, you may find your first meeting to be a little awkward. Don't let that intimidate you! This meeting is one of the most important meetings you will have in your new role, but with a few simple steps you can be confident and well-prepared.



SCHEDULE THE MEETING IN ADVANCE.

Even though the plant manager may have an open door policy, you should schedule a sit-down meeting, to reserve time for a discussion of health and safety expectations. Remember that the plant manager has many direct reports and a lot on their plate every day, so don't schedule an afternoon-long introduction meeting. Thirty minutes should be ample time—you want to be concise, efficient, and respectful of their time.

**DETERMINE YOUR OBJECTIVE FOR THE MEETING.**

A good first objective could be to introduce yourself as the new plant safety person and share your ideas regarding the support and commitment you need in order to assist you in your new role.

**STAY ON TARGET WITH YOUR OBJECTIVES.**

Although it is polite to start with small talk, get to the point early. The meeting is brief, by design, to preserve the plant manager's time - don't let your thoughts and conversation drift away from the purpose of the meeting.

**PREPARE TO LISTEN.**

Understand that while you are new to the Health and Safety role, Health and Safety is not 'new' in the plant. The Plant Manager may have a unique understanding of Health and Safety needs, requirements, and history of the plant. Learn from it!

**DETERMINE AHEAD OF TIME WHAT QUESTIONS YOU WANT TO ASK.**

You may be very lucky and the plant manager may immediately agree that their role is to support you, communicate with you, and set a good example when on the shop floor. They may also already have clear expectations of what they need from you.

If, however, you are not that lucky, you will need to ask for a commitment by sharing your specific requests with the plant manager. The expectations below have been shown to have a positive impact on safety organizations. (Many other items could be included in the list, but this is a good start for your first meeting.)

Your objective is to share these expectations with the plant manager and ask for their commitment to:

- Meeting with you regularly (daily/weekly) to discuss relevant activities and issues.
- Providing visible personal demonstrations of support by discussing safety in staff meetings and by periodically participating in safety committee meetings.
- Reviewing accident investigations in staff meetings, supporting corrective actions, and providing financial commitment as necessary.
- Setting a good example by wearing personal protective equipment where required and following floor rules. (Remember what Albert Einstein said: "Setting an example is not the main means of influencing others, it is the only means.")
- Discussing good or bad safety behavior with associates while walking through the production area.
- Assuring that budgets include provisions for appropriate personal protective equipment, technical support, and employee training.



ONWARD AND UPWARD

At the conclusion of the meeting, your goal is to have gained a commitment from the plant manager to work with you and support you in future activities to create a safe and healthy working environment for all employees.

Now that you have identified expectations and received plant manager buy-in, it is time to prepare for some more challenges in your role.

When OSHA Comes Knocking

So you just left your first one-on-one plant manager meeting and you are on cloud nine! You received the commitment you requested from the plant manager and you are so relieved that the meeting was successful.

Then your supervisor comes into your office, sits down in front of your desk, and begins a serious conversation about how OSHA is a frequent visitor to the plant. She tells you these visits frequently cause confusion throughout the organization because no one knows what to do. Your supervisor no sooner begins talking, though, when her phone rings and off she runs to a meeting, leaving the discussion unfinished.

Now that you are alone in your office, you can't help but think your supervisor's next comment was going to be that it is your responsibility to ensure management is prepared for the next OSHA visit. This scenario marks the all-important step three in your journey to excel as a new plant safety person, so let's make sure you're ready.

WHY OSHA MAY COME KNOCKING

Each year OSHA conducts tens of thousands of inspections, with that number increasing by at least 300 in 2016 alone, so it is always important to have a well thought-out plan. OSHA inspection categories are listed below, in the order of priority:

- Imminent Danger
- Fatality or Catastrophe
- Complaint or Referral
- Programmed Inspection
- Special Emphasis Programs: National/Regional/Local
- Follow-up

(This [OSHA Fact Sheet](#) provides more specific information on OSHA inspections.)

THE OSHA COMPLAINT PROCESS

As the plant safety person, you need to be aware that employees may file a complaint with OSHA via several different channels--online, by fax, by mail, or over the telephone. (Find additional information on the complaint process [here](#).)

Once received, OSHA will prioritize the complaint based on its severity. For lower-priority hazards, OSHA may telephone the plant and follow up with a fax describing the alleged safety and health hazards. The employer must respond in writing within five working days noting corrective actions taken or planned. However, depending on the complaint, the OSHA inspector may also determine an inspection is necessary.

Now that you know why OSHA may visit, it's time to get prepared! This post specifically addresses pre-inspection preparation and procedure. A future post will dive deeper into what to do when your inspector actually arrives.

PRE-INSPECTION PREPARATION

1. Start Things Off Right: Whether you have a receptionist to greet and direct visitors or whether you have a phone with plant contacts clearly posted, it is important to instruct the first person that has contact with the OSHA compliance officer about the procedure to follow. If you do not have a receptionist, identify a number to call if a Compliance Officer arrives at the plant. For instance the phone contact list could state: "OSHA visitors please contact this number".

The number listed must have 100% coverage during working hours and the person answering the phone should know to contact the plant safety person immediately if the caller is an OSHA compliance officer. A backup safety person should be identified to take into account absences related to off-site meetings, vacations, sick leave.

2. Location Matters: The pre-inspection procedure should identify the location where the compliance officer will be escorted to discuss the purpose of the visit and conduct an opening conference. The best location is a conference room, but an alternate area must be identified in case all conference rooms are busy.

3. Keep Confidentiality in Mind: Ensure you are aware of sources or areas of confidential trade secret information prior to an inspection and document this in your procedure. Check with your corporate EHS office or company legal counsel to determine how this should be addressed. One way to handle this is to confirm with the inspector that photographs of confidential areas or documents will be noted as trade secret in the OSHA file.

4. Determine Representatives: State in your pre-inspection procedure who will represent the workers and accompany the OSHA inspector during inspection. If there are one or more unions, each union will choose a representative. Typically the union representatives will be part of the inspection only when the inspection is in their area. If not represented by a union, employees may choose a representative. (Note that the employer never chooses the worker representative.)

Your pre-inspection procedure should also identify individuals in management who will participate in the inspection. These representatives should be knowledgeable about the plant's operations and it is always a good idea to have someone from maintenance be part of the management team that accompanies the inspector.

5. Assign Roles: List the names of the individuals in the pre-inspection procedure who will be the management spokesperson, the person responsible for taking notes during the walk through inspection (including listing all employees and supervisors interviewed), and the person responsible for taking photographs and videos at the same location and angle the inspector does. List backups to account for absences relating to off-site meetings, vacations and sick leave. Once the employees are identified, ensure each knows their role.

6. Locate Relevant Records: Know the location of applicable records such as the OSHA log and supplemental forms for the past five years and written programs including Hazard Communication, Control of Hazardous Energy, Confined Space, Industrial Hygiene sampling reports, and training records. (NOTE that this is a limited list and OSHA may request other items.) Make certain all information is up-to-date and readily accessible, and provide information to OSHA only upon request. In your pre-inspection procedure, state where the information is located.

7. Make the Corporate Connection: Check with your corporate EHS person and determine if you are required to notify anyone within the corporate office that an OSHA compliance officer is at your plant. If you are required to make notification, list their names and contact numbers in your pre-inspection procedure.

AN OUNCE OF PREPARATION...

It is important to ensure the information contained in the pre-inspection procedure remains up-to-date. When individuals leave the company or change jobs internally, the document must be updated immediately. Also, establishing a specific review cadence of quarterly or twice a year is important.

Documenting the seven points listed above in a pre-inspection procedure and ensuring all individuals are aware of their role will minimize confusion should OSHA come knocking, and being prepared is half the battle. Next, we will go over what to do and what to expect when OSHA actually arrives at your plant.

What To Do When OSHA Arrives

You have been the new plant safety manager for a little over two months. During this time you've had the opportunity to review the limited number of safety procedures left in your office by your predecessor and you are beginning to move forward with your safety responsibilities by following the requirements in the procedures.

As part of the Plant Manager's commitment to safety you have had regularly scheduled meetings with the plant manager to discuss relevant plant activities. Additionally, you have written a standard for "When OSHA Comes Knocking", so you know your organization is ready. Just when you think you are starting to get a grasp on your new role and you are feeling pretty relaxed, you receive a phone call from the receptionist....OSHA has just arrived!

Following the procedure you wrote, you are well prepared for OSHA's visit, so don't panic. This post will highlight what to do and what to expect when OSHA arrives.

FIRST THINGS FIRST

Step 1. As detailed in post three, request that the receptionist escort the compliance officer (CO), without delay, to the pre-determined conference/meeting room.

Step 2. Ask the receptionist to contact the Plant Manager and the team you identified in your procedure for OSHA visits and request they report to the conference room to meet with the CO.

Step 3. Notify your Corporate Group that OSHA has arrived and follow their instructions, if any.

The three steps listed above should be done expeditiously. As a general rule, the CO should not be kept waiting for more than 15 minutes. If members of your team are in meetings, the OSHA visit takes priority.

An OSHA visit can typically be broken down into four parts: opening conference, records review, walk-around inspection, and closing conference. We'll cover the first two parts today, and be back on Wednesday with the remaining two.

OPENING CONFERENCE

Listen and Learn

Once team members have been assembled, the CO will conduct an opening conference. He or she will show official credentials to those present, including a photo ID with a serial number. During the opening conference, you should introduce the members of your team and identify who is the designated contact with whom the CO should coordinate all activities.

During the opening conference, the CO will explain the purpose and scope of their visit. You will learn if the inspection is due to imminent danger, fatality or catastrophe, complaint or referral, programmed inspection, special emphasis program, or follow up. (A programmed inspection is aimed at individual workplaces that have experienced high rates of injuries or illnesses, or at specific high-hazard industries.)

The opening conference is also a time to learn what the CO wants to see or do. Make sure you focus on listening during the opening conference and don't volunteer information.

Setting Ground Rules

If the complaint could involve trade secret areas, confirm with the CO that photographs taken of the area or confidential documents relating to the area will be noted as trade secret in the OSHA file.

Inform the CO of the personal protective equipment required during the facility walk-through and request that they follow these requirements. Ensure that all members of your team accompanying the inspector also have the required protective equipment and follow plant safety rules.

Once you have a sense of what the inspector is there for, don't be afraid to challenge the scope of the inspection. If the inspection is due to a complaint and it appears the CO is attempting to expand the investigation beyond the contents of the complaint, reiterate the contents of the complaint and keep the inspector focused.

Don't be afraid to ask questions, but remain calm and polite. Questions you may want to ask include:

- What are the next steps in the inspection?
- How long does the CO expect to be at the facility?

Document, Document, Document

Remember to take copious notes of everything discussed during the opening conference and retain the notes for future reference. If the visit is the result of a complaint, ask to have a copy of the complaint. Note that the identity of the individual(s) issuing the complaint is confidential and will not be seen on the document.

RECORDS REVIEW

The CO will ask for certain documents to review--as a general rule, do not volunteer documents that are not specifically requested. Documents that are typically requested include those that are required to be kept and maintained by an OSHA standard such as: Injury and Illness Records, written Hazard Communication Program, written Control of Hazardous Energy Program, and documentation of the training required by various OSHA standards.

If the CO asks for records that are not required by an OSHA standard, contact your Corporate Safety Department or your legal counsel for direction.

Keep the CO focused. If the visit has been triggered by an employee complaint, only records that are related to that complaint should be requested and provided. For instance, the Control of Hazardous Energy written program should not be requested for a complaint about lack of hearing protection.

Make certain the records you provide are complete and up-to-date. Remember that records must be produced in a timely manner; therefore it is important to know the location of all required OSHA written programs and records. If these records are not produced in a timely manner, citations and/or penalties may result. Ensure you keep a copy of all records provided to OSHA.

WHAT'S NEXT?

Once you've had your opening conference and done the records review, it's time to head out into the facility for the walk-around inspection. Read on for a full overview of what to expect, and how to be prepared.

When OSHA Arrives

Let's take a look at the remaining two portions of the visit—the walk-around inspection and the closing conference.

WALK-AROUND INSPECTION

If the inspection is a programmed inspection, the objective of the walk-around inspection is to ascertain if the facility is complying with OSHA standards. Ensure that your pre-designated team accompanies the inspector at all times, as the CO should never be allowed to walk the facility alone.

Keep detailed notes about the plant areas toured, equipment viewed, and comments made by the CO. If the CO asks questions, answer the question honestly, but do not admit you are aware of an unsafe condition or a violation. Team members should take photographs or video from the exact location the CO takes photos or video.

If OSHA's visit has been triggered by an employee complaint, the CO should be escorted to the area where the complaint arose by taking the most direct route, to avoid line-of-sight violations. Remember to keep the CO focused on the specific complaint.

OSHA has the right to interview employees during the inspection process. The employer representative cannot listen to the interview; the employer does have the right to ask what was discussed, but answers are voluntary. A list of the names of any non-management employees interviewed should be created. Video or audio recording the interview made by the CO is allowed only with consent of the employee.

Management employees may be interviewed and the company has the right to have a representative present during the interview.

CLOSING CONFERENCE

Upon completion of the inspection, the CO will hold a closing conference. The team that participated in the walk-around inspection should be present at this time.

During the closing conference, the CO will advise the team of all conditions and practices which may constitute a violation. You should expect the specific section or sections of the standard which may have been violated to be identified. The CO does not have the authority to issue citations or penalties-- authority for issuing citations and proposed penalties rests with the Area Director or a representative.

During the closing conference, the CO will obtain from the employer an estimate of the time required to abate the alleged violation(s) and take such estimate into consideration when recommending a time for abatement.

Keep in mind, the closing conference is not the time to disagree or debate the proposed citations...this is the time to listen. Statements made by the company representative during the closing conference may affect the decision regarding whether to issue a citation, as well as the characterization of the citation and the extent of the proposed penalty.

You may ask a question for clarification but do not argue with the CO. If there is a factual misstatement, the company representative should politely clarify. The CO will use the closing conference to explain contest procedures and provide an estimated timeframe of when to expect the results of the inspection.

Ensure detailed notes of all discussions during the closing conference are taken and retained for future use. Most importantly, after the CO leaves the facility, provide an update to your Corporate Safety Department.

VOTE OF CONFIDENCE

Congratulations! You've made it through your first OSHA visit. Knowing what to do when OSHA arrives is a big step as you progress in your role as the new plant safety manager. At some point in your career, you may receive an OSHA citation--but don't worry, we will prepare you for that too.

So You've Received an OSHA Citation...

OSHA recently conducted a wall-to-wall inspection of your plant. During the close out conference, you were informed that your plant was in violation of certain OSHA standards. While the compliance officer (CO) does not have the authority to issue citations or penalties-- the final authority lies with the OSHA Area Director--the CO stated that, should OSHA choose to issue citations and financial penalties, you should expect correspondence within a few weeks. [NOTE: OSHA must generally issue citations within six months of the occurrence of any violations.]

After six long weeks of anxiously awaiting the final outcome of the inspection, the plant manager notifies you the results have arrived. The correspondence is handed off to you, which marks another first in your role as the new plant safety person! This chapter will highlight the steps you should take after an OSHA citation arrives.

READ AND POST THE CITATION

First, read the citations and all related documents immediately. There are specific timeframes for certain actions; therefore, time is of the essence. Ignoring these documents may only make things worse. This is the time for you to notify your Corporate Office that you have received correspondence from OSHA with citations and financial penalties.

The law requires that a copy of the Citation and Notification of Penalty must be posted immediately at or near each violation. If this is not possible, due to the nature of the plant operations, post where it will be readily observable by all affected employees.

The citation must remain posted until the violations have been abated, or for 3 working days (excluding weekends and federal holidays), whichever is longer. The penalty dollar amounts are not required to be posted, and may be marked out or covered up prior to posting.

SCHEDULE A MEETING TO REVIEW

The team that participated in the OSHA wall-to-wall inspection should reconvene. The objectives of the meeting are:

- Identify each location, machine, process, and document referenced in the citations, check for accuracy and gain an understanding of the citations.
- Review abatement dates and confirm ample time to comply. Never let an abatement date elapse without notification to OSHA.
- Note the proposed financial penalties.
- Determine, as a team, if there are inaccuracies in the findings. For example, the CO may have stated control of hazardous energy training was not performed for certain employees but you presented documentation during the records review showing the individuals in question were trained.

DETERMINE IF AN INFORMAL CONFERENCE SHOULD BE SCHEDULED

After the citation review team has reviewed and discussed all documents, once again contact your Corporate Office to discuss if an informal conference should be scheduled with OSHA.

If an informal conference is desired, you must meet with the Area Director during the 15 working day contest period. Also, you are required to post a Notice to Employees next to the Citation and Notification of Penalty as soon as the time, date, and place of the informal conference have been determined.

The documents you received from OSHA will include a form which can be completed and used for the posting. The meeting will either be scheduled at the OSHA Area office or via teleconference.

Remember, if you request an informal conference you should schedule it early enough to allow time to contest after the informal conference, should you decide to contest.

It is important to keep in mind that a written letter of intent to contest must be submitted to the OSHA Area Director within 15-working days of your receipt of citations. The timeframe of the contest period is not interrupted by an informal conference. You must be thoroughly prepared to explain your reasoning for adjustment of citations and/or abatement dates.

The objective of the informal conference is to present any evidence which you believe support an adjustment to the citations and/ or penalties or to enter into a settlement agreement which may amend financial penalties, classifications of citations, or abatement dates.

TO CONTEST OR NOT TO CONTEST

The employer has the right to contest all citation items, or only individual items. You may also contest proposed penalties and/or abatement dates without contesting the underlying violations. It is recommended you check with your Corporate Office to assist in making a decision to enter into a formal contest.

Keep in mind that unless you inform the Area Director in writing that you intend to contest the citations and/or proposed penalties within 15 working days after receipt, the citations and the proposed penalties become a final order of the Occupational Safety and Health Review Commission.

If you choose not to contest the violations, you must notify the OSHA Area Office that you have taken appropriate corrective action within the timeframe set forth and include an abatement certification or documentation. A typical abatement certification would contain:

- Inspection number
- Citation number and item number
- Date corrected
- Brief description of corrective action (consider including pictures as evidence)
- A statement similar to: "I attest that the information contained in this document is accurate and that the affected employees and their representatives have been informed of the abatement activities describe in this certification."
- Signature, typed name, and date.

PAYMENT OF PENALTIES

Penalties are due within 15 working days of receipt of the Citation and Notification of Penalty unless contested. The citation material will provide specific guidance on payment.

NOTE: As of August 2, 2016 OSHA Penalties were adjusted. Any citations issued by OSHA on or after this date will be subject to the new penalties if the related violations occurred after November 2, 2015.

Type of Violation	New Maximum Penalty
Serious	\$12,471 per violation
Other-Than-Serious	\$12,471 per violation
Failure to Abate	\$12,471 per day beyond the abatement date
Willful or Repeated	\$124,709 per violation

You should now have an understanding of the actions that must be taken after you receive notification from OSHA on penalties and violations found during your wall-to-wall inspection. Make certain you read all documents provided by OSHA, post the citations, pay attention to the abatement dates, consult with your team and evaluate settlement alternatives. Remember... time is of the essence!

Next up, ways to avoid common OSHA citations in the future...

Frequently Cited General Industry OSHA Violations And How to Avoid Them

The flurry of activity that occurred when your facility received citations after your recent OSHA wall-to-wall visit has finally let up. Following the process explained in the last chapter, you posted the citations and the team reviewed each citation to gain understanding. Now there are abatement dates that must be met.

As you and your team start work correcting the violations, you begin to feel distraught--you worked hard getting safety processes in place as the new plant safety person. You are disappointed with the outcome of the wall-to-wall and you wonder if the citations are unique to your facility and what you can do differently to avoid citations in the future.

HOW DOES MY FACILITY STACK UP? AND HOW DO I LOOK FOR GAPS IN MY PLANNING?

Taking a look at the most frequently cited OSHA violations can offer some perspective. Each year OSHA announces its Top Ten Most Cited Violations for the previous fiscal year (October 1 through September 30). The listing includes both Construction Industry Standards (29 CFR 1926) and General Industry Standards (29 CFR 1910). (NOTE: OSHA uses the term “General Industry” to refer to all industries not included in agriculture, construction or maritime.)

As a manufacturing facility, pay particular attention to the 29 CFR 1910 citations contained within the listing. However, be aware there are circumstances when a general industry facility may fall under Construction Industry Standards. OSHA’s regulations define construction work as construction, alteration, and/or repair, including painting and decorating. (You should check with your legal counsel to determine if construction industry standards apply to your circumstances.)

We will focus on the most frequently cited OSHA violations in General Industry which, during fiscal year 2016, accounted for 7 out of 10 most frequently cited violations. To gain a complete understanding of each standard, refer to the full text via OSHA.

To determine how your facility compares, answer the questions below, with “yes” answers indicating compliance. For each “no,” refer to the full text of the standard to learn more and to determine how to close the gap and avoid a future citation.

AND MOST-CITED GENERAL INDUSTRY STANDARDS ARE...**Hazard Communication (29 CFR 1910.1200)**

- ☐ 1910.1200(e)(1) Do you have a written hazard communication program?
- ☐ 1910.1200(g)(1) If you are a chemical manufacturer or importer, have you obtained or developed a Safety Data Sheet (SDS) for each hazardous chemical produced or imported?
- ☐ 1910.1200(g)(8) Do you have a SDS for each hazardous chemical in your facility? Are SDS's readily accessible?
- ☐ 1910.1200(h)(1) Is employee training on hazard communication provided at time of initial assignment?
- ☐ 1910.1200 (h)(3)(iv) Does training include details of the hazard communication program?

Respiratory Protection (29 CFR 1910.134)

- ☐ 1910.134(c)(1) Have you developed and implemented a written respiratory protection program, and is it updated to reflect changes in the workplace?
- ☐ 1910.134(c)(2)(i) Do you provide respirators to employees upon their request or do you allow them to use their own respirators? If so, have you determined the use will not create a hazard?
- ☐ 1910.134(d)(1)(iii) Have you identified and evaluated respiratory hazard(s) in the workplace?
- ☐ 1910.134(e)(1) Before an employee is fit tested or required to use a respirator, do you provide a medical evaluation?
- ☐ 1910.134(f)(2) Do you provide a respirator fit test before initial use when an employee uses a tight-fitting face piece respirator?

Lockout/Tagout (29 CFR 1910.147)

- ☐ 1910.147(c) (1) Have you established an energy control program that consists of the following: energy control procedures, employee training, and periodic inspections?
- ☐ 1910.147(c)(4)(i) Have you developed and do you utilize procedures for the control of potentially hazardous energy when employees are engaged in the servicing and maintenance of machines and equipment?
- ☐ 1910.147 (c)(6)(i) Do you conduct a periodic inspection of your energy control procedure at least annually?
- ☐ 1910.147 (c)(7)(i) Do you provide training of the energy control program?
- ☐ 1910.147(c)(7)(i)(A) Have authorized employees received training in the recognition of hazardous energy sources, the type and magnitude of energy , and energy isolation and control?

Powered Industrial Trucks (29 CFR 1910.178)

- ☐ 1910.178(l)(1)(i) Have industrial truck operators completed training and evaluation to ensure their competency?
- ☐ 1910.178(l)(1)(ii) Do you require each operator of a powered industrial truck to successfully complete training prior to operation?
- ☐ 1910.178(l)(4)(iii) Do you evaluate the operator's performance at least once every three years?
- ☐ 1910.178(l)(6) Do you certify each operator has been trained and evaluated to operate powered industrial trucks? Does the certification include the operator's name, date of training, date of the evaluation, and the identity of the trainer?
- ☐ 1910.178(p)(1) If a powered industrial truck is in need of repair, defective, or unsafe, do you take the truck out of service until it is safe to operate?

Machine Guarding (29 CFR 1910.212)

- ☐ 1910.212(a)(1) Are point of operation, ingoing nip points, rotating parts, flying chips, and sparks guarded to protect the operator and other employees in the area?
- ☐ 1910.212(a)(2) Is the guard affixed to the machine or secured elsewhere, and have you ensured it does not create a hazard in itself?
- ☐ 1910.212(a)(3)(ii) Is the point of operation designed so as to prevent the operator from having any part of the body in the danger zone during the operating cycle?
- ☐ 1910.212(a)(5) Is the periphery of fan blades that are less than 7 feet above the floor or working level, guarded? Does the guard have openings no larger than one-half inch?
- ☐ 1910.212(b) Are machines designed for a fixed location securely anchored to prevent walking or moving?

Electrical-Wiring Methods (29 CFR 1910.305)

- ☐ 1910.305(b)(1)(i) Are conductors entering cutout boxes, cabinets or fittings protected from abrasion?
- ☐ 1910.305(b)(1)(ii) Are unused openings in cabinets, boxes, and fittings closed?
- ☐ 1910.305(b)(2)(i) Does each outlet box in the facility have a cover, faceplate, or fixture canopy?
- ☐ 1910.305(g)(1)(iv)(A) Are you avoiding using flexible cords and cables as a substitute for fixed wiring unless specifically permitted by the standard?
- ☐ 1910.305 (g)(2)(iii) Do you provide strain relief for flexible cords and cables when they are connected to devices and fittings?

Electrical-General Requirements

- ☐ 1910.303(b)(2) Is your electrical equipment installed and used according to instructions?
- ☐ 1910.303(f)(2) Is each service, feeder, and branch circuit legibly marked at its disconnecting means or overcurrent device to indicate its purpose?
- ☐ 1910.303(g)(1) Is there sufficient access and working space surrounding all electrical equipment?
- ☐ 1910.303(g)(1)(ii) Can you ensure working space around electrical equipment is not used for storage?
- ☐ 1910.303(g)(2)(i) Are live parts of electrical equipment, operating at 50 volts or more, guarded against accidental contact?

RESULTS ARE IN... NOW WHAT?

When you compare your citations to the Top 10 list, you may not be able to answer yes to each question. If you consistently answered no, consider this an opportunity for continuous improvement in developing your safety process. Keep in mind, OSHA has more than 100 General Industry Standards, and as a new plant safety person you must become acquainted with the standards that apply to your particular type of industry.

One of your best resources to learn more will be the OSHA website, where you can find all the OSHA standards, fact sheets, and training requirements together in one place. You can also reach out for help from experts like Antea Group, who specialize in knowing and understanding all the standards that apply to your business. If you have questions about particular standards and your specific organization, contact us using the information on the last page.



Personal Protective Equipment: A Primer

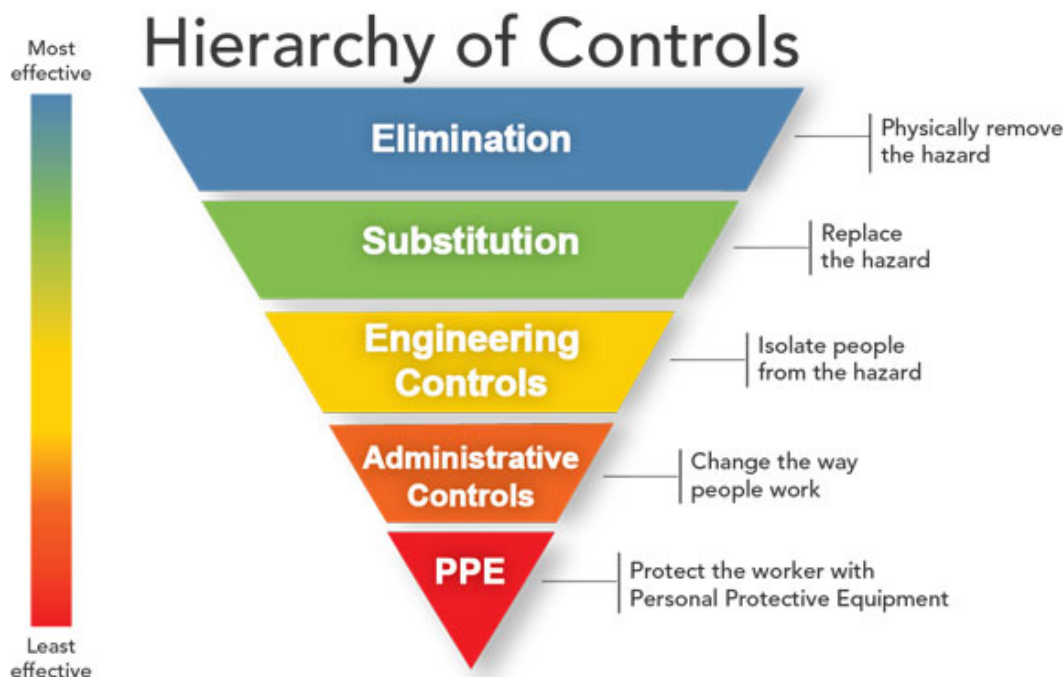
When you became the new plant safety manager, you set a personal goal to walk the plant production floor on a regular basis. Your goal was to get to know associates and supervisors, observe employees at work in order to understand the production process, and look for unsafe acts and conditions--it seemed as if you discovered something new each time you walked the production floor.

On your walk you noticed several associates performing a trimming operation without eye protection. You brought this to the attention of the department supervisor and asked why associates were being allowed to do this job without eye protection, when it was obvious that particles generated while performing the task could cause an injury. The supervisor replied, "This is the way we've always done it--eye protection has never been required."

As you returned to your office, the supervisor's words that eye protection had never been required echoed through your mind. You decided today was the day to review the OSHA standards on Personal Protective Equipment (PPE), understand the requirements, and determine whether your plant measures up.

PPE IS NOT THE BEST WAY TO CONTROL HAZARDS

Perhaps the most important thing to keep in mind is that PPE devices on their own should not be relied on to provide protection against hazards. Equipment design, manufacturing work practices, and engineering controls should be used to eliminate employee exposure or potential exposure prior to considering PPE. When evaluating the hazards, it can be helpful to consider the NIOSH (The National Institute for Occupational Safety and Health) Hierarchy of Controls shown on the following page. Note that PPE is considered the last line of defense.



SO WHAT DOES COMPLIANCE WITH THE STANDARDS LOOK LIKE?

The OSHA PPE standards have some very specific requirements, several of which are often overlooked or misunderstood by EHS managers. Let's take a closer look at four significant requirements, including what the standards actually require and what you as the new plant safety manager need to know to be compliant.

Hazard Assessment- 29 CFR 1910.132(d)(1) A hazard assessment is not simply a walkthrough of the work area to point out to the supervisor what you believe is the proper type of protective equipment. Rather, OSHA requires that the employer assess the workplace to determine if hazards are present, or are likely to be present, which necessitate the use of PPE. After the hazard assessment, the employer must select the types of PPE that will protect the employee from the hazards identified in the assessment.

OSHA also requires the employer to provide PPE that properly fits each affected employee. You must ensure you have multiple sizes of gloves, safety glasses, etc., that securely fit everyone. Once the assessment is completed and the equipment is identified, it is the employer's obligation to communicate to the employee the type of equipment selected. Most importantly, the employer must require the employee to use the equipment and the employee must cooperate by wearing the PPE.

Certification of Hazard Assessment- 29 CFR 1910.132(d) It is not enough to perform the Hazard Assessment and consider the job complete! OSHA requires that you have on file a written certification that a hazard assessment has been conducted. There are four specific items that this documentation must include: the workplace evaluated, the person certifying that the evaluation has been performed, the date(s) of the hazard assessment, and a statement that identified the document as a certification of hazard assessment.

Many safety people are not aware that OSHA allows employers to rely on previously conducted, appropriate hazard assessments even if performed by a previous employer for that facility, provided that the job conditions and hazards have not substantially changed. Keep in mind, if an employer relies upon a hazard assessment that another employer conducted, the certification must contain the date the current employer determined that the prior hazard assessment was adequate rather than the date of the former employer's assessment.

Written Certification for Training-29 CFR 1910.132(f)(4) Oftentimes safety training required by OSHA standards is grouped together with other OSHA training. (For instance, hazard communication training may be grouped with PPE and control of hazardous energy.) However, if PPE training is grouped with other training, each employee must be trained to know at least:

- when PPE is necessary;
- what PPE is necessary;
- how to properly don, doff, adjust, and wear PPE;
- the limitations of the PPE;
- and the proper care, maintenance, useful life and disposal of the PPE.

Once training is completed, the employer must have on file a written certification that each affected employee has received and understands the required PPE training. The PPE certification required by OSHA must contain the name of each employee trained, the dates of training, and the subject of the certification. (OSHA does not specify a certain format for the certification document.) It may be a single certification for all of its employees, for a group of employees (based on a common task, type of exposure, or other appropriate characteristic), or for one or more named employees. The document need only indicate that it is a certification of training for PPE.

Keep in mind that OSHA requires all affected employees to demonstrate an understanding of their training and the ability to properly use PPE before being allowed to perform work requiring the use of PPE.

WHO PAYS FOR PPE?

The question of who pays for PPE quite frequently arises and can often be confusing. With few exceptions, OSHA requires **employers** to pay for PPE used to comply with OSHA standards. The standards makes clear that employers cannot require workers to provide their own PPE. When a worker chooses to provide his or her own PPE because of style preferences, as with safety glasses or safety shoes, the employer must still ensure the equipment is adequate to protect the worker from hazards in the workplace.

At times, employees may request PPE that exceeds the PPE requirements. An employer does not have an obligation to pay for PPE requested by an employee that exceeds the PPE requirements (more stylish safety glasses or different styles of safety shoes), provided that the employer provides PPE that meets the standards at no cost to the employee. The OSHA standards specifically state an employer may require PPE that is provided at no cost to the employee to remain at the worksite in lockers or other storage areas. Employers must provide replacement PPE at no cost to the employee except in cases where the employee has lost or intentionally damaged the PPE.

DO YOU HAVE WORK TO DO?

Can you answer “Yes” to all of the following? If not, then you have work to do to ensure compliance with OSHA’s PPE standards.



Have you performed an assessment of the workplace to determine if hazards are present, or are likely to be present, to necessitate the use of PPE?



Do you have a written certification that a hazard assessment has been conducted and is it on file? Does the written certification contain the required information discussed above?



Do you have a written certification that each affected employee has received and understands the required training and is it on file?



Do you provide PPE for your employees as stated here?

If not, it’s time to begin the task of working towards compliance by understanding the requirements listed above. Compliance with PPE standards can be a big task--remember you don’t have to go it alone. Bring together the department supervisors and others that you have become acquainted with during your plant walkthrough and have them assist in performing the Hazard Assessment. If you still need help, don’t be afraid to engage an outside consultant with more expertise and an outside perspective.

Congratulations!

You've successfully navigated your first few months as a plant safety manager. You've walked through plant safety expectations, OSHA procedures, and Personal Protective Equipment standards. With these new Health & Safety tools, you are now prepared for many possible safety situations and are well on your way to becoming the well-informed, knowledgeable safety person you are meant to be!

If you have remaining questions or concerns, contact the EHS experts at Antea Group to discuss how they can support your efforts.

About Antea Group

Antea Group is an international engineering and environmental consulting firm. With access to more than 3,500 employees in over 75 offices and experience on 6 continents, we serve clients ranging from global energy companies and manufacturers to national governments and local municipalities.

Antea Group includes the Belgian, Dutch, French and United States engineering and consultancy operations of Oranjewoud N.V.

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