

# OSHA 101: Hazard Recognition & Regulations

July 2022

Presented by:  
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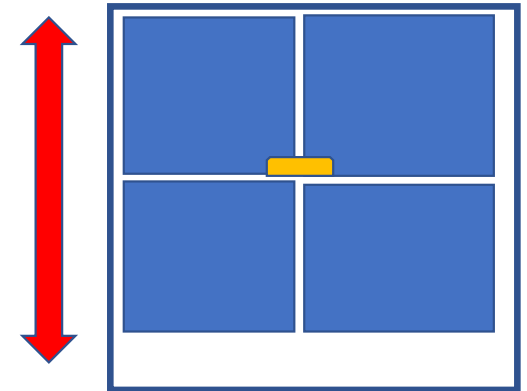
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## Decisions Require Trade-offs

Know where your RISK WINDOW is... how open is it?

- We Are In Control, By The Decisions We Make
- Decisions Require Trade-offs
- Do You Know What You Are About To Trade-off?
- **Make An Informed Decision, Minimize The Risk**





What we will cover:

1. OSHA Top Ten Violations
2. Basic Health & Safety Programs
3. Supervisor Management and Employee Onboarding
4. Employee Orientation to Compliance
5. Recap and Questions



# OSHA Top Ten Violations



# Why is OSHA Important to You?

- 5,333 workers were killed on the job in 2019 (3.5 per 100,000 full-time equivalent workers)
- An average of nearly 15 workers die every day
- About 20% (1,061) of worker fatalities in private industry in calendar year 2019 were in construction – accounting for one in five worker deaths for the year.

## OSHA Makes a Difference

- Worker deaths in America are down—on average, from about 38 worker deaths a day in 1970 to 15 a day in 2019.
- Worker injuries and illnesses are down—from 10.9 incidents per 100 workers in 1972 to 2.8 per 100 in 2019.

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# What Are OSHA Standards?

## OSHA standards are:

- Rules that describe the methods employers must use to protect employees from hazards
- Designed to protect workers from a wide range of hazards

Where there are no specific standards, employers must comply with the General Duty Clause of the OSH Act.

## Four Groups of OSHA Standards

**General Industry\***

**Construction**

**Maritime**

**Agriculture**

*\*General Industry is the set that applies to the largest number of workers and worksites*



- **OSHA Standard May be Administrative (AWAIR, 300 logs)**
- **OSHA Standard Industry/Task Specific (1910, 1926 Others)**
- **OSHA Standard May be Lateral**
  - **Right to Know (some are state specific as in MN)**
  - **Hearing Conservation-Noise**
  - **Respiratory Protection (Voluntary and Mandatory)**
  - **PPE**
- **OSHA Standard May be Chemical Specific**
  - **Lead**
  - **Respirable Crystalline Silica**
  - **Benzene**
  - **Methylene Chloride**
- **Best Industry Practice (Above OSHA Minimum)**

# Most Frequently Cited OSHA Standards

## OSHA's 2021 Top 10 Most Frequently Cited Violations





# OSHA Top Ten 2021

## **OSHA's Top 10 Most Frequently Cited Standards:**

- 1. Fall Protection, general requirements (29 CFR 1926.501)**
- 2. Respiratory Protection, General Industry (29 CFR 1910.134)  
Construction use the same std.**
- 3. Ladders, Construction (29 CFR 1926.1053)**





## **OSHA's Top 10 Most Frequently Cited Standards cont.**

**4. Scaffolding, general requirements, Construction (29 CFR 1926.451)**

**5. Hazard Communication Standard, general requirements (29 CFR 1910.1200)-this is a lateral standard for all industries**

**6. Control of Hazardous Energy (Lockout/Tagout), general requirements (29 CFR 1910.147)-If you have manufacturing, equipment repair, or even just a workshop, maintenance area this is for you**

**7. Fall Protection - Training Requirements (29 CFR 1926.503)**





## **OSHA's Top 10 Most Frequently Cited Standards cont.**

**8. Eye and Face Protection (29 CFR 1926.102) –General Industry If you have a production area, maintenance workshop its 1910.132-137**

**9. Powered Industrial Trucks, general requirements (29 CFR 1910.178)**

**10. Machinery and Machine Guarding, general requirements (29 CFR 1910.212)-Again if you have manufacturing, packaging machines, maintenance workshop, etc. this would apply to you**





## Facility Hazard Specific Checklist

- If I was to Start with the OSHA Top Ten Citations, How Many Would be in My Checklist??
- What are the Other Subparts that Might Come Into Play (1910 and 1926 Depending upon the Task)?
- Is OSHA the Only Loss Control Area to be Concerned About?
- OSHA Standards are *Minimum Standards*





## OSHA Standards (*cont.*)

### **These standards also:**

- Limit the amount of hazardous chemicals, substances, or noise that workers can be exposed to
- Require the use of certain safe work practices and equipment
- Require employers to monitor certain hazards and keep records of workplace injuries and illnesses

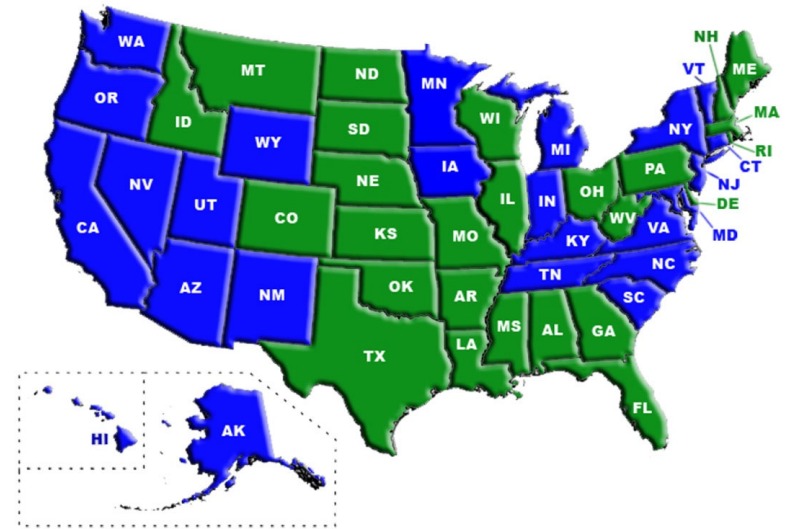


# Basic Health & Safety Programs



## Federal and State OSHA

- Occupational Health and Safety: History
- History of Safety Movement
- Federal and State Legislation
  - Federal OSHA
    - Administration
    - Major Provisions of the OSHA Act
    - Federal Register and Code of Federal Regulations
  - Federal MSHA (only as relevant)
  - State OSHA (only as relevant)
    - Administration
    - Major Provisions
- What to expect during enforcement inspections (citations, abatements, etc.)





## State vs Federal Programs

**State Plans are OSHA-approved workplace safety and health programs operated by individual states or U.S. territories. There are currently 22 State Plans covering both private sector and state and local government workers, and there are six (6) State Plans covering only state and local government workers.**

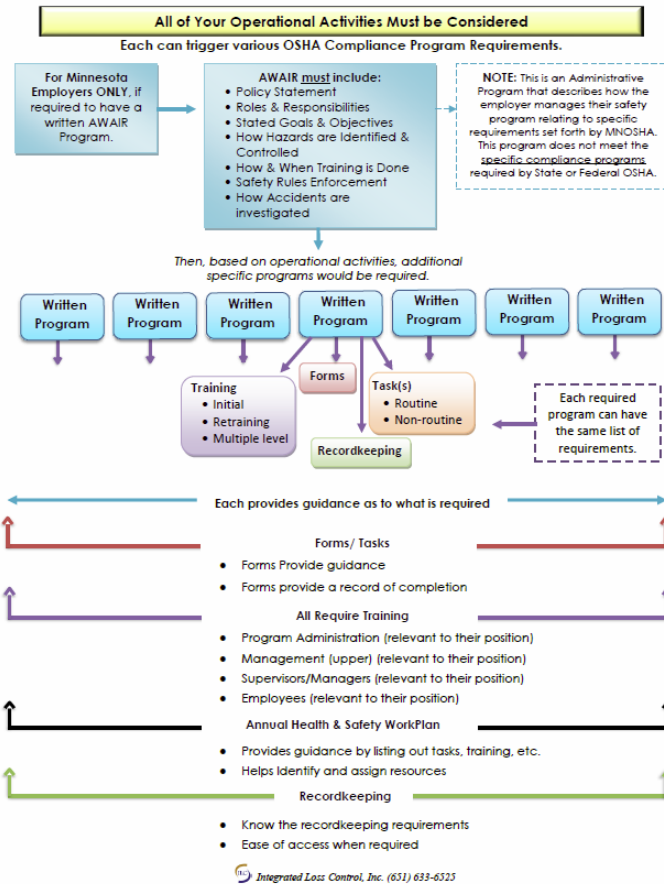


## Compliance Programs

- Determine which OSHA program(s) apply
- Recognize, Evaluate & Develop



## Health & Safety Program Requirement Overview





**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Each Program provides guidance as to what is required**





**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Forms/Tasks**

- **Forms Provide Guidance**
  - **Forms Provide A Record of Completion**
- 

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

### **All Require Training**

- **Program Administration (relevant to their position)**
- **Management(relevant to their position)**
- **Supervisors/Manager(relevant to their position)**
- **Employees(relevant to their position)**





**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

**Written  
Program**

### **Annual Health and Safety Workplan**

- **Provides Guidance by Listing out tasks, training, etc.**
  - **Helps Identify and assign resources**
- 

**Written  
Program**

**Written  
Program**

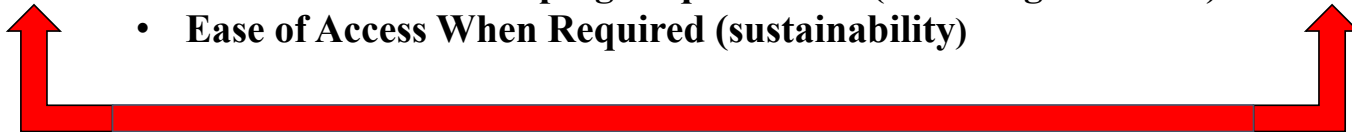
**Written  
Program**

**Written  
Program**

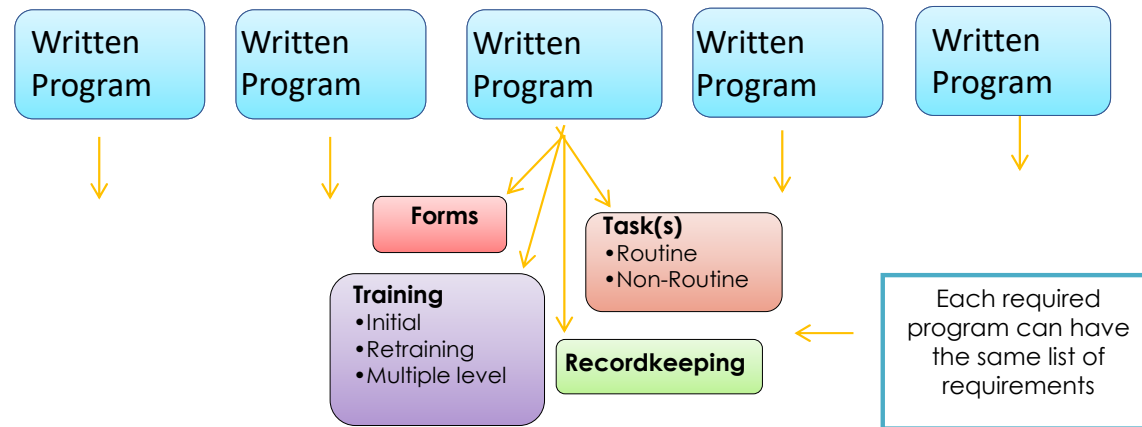
**Written  
Program**

## **Recordkeeping**

- **Know the Recordkeeping Requirements (including retention)**
- **Ease of Access When Required (sustainability)**



**Each can trigger various OSHA Compliance Program Requirements.**





## **AWAIR Requirements:**

Clearly stated goals and objectives.

Program must be written and describe:

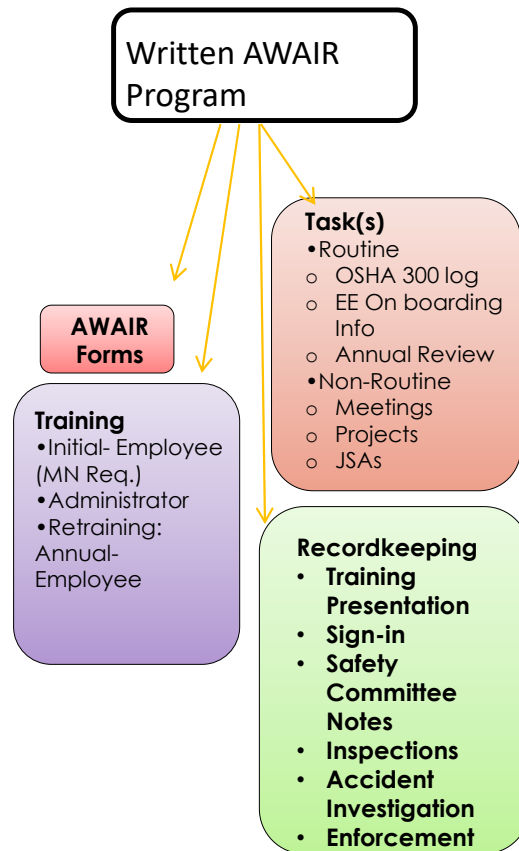
- Responsibilities of all employees.
- Methods used to identify and control hazards.
- How the program will be communicated to employees.
  - Training Methods (e.g. on boarding, annual)
- Accident investigations and corrective action.
- Enforcement of safe work practices and rules.

Policy Statement and includes Annual, documented review of program and goals.

Employees Need to Know Where to See a Copy.



## Written AWAIR Program



**Note:** AWAIR is and Administrative Program that describes how the employer manages their safety program relating to specific requirement set by MNOSHA. The AWAIR program does not meet the specific compliance programs required by State or Federal OSHA

## **Bloodborne Pathogens (1910.1030)**

Background and intent of the standard

Application of the standard

Major requirements of the standard

Common mistakes and citations

Recordkeeping

Training



## Other Biological Agents (as Part of MN OSHA Right to Know)

Background and intent of 5206.0700

Subpart 4

Application of the standard (MN Administrative Rule)

Major requirements of the standard

Common mistakes and citations


Recordkeeping

Training



Note: the bioagents list is updated every 2-3 years; SARS CoV2 is on this list, so are some vector-borne diseases





## **Right to Know (MN OSHA 3 Agent groups, Federal Chemical Agents only)**

- Background and intent of the standard
- Application of the standard (Again MN is Different than Federal)
- Major requirements of the standard
- Common mistakes and citations
- Recordkeeping
- Training

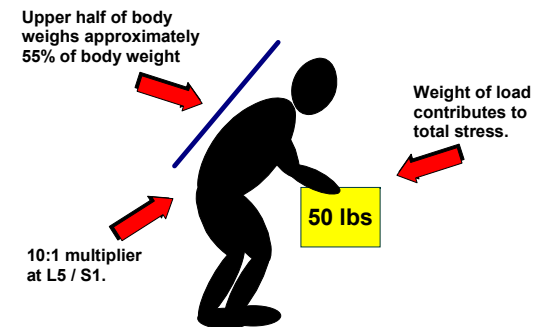
## Emergency Procedures

- Background and intent of the standard
- Application of the standard
- Major requirements of the standard
- Common mistakes and citations
- Recordkeeping
- Training



## Ergonomics

- Background and intent of the best practices (e.g. former standard)
- Application of the practices
- Major requirements of the best practices
- Common mistakes
- Recordkeeping
- Training



## Safety Committee

- Background and intent of the standard
- Application of the standard
- Major requirements of the standard
- Common mistakes and citations
- Recordkeeping
- Training



## Accident/Incident Investigation

- Background and intent of the program
- Application of the program
- Recordkeeping
- Training



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## Workers' Compensation

- Brief History
- Objectives
- How the premium (cost) is determined
  - Experience Modification
- How a sound Loss Control Program reduces costs
- Review current Insurance Company procedures
- Training and Awareness (Management, Supervisor, Employee)



- 
- ✓ **Recordkeeping**
  - ✓ **Information Use**
  - ✓ **Resources**



## Recordkeeping

- Background and intent of the standards
- Application of the standards
- Major requirements of the standards
- Common mistakes and citations
- Recordkeeping
- Training



## Recordkeeping

- Accident (Incident) Records
  - What needs to be recorded
  - How can the reports be used
  - Basic Systems
- OSHA Requirements and BSR Z16.5-Standard for Safety and Health incidents Guidelines
  - Work-related Cases
  - Recordability
  - Classification (injury or illness)
  - Incidence Rates
- Monitoring change in Records
- Record Retention
- Recordkeeping and Rates Including BSR Z16.5
  - Formulas and Calculation of Employee Hours
  - Disabling Injuries
  - Special Cases
  - Submitting info to Federal OSHA (ITA requirements for 300A)



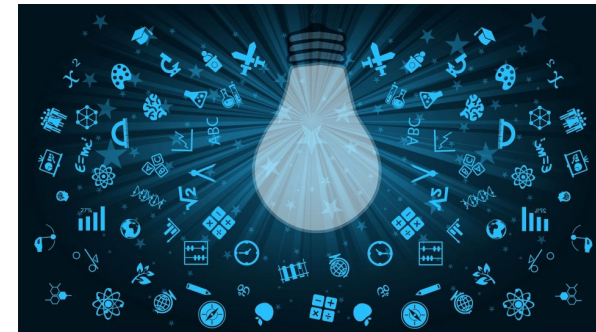
## Information Use

- Coordinate with:
  - Human Resources
  - Environmental Compliance
  - Workers Compensation
  - Fleet Safety
  - Other Loss Control Programs

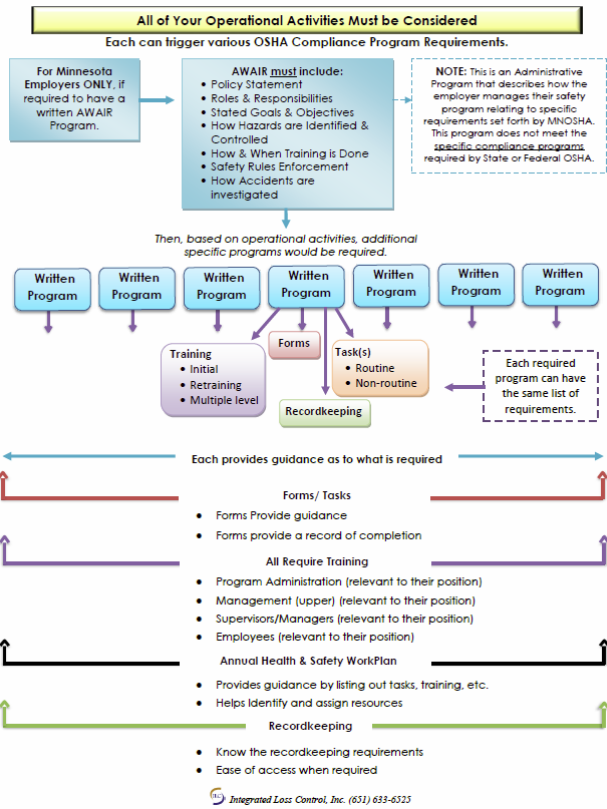


## Resources for Help

- Service Organization
- Standards and Specifications Groups
- Fire Protection Organizations
- Insurance Associations
- Internet
- Professional Societies
  - Trade Associations
  - Emergency & Specialized Information
  - U.S. Government Agencies
  - Educational Institutions
  - Safety and Health Related Periodicals



## Health & Safety Program Requirement Overview



Each provides guidance as to what is required

↑
↓

Forms/ Tasks

- Forms Provide guidance
- Forms provide a record of completion

↑
↓

All Require Training

- Program Administration (relevant to their position)
- Management (upper) (relevant to their position)
- Supervisors/Managers (relevant to their position)
- Employees (relevant to their position)

↑
↓

Annual Health & Safety WorkPlan

- Provides guidance by listing out tasks, training, etc.
- Helps Identify and assign resources

↑
↓

Recordkeeping

- Know the recordkeeping requirements
- Ease of access when required



## Establish **Annual Workplans** for Each Critical Program

If you can't put it in writing, what makes you think you can do it?

- Sets and controls expectations
- Identifies interested parties
- Establishes specific goals
- Presents routine and non-routine activities
- Identifies and assigns appropriate resources (coordinates)
- Updated as necessary to reflect required adjustments
- Maintained by one individual or multiple as established
- Provides continuity throughout changing people and times
- It is the rudder on Program for the ship (a weak one is like a canoe paddle for an oil tanker)



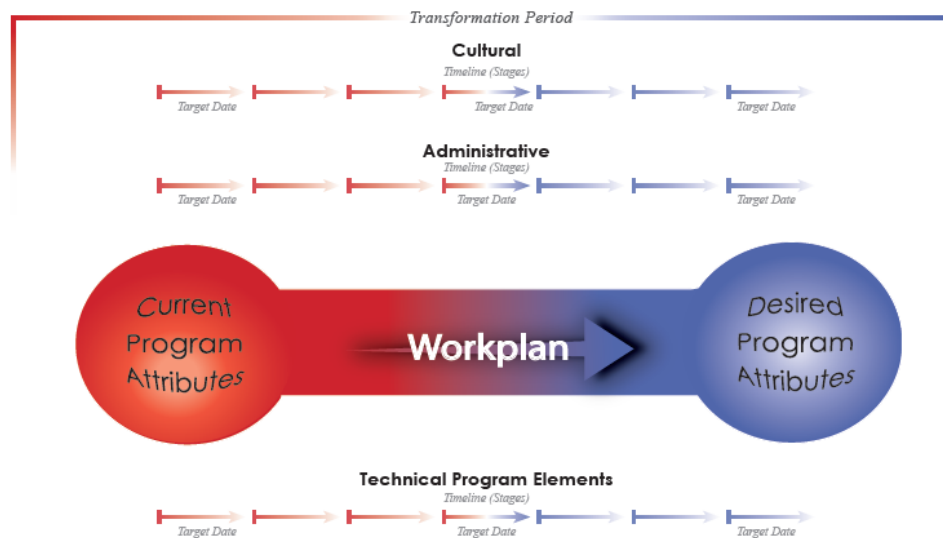


## **Subjects to Consider for Your Program Development Plan:**

- What Are Your Operations (core product, service)??
- OSHA elements (AWAIR, specific standards)
- Review Loss History (problem areas)
- Review Where You Have Been, Where Do You Want to Go???
- Employee, Work-team Input
- Trade Association, Work Groups, Networking
- Review Competitor's Plans (those running a successful organization)



## Loss Control Program Strategic Plan



Once recommendations (goals) have been identified by management, the Strategic Plan can be formulated. There will be goals that are administrative in nature and those which are technical or programmatic in nature. The above graphic depicts the *Cultural and Administrative* tracks and the *Technical* track. The Plan Development and Implementation Team Members will be determined by the track. All tracks can be underway simultaneously, but the target dates and the rate of progression may be faster for the Technical track, than the Cultural or Administrative tracks.

# Supervisor Management and Employee Onboarding





# Supervisor Management





# Management Responsibilities

- “How Managers, Supervisors and Employees are responsible for implementing the program and how continued participation of management will be established, measured and maintained.”
- General responsibilities of Management, Supervisors and employees.
- Suggestions:
  - Visible management support: financial and otherwise.
  - Supervisors enforce rules, facilitate work, coordinate.
  - Employees participate in program and follow rules.





## Management Training

To be successful, everyone must be on the same page.  
It begins and stops with management.

- Orientation to Program Initiatives (buy in from all levels)
- Program Administrator / Coordinator
- Roles and Responsibilities (existing and newly established)
- Give People The Tools To Succeed
- New People, Existing People But Different Role Now
- Hold People Accountable (its job performance)
- Remember to Sustain the Training Over Time





## **Beware of Training Materials Supported by Generic Compliance Programs**

- Do They Apply to Your Operations?
- Was the Training Complete?
- Was the Training Documented?
- How Does it Compare to the OSHA Standard, Best Practices?





## Taking Credit for Prior Activities.....

- What Does the Document Trail Look Like?
- Keep Relevant Source Documents, Training Aids, etc.

## Moving from Failure to Success

- Draw a New Line in the Sand to Move Forward





## The Good Faith Effort...

- Does it Meet Compliance?
  - *Again Look at the Standard*
- Who Was Involved?
- What Was Done?
- Records Available?





## Sustainability is Key

- Your Operations May Change
- The Regulations/Best Practices Change
- Team Members and Roles May Change
- Employees May Not Be Available (vacation, illness)

What do you have in place to ensure **sustainability**?





# Supervisor Management Onboarding



# Safety Program Overview

- Safety is the first consideration in the operation of our organization.
- Accidents are costly to the organization and the worker, and their family.
- Everything within reason will be done to maintain a safe and healthy workplace.
- Management has established responsibilities for all employees.
- Each employee is expected to fulfill those responsibilities.



# “Rules and tips”

- No such thing as total compliance with all regulations.
  - *It can't be done, it's not even a good goal.*
- Focus on hazards, not regulations.
  - Likely to cause injury/illness,
  - Likely to be cited by OSHA, or
  - Likely to be a concern for insurance carrier.
- Don't nitpick.
- It's not a contest.
  - The goal is not to find all violations.
  - Focus on 5-10 important ones.
- Leave personalities out of it.

# Employee Onboarding





# Safety Program Overview

## Intent of the Training Program

The purpose of training is to provide employees with the necessary summary safety related information to enable them to work safely at the onset of their employment with us. This information covers a number of subjects important for employees to know and understand.

More specific safety related information will need to be provided once employees begin work in the assigned department or area.



## Safety Program Overview

- Safety is the first consideration in the operation of our organization.
- Accidents are costly to the organization and the worker, and his/her family.
- Everything within reason will be done to maintain a safe and healthy workplace.
- Management has established responsibilities for all employees.
- Each employee is expected to fulfill those responsibilities.





# Hazard Recognition / OSHA Compliance

An On-going Review Looking Past The Obvious

## Safety Program Overview

### Your Rights(As An Employee)

- A workplace free of recognized, serious safety and health hazards.
- To know about the hazards of your work, how to protect yourself, and to the training you need to work safely.
- To see any medical or exposure record which applies to you.
- To see any record, written program, policy, or procedure which applies to you or your job.
- To have any safety-related question or concern adequately addressed.
- To not be discriminated against for reporting hazards or injuries

### Your Responsibilities(As an Employee)

- Behaving and working in the safest possible manner and following all established procedures and rules.
- Reporting all hazards, defective equipment, and unsafe conditions immediately.
- Attending and participating in all required training.
- Reporting all work-related injuries and illnesses immediately, regardless of severity.



# Hazard Identification and Control

- “The methods used to identify, analyze and control new or existing hazardous conditions or operations.”
- Suggestions:
  - Periodic inspections (in-house or outside resources).
  - Employee reports, suggestions.
  - Accident investigations.
  - Include “invisibles” (i.e. air, noise, ergonomics)
- Four types of controls (Eng., Substitution Admin., PPE.)
- Importance of Job Safety Analysis and process.
- Review Applicable OSHA Subparts



## “Am I liable if I miss something?”

- In general, No.
- You are not considered “experts” and there is no “duty” to find all violations/hazards. *Especially in a dynamic work environment*
- *The greater liability is:*
  - Not doing inspections, or
  - Doing inspections but not correcting issues.



# Safety Program Overview

## Training & Communication

- New employee training
- Regular ongoing safety training
- Specialized training
  - Supervisors
  - Safety committee members
  - Other employees
- Attendance and participation is mandatory
- Safety signs and postings

Note-You Need to Document Your Efforts to Demonstrate to Those Outside the Organization That This is Being Completed



# Safety Program Overview

## **Safety & Health Program** **(MN AWAIR-Administrative)**

Clearly stated goals and objectives.

Program must be written and describe:

- Responsibilities of all employees.
- Methods used to identify and control hazards.
- How the program will be communicated to employees.
- Accident investigations and corrective action.
- Enforcement of safe work practices and rules.

Annual, documented review of program and goals.



**Written Safety & Health Program is  
Electronic or Paper Copy?**



# Safety Program Overview

## Investigating Accidents

- Reported to the immediate supervisor
- Investigation *will always* be conducted
- Find facts, not fault
  - Cooperate with the investigation
  - People, Processes, Equipment
- Purpose is to Prevent Future Incidents/Accidents



# Safety Program Overview

## Safety Rules and Enforcement

- Safety training
- Employee handbook
- Posted in the facility
- **Safety is a part of your job, assigned duties**
- Disciplinary action, up to and including termination
- Not intended to be comprehensive
- Additional rules may apply
- Subject to change, with or without notice
- A partial list of key safety rules...

THINK SAFETY

### TEN RULES OF SAFETY

- Learn the safe way to perform a job before beginning
- Think safety and show it through your actions
- Comply with safety regulations and rules
- Use only equipment you are authorized to operate
- Wear appropriate clothing and protective equipment
- Act professionally at all times. No horseplay
- Examine equipment for safety prior to beginning work
- Report all injuries promptly to management
- Alert management to unsafe conditions or practices
- Assist in safety programs, be active

# Workers' Compensation

## Employee Responsibilities

- Report all injuries and illnesses
- “First Report of Injury”
- Cooperate by:
  - Designated health care providers (as applicable)
  - Keeping all medical appointments
  - Return to work program
  - Communicating and answering questions
- Failing to report incidents or follow proper procedure may jeopardize your benefits
- Medical bills and lost wages





# Employee Onboarding-What Do We Need to Cover for Health and Safety?



# Employee Onboarding

A full employee orientation must cover the following elements:

- Safety Program Overview
- Workers Compensation
- Personal Protective Equipment
- Hazard Communication-Right to Know
- Fire Prevention
- Emergency Action
- Lockout/Tagout (Affected Employees)
- Lockout Tagout-for the Authorized Employee
- Ergonomics-Office and or Production





# Employee Onboarding-How do We Track Participation?

Department	Name	Job Class Title	Hire Date	Required	Due Date
Example- Anehiem, CA	Example- John Doe	Driver	4/1/2017	Yes	4/1/2017

 **Back to Index**  
 **Training Records**

**New Employee On-Boarding Health & Safety**  
**Key:**  
 Color coded based on date shown on your device  
 (1) Initial  
 (2) Annual  
 (3) Multiple levels of training may be needed  
 (4) Level of training is based on compliance requirements  
 (5) Recommended

- PAST DUE
- Due in 0-7 days
- Due in 8-14 days
- Due in 15-21 days
- Due in 22-30 days
- Due in 31-60 days
- Due in 61 days +

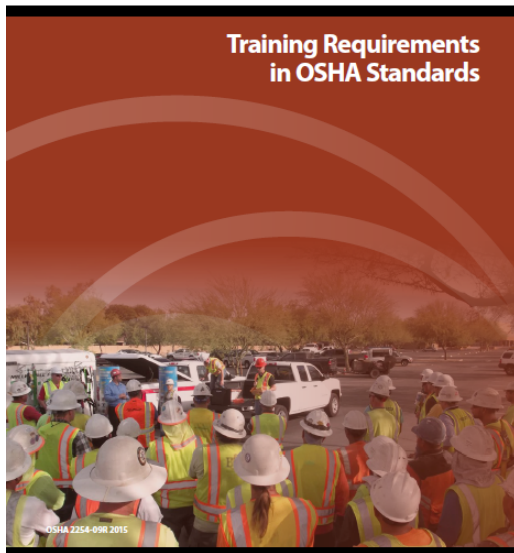
Received New Employee Orientation

A full orientation *MUST* cover the following topics:  
 Safety Program Overview  
 Workers Comp  
 PPE  
 Haz Com RTK  
 Fire Prevention  
 Emergency Action  
 LOTO  
 Ergonomics

Limitations: Based on information provided, this list of training topics covers the major OSHA and, if listed, other selected compliance training requirements. It does not, and cannot identify all the specific training that may be required due to the nature of a specific job/task, equipment, process or procedure followed, etc. Training requirements beyond those listed on this matrix are the sole responsibility of the employer.



# Employee Orientation to Compliance



OSHA Publication-270  
pages (a Summary)





# **Employee Orientation to Compliance-By the Time Are Done Training, No Work Gets Done-or The Employee Leaves**

*A Huge Challenge-Can It be Completed??*



# Recap and Questions



- 
- **OSHA Top Ten Violations (based on Sub-Parts and specific regulations)**
  - **Basic Health and Safety Programs**
  - **Supervisor Management and Employee Onboarding**
  - **Employee Orientation to Compliance**

**Thank You**





# North Risk Partners Value-Added Services Hotline

**(888) 667-4135**

Call the hotline to get personalized advice from HR and safety professionals on a variety of topics, including state and federal compliance, employer best practices, workplace programs and more.

\*You may also reach Integrated Loss Control by emailing [safety@northriskpartners.com](mailto:safety@northriskpartners.com)

