

Worker Safety (OSHA) Compliance Services

The mission of IPC's Worker Safety Department is to manage the safety and health of our client's employees by developing and implementing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. To accomplish our worker safety mission, IPC will manage your company's responsibilities to the following regulations:

1. A Workplace Accident & Injury Reduction Program (AWAIR)

On Jan. 1, 1991, Minnesota adopted an amendment to Minnesota OSHA Statutes (MN Statute, Sect. 182.653) that requires many employers to develop and use a formal workplace accident and injury reduction program. Employers engaged in certain specific standard industrial classification ([SIC](#)) codes are required by this legislation to develop and implement a written safety and health program with specific actions designed to reduce the incidence of workplace accidents and injuries.

An employer covered by this section must establish a written AWAIR program that includes:

- a. How managers, supervisors and employees are responsible for implementing the program and how continued participation of management will be established, measured and maintained.
- b. Methods used to identify, analyze and control new or existing hazards, conditions and operations.
- c. How the plan will be communicated to all affected employees so they are informed of work-related hazards and controls.
- d. How workplace accidents will be investigated and corrective action implemented.
- e. How safe work practices and rules will be enforced.

2. Hazard Communication/Minnesota Right to Know Program

The Employee Right-to-Know Act was passed by the Minnesota Legislature in 1983, and is intended to ensure employees are aware of the dangers associated with [hazardous substances](#), harmful physical agents or infectious agents they may be exposed to in their workplaces. The Employee Right-to-Know Act applies to all employers in Minnesota, with the exception of federal agencies.

To comply with the Employee Right-to-Know (ERTK) standard, employers must identify the hazardous substances, harmful physical agents and infectious agents that are present in the workplace and provide information and training to employees who are "routinely exposed" to those substances or agents. A written ERTK program is required.

In brief, the Employee Right-to-Know written program must include:

- a. Inventory of hazardous substances and/or agents that exist in the workplace.
- b. Identification of employees who are routinely exposed to those substances or agents.
- c. A system for obtaining and maintaining written information on the substances and agents employees may be exposed to in the workplace.
- d. Methods for making ERTK information readily accessible to employees in their work areas.
- e. A plan for providing initial, pre-assignment and annual training of employees.
- f. Implementation and maintenance of a labeling system or other warning methods.

3. Personal Protective Equipment (PPE) Program

OSHA's primary PPE standards are in Title 29 of the Code of Federal Regulations (CFR), Part 1910 Subpart I. OSHA's general PPE requirements mandate that employers conduct a hazard assessment of their workplaces to determine what hazards are present that require the use of PPE, provide workers with appropriate PPE, and require them to use and maintain it in sanitary and reliable condition.

As an employer, you must assess your workplace to determine if hazards are present that require the use of PPE. If such hazards are present, you must select PPE and require employees to use it, communicate your PPE selection decisions to your employees, and select PPE that properly fits your workers. You must also train employees who are required to wear PPE on how do the following:

- a. Use PPE properly
- b. Be aware of when PPE is necessary
- c. Know what kind of PPE is necessary
- d. Understand the limitations of PPE in protecting employees from injury
- e. Don, adjust, wear, and doff PPE
- f. Maintain PPE properly

4. Accident/Illness Record Keeping

The purpose of this rule (29 CFR, Part 1904) is to require employers to record and report work related fatalities, injuries and illnesses. Recording or reporting a work-related injury, illness, or fatality does not mean that the employer or employee was at fault, that an OSHA rule has been violated, or that the employee is eligible for workers' compensation or other benefits.

If your company had ten (10) or fewer employees at all times during the last calendar year, you do not need to keep OSHA injury and illness records unless OSHA or the Bureau of Labor & statistics (BLS) informs you in writing that you must keep records under § 1904.41 or § 1904.42. However, as required by § 1904.39, all employers covered by the OSH Act must report to OSHA any workplace incident that results in a fatality or the hospitalization of three or more employees.

In brief, the Accident/Injury Record Keeping must include:

- a. Maintenance of OSHA 300 Log
- b. Completion/Posting the OSHA 300A Log Summary Annually
- c. OSHA Form 301 (Incident Report) documentation

5. Respiratory Protection Program

Under the Respiratory Protection standard (29 CFR 1910.34), OSHA may require you to establish a written respiratory protection program when exposure to an airborne contaminant or to low oxygen levels can cause illness or injury a worker's health, and when these health effects can be prevented by the appropriate selection and use of a respirator.

You are required to include the following elements (as applicable) in your respiratory protection program:

- a. Procedures for:
 - Selecting appropriate respirators for use in the workplace.
 - Fit testing tight-fitting respirators.
 - Using respirators properly in routine situations as well as in reasonably foreseeable emergencies.
 - Cleaning, disinfecting, storing, inspecting, repairing, removing from service or discarding, and otherwise maintaining respirators. Also, you must establish schedules for these elements.
 - Ensuring adequate air supply, quantity, and flow of breathing air for atmosphere supplying respirators.
 - Regularly evaluating the effectiveness of the program.
- b. Provisions for medical evaluation of employees who must use respirators.
- c. Training employees in the proper use of respirators (including putting them on and removing them), the limitations on their use, and their maintenance.
- d. You are required to ensure that all employees who use a respirator voluntarily are provided with certain basic information on proper use.

6. Hearing Conservation Program

Under the Hearing Conservation standard (29 CFR 1910.95), OSHA may require you to establish a written hearing conservation program. An effective hearing conservation program can prevent hearing loss, improve employee morale and a general feeling of well-being, increase quality of production, and reduce the incidence of stress-related disease.

Minimum requirements of a hearing conservation program are include:

- a. Monitoring Program
- b. Audiometric Testing Program (App IV:A)
- c. Hearing Protection Devices (HPDs)
- d. Employee Training and Education
- e. Recordkeeping

7. Lockout/ Tagout Program

The Lockout/Tagout standard (29 CFR 1910.147) requires the adoption and implementation of practices and procedures to shut down equipment, isolate it from its energy source(s), and prevent the release of potentially hazardous energy while maintenance and servicing activities are being performed. It contains minimum performance requirements, and definitive criteria for establishing an effective program for the control of hazardous energy.

The Lockout/Tagout written program has three core components: energy control procedures, employee training, and periodic inspections.

- a. Energy control procedures detail and document the specific information that an authorized employee must know to accomplish lockout/tagout, namely, the scope, purpose, authorization rules and techniques to be utilized for the control of hazardous energy.
- b. Periodic inspections of the energy control procedures ensure that the procedures and the requirements of the standard are being followed.
- c. Employee training and retraining, along with additional training under a tagout system, ensures that the purpose and function of the energy control programs are understood by the employer.

8. Blood Borne Pathogens Program

OSHA's Bloodborne Pathogens standard (29 CFR 1910.1030), details what employers must do to protect workers whose jobs put them at a reasonable risk of coming into contact with blood and other potentially infectious materials.

The standard requires employers to do the following:

- a. Establish an exposure control plan. This is a written plan to eliminate or minimize employee exposures.
- b. Use engineering controls. These are devices that isolate or remove the bloodborne pathogen hazard from the workplace.
- c. Enforce work practice controls. These are practices that reduce the likelihood of exposure by changing the way a task is performed.

- d. Provide personal protective equipment such as gloves, gowns, and masks. Provide information and training to employees. Employers must ensure that their workers receive regular training that covers the dangers of bloodborne pathogens, preventive practices, and post-exposure procedures.
- e. Maintain employee medical and training records.

9. Industrial Lift Trucks Training Program

Effective March 1, 1999, the Occupational Safety and Health Administration (OSHA) revised its previous requirements for powered industrial truck operator training (29 CFR 1910.178) and issued new requirements to improve the training of these operators. The requirements are intended to reduce the number of injuries and deaths that occur as a result of inadequate operator training.

In brief, the Industrial Lift Trucks written/Training program must include:

- a. Development of a Written Training Program
- b. Formal instruction (e.g., lecture, discussion, interactive computer learning)
- c. Practical training (demonstrations and exercises performed by the trainee)
- d. Evaluation of the operator's performance in the workplace
- e. Certification Documentation

10. Emergency Action Plan

An emergency action plan (EAP) is a written document required by particular OSHA standards (29 CFR 1910.038). The purpose of an EAP is to facilitate and organize employer and employee actions during workplace emergencies.

The elements of the plan must include, but are not limited to:

- a. Evacuation procedures and emergency escape route assignments.
- b. Procedures to be followed by employees who remain to operate critical plant operations before they evacuate.
- c. A procedure to account for all employees after an emergency evacuation has been completed.
- d. Rescue and medical duties for those employees who are to perform them.
- e. Means of reporting fires and other emergencies.
- f. Names or job titles of persons who can be contacted for further information or explanation of duties under the plan.

11. Confined Space Entry Program

OSHA's Confined Space Entry Program standard (29 CFR 1910.146), details what employers must do to protect workers whose jobs require them enter spaces with potential chemical and environmental hazards. The employer shall evaluate the workplace to determine if any such spaces are permit-required confined spaces. "Permit-required confined space program (permit space program)" means the employer's overall program for controlling, and, where appropriate, for protecting employees from, permit space hazards and for regulating employee entry into permit spaces.

Confined space entry regulations require employers to establish a Confined Space Entry program which contains the following elements:

- a. Identification of each permit entry confined space and informing workers by sign, placard, training program or other effective means of its location in order to prevent unauthorized entry.
- b. A specific training program for workers who would be entering such spaces before they may be authorized to enter them.
- c. Availability of all protective clothing and personal protective equipment necessary for safe entry into such places.
- d. Procedures to assure availability of rescue and safety related equipment or services.
- e. Procedures to make non-entry rescues possible where entry would be into an atmosphere immediately dangerous to life or health or into an area where there is a risk of engulfment.
- f. Methods for determining and evaluating the source of any atmospheric contamination found at the time of entry.
- g. Establishing an entry permit system which is covered in the section on ENTRY PERMIT SYSTEM.

12. Ergonomics

Ergonomics is the practice of designing equipment and work tasks to conform to the capability of the worker, it provides a means for adjusting the work environment and work practices to prevent injuries before they occur.

OSHA recommends that Employers with high incident levels of ergonomically related incidents implement an effective ergonomics process that:

- a. Provides Management Support
- b. Involves Employees
- c. Identifies Problems
- d. Implements Solutions
- e. Addresses Reports of Injuries
- f. Provides Training
- g. Evaluates Ergonomics Efforts