Introduction to OSHA for General Industry

Presented by:
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OSHA Consultation Program at CSU
Topics

- OSHA History
- OSHA Inspection Process and Procedures Overview
- Local Injury Statistics and Frequently Cited OSHA Violations
- Current Colorado Enforcement Initiatives
- OSHA Consultation Programs
- OSHA Compliance Assistance Resources
OSHA History

- Background
  - Need for Legislation
  - OSHA Act of 1970
  - OSHA’s Purpose
  - The Act’s Coverage
Need for Legislation

- In 1970, Congress considered these annual figures:
  - Job-related accidents accounted for more than 14,000 worker deaths
  - Nearly 2-1/2 million workers were disabled
  - Estimated new cases of occupational diseases totaled 300,000

Since OSHA’s establishment, worker fatalities have been cut by 60 percent, and injury and illness rates, by 40 percent.
OSH Act of 1970

PURPOSE:

"... to assure so far as possible every working man and woman in the Nation safe and healthful working conditions and to preserve our human resources."
The Act's Coverage

- Extends to all employers and their employees in the 50 states, District of Columbia, Puerto Rico, and all other territories under Federal Government jurisdiction.
- Coverage provided either directly by federal OSHA or through an OSHA-approved state program.
State and Local Governments

- OSHA provisions do not apply to state and local governments in their role as employers
- OSHA provisions do apply to federal agencies
General Duty Clause

- Each employer "shall furnish . . . a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."
OSHA INSPECTION PRIORITIES

- Imminent Danger
  - Any condition that can be expected to cause death or serious physical harm immediately

- Fatalities/Catastrophes
  - Catastrophe - Three or more employees hospitalized

- Employee Complaints

- Referrals
  - Other governmental agencies

- Programmed Inspections
COMPLAINT INSPECTION

Any employee or representative of employees who believe that a violation of the Act exists may request an OSHA inspection

1. Reduced to writing
2. Allege a hazard
3. Signed by the employee or representative
Anyone who believes that a violation of the Act exists may request a complaint investigation:

1. OSHA advises employer of alleged hazard by telephone and fax.
2. Employer is required to provide a satisfactory written response.
3. OSHA provides copies of employer response to complainant.
The Inspection Process

- Opening Conference
- Walkthrough
- Closing Conference
- Citations and Penalties
- Informal Conference
- Notice of Contest
Opening Conference

- Inspector explains the purpose and scope of the visit
- Inspector asks for an employer representative to accompany them during the inspection
- Request for records and programs
OSHA New Recordkeeping Rule

- New rule implemented on January 1, 2002
- Delayed effective date until Jan. 1, 2003 for Hearing loss criteria and MSDs
- Forms revised in October 2003:
  - New Forms required for recording 2004 injuries and illnesses
  - Hearing loss column added
  - “Days Away” column and “Job Transfer or Restriction” column interchanged
Recording Criteria Decision Tree

1. Did the employee experience an injury or illness?
   - NO
   - YES

2. Is the injury or illness a new case?
   - NO
   - YES

3. Is the injury or illness work-related?
   - NO
   - YES

4. Is the injury or illness a new case?
   - NO
   - YES

5. Does the injury or illness meet the general recording criteria or the application to specific cases?
   - NO
   - YES

6. Update the previously recorded injury or illness entry if necessary.

7. Do not record the injury or illness

8. Record the injury or illness

1904.4
Updates three recordkeeping forms

- OSHA Form 300 – Log of Work-Related Injuries and Illnesses
- OSHA Form 301 – Injury and Illness Incident Report
- OSHA Form 300A – Summary of Work-Related Injuries and Illnesses
OSHA's Form 300

Log of Work-Related Injuries and Illnesses

You must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. You must also record significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional. You must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.3 through 1904.10. Failure to use two lines for a single case if you need to. You must complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.

<table>
<thead>
<tr>
<th>Identify the person</th>
<th>Describe the case</th>
<th>Classify the case</th>
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<tbody>
<tr>
<td>(A) Case no.</td>
<td>(B) Employee's name</td>
<td>(C) Job title (e.g., welder)</td>
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Public reporting burden for this collection of information is estimated to average 1 hour 15 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about this estimate or any other aspect of this data collection, contact: U.S. Department of Labor, OSHA Office of Statistics, Room N-3614, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed form or data collection.

OSHA Form 300
### OSHA’s Form 300
#### Log of Work-Related Injuries and Illnesses

**Old (2003)**

- **Identify the person**
  - Case no.
  - Employer’s name
  - Date of injury or onset of illness

- **Describe the case**
  - Injury or illness, parts of body affected, and object/substance that directly injured or made person ill

**New (2004)**

- **Identify the person**
  - Case no.
  - Employee’s name
  - Date of injury or onset of illness

- **Describe the case**
  - Injury or illness, parts of body affected, and object/substance that directly injured or made person ill

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**Attention:** This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

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**Old (2003)**

- **Classify the case**
  - Using the four categories, check ONLY ONE box for each case.
  - Enter the number of days the injured or ill worker was.

**New (2004)**

- **Classify the case**
  - Using the four categories, check ONLY ONE box for each case.
  - Enter the number of days the injured or ill worker was.
OSHA's Form 301
Injury and Illness Incident Report

This Injury and Illness Incident Report is one of the first forms you must fill out when a recordable work-related injury or illness has occurred. Together with the Log of Work-Related Injuries and Illnesses and the accompanying Summary, these forms help the employer and OSHA develop a picture of the extent and severity of work-related incidents.

Within 7 calendar days after you receive information that a recordable work-related injury or illness has occurred, you must fill out this form or an equivalent. Some state workers’ compensation, insurance, or other reports may be acceptable substitutes. To be considered an equivalent form, any substitute must contain all the information asked for on this form.

According to Public Law 91-506 and 29 CFR 1904, OSHA’s recordkeeping rule, you must keep this form on file for 5 years following the year to which it pertains.

If you need additional copies of this form, you may photocopy and use as many as you need.

Information about the employee

1. Full name __________________________
2. Street ____________________________
3. City _____________________________ State ______ ZIP ______
4. Date of birth ______/____/____
5. District ______/____/____
6. Male ☐ Female ☐ Permit ☐

Information about the physician or other health care professional

7. Name of physician or other health care professional __________________________
8. If treatment was given away from the worksite, where was it given?
   Hospital ________________________________________________________________
   Street _________________________________________________________________
   City _____________________________ State ______ ZIP ______

Information about the case

9. Case number from the Log ____________________ (Transfer the case number from the Log after you entered the case.)
10. Date of illness or injury ______/____/____
11. Time employee began work ______/____/____ AM / PM
12. Time of event ______/____/____ AM / PM ☐ Check if time cannot be determined

13. What was the employee doing just before the incident occurred? Describe the activity, as well as the tools, equipment, or material the employee was using. Be specific. Examples: “climbing a ladder while carrying building materials”; “spraying chlorine from hand sprayer”; “daily computer key-entry.”

14. What happened? Tell us how the injury occurred. Examples: “When ladder slipped on wet floor, worker fell 20 feet”; “Worker was sprayed with chlorine when garden hose broke during replacement”; “Worker developed carcinoma in vitreous over time.”

15. What was the injury or illness? Tell us the part of the body that was affected and how it was affected. Be more specific than “burn,” “pain,” or “sore.” Examples: “chemical burn, hand”; “carpal tunnel syndrome.”

16. What object or substance directly harmed the employee? Examples: “concrete floor”; “chlorine”;
   “radiation” or “X-rays.” If this question does not apply to the incident, leave it blank.

17. If the employee died, when did death occur? Date of death ______/____/____
OSHA's Form 300A

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the totals from every page of the Log. If you had no cases, write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rules, for further details on the access provisions for these forms.

<table>
<thead>
<tr>
<th>Number of Cases</th>
<th>Total number of deaths</th>
<th>Total number of cases with days away from work</th>
<th>Total number of cases with job transfer or restriction</th>
<th>Total number of other recordable cases</th>
</tr>
</thead>
<tbody>
<tr>
<td>(5)</td>
<td>(6)</td>
<td>(7)</td>
<td>(8)</td>
<td>(9)</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Number of Days</th>
<th>Total number of days of job transfer or restriction</th>
<th>Total number of days away from work</th>
</tr>
</thead>
<tbody>
<tr>
<td>(10)</td>
<td>(11)</td>
<td>(12)</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Injury and Illness Types</th>
<th>Total number of...</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) Injuries</td>
<td>(M)</td>
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<tr>
<td>(2) Skin disorders</td>
<td></td>
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<tr>
<td>(3) Respiratory conditions</td>
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<tr>
<td>(4) Poisonings</td>
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<tr>
<td>(5) All other illnesses</td>
<td></td>
</tr>
</tbody>
</table>

Sign here

Knowingly falsifying this document may result in a fine.

I certify that I have examined this document and that to the best of my knowledge the entries are true, accurate, and complete.

Company: __________________________
Signature: ________________________
Date: ____________________________
OSHA Recordkeeping Presentations
(www.osha.gov)
Walkthrough

- Inspector proceeds through the worksite to identify safety and health hazards (inspection may cover part or all of the worksite)
- Inspector takes photos/videotapes
- Inspector talks privately with employees
- Inspector points out unsafe or unhealthful conditions and discusses feasible corrective action
Closing Conference

- Inspector reviews all observed unsafe and unhealthful conditions
- Inspector indicates violations for which a citation and penalty may be issued
- Good time for the employer to produce records of compliance efforts and provide information to help determine timeframes for abatement
Citations

- Employer will receive citations and notices by certified mail.
- Employer must post a copy of each citation at or near the place the violation occurred for 3 days or until it is abated.
Informal Conference

- Employer may request an informal conference with the Area Director
- Area Director is authorized to enter into settlement agreements
- Area Director may revise citations and penalties to avoid prolonged legal disputes for speedier hazard abatement
Notice of Contest

- Employer has 15 working days to contest the citation, penalty, or abatement period
- Must be in writing
- Hearing with OSHRC scheduled near the employer’s workplace
Questions about OSHA Procedures?
Regional and Colorado Enforcement Programs
Regional & Colorado General Industry Emphasis Programs

- Lead in Radiator Shops (Denver)
- Logging (Denver and Englewood)
- Silica in Stone Fabrication (Denver)
- Oil and Gas Well Servicing (Denver)
- Woodworking (Denver and Englewood)
- MDI in Sprayed-On Bedliners (Denver and Englewood)
- Warehousing (Region)
- Tree-Trimming (Region)
- Concrete Products (Region)
Other Inspection Programs

- Programmed
  - Site-Specific Targeting (SST)
  - Dodge List
- Unprogrammed
  - Complaint
  - Fatality
  - Referral
  - Imminent danger
National Enforcement Programs
New OSHA Strategic Management Plan: High Incident/High Severity industries

- Public warehousing and storage
- Oil and Gas field services
- Preserve fruits and vegetables
- Concrete and concrete products
- Blast furnace and basic steel products
- Ship & boat building and repair
- Landscaping/horticultural services
Site-Specific Targeting (SST)

Since 1995, OSHA has been collecting injury and illness recordkeeping data from various establishments.

Each year the SST plan is updated with the most current data.

Since 1998, OSHA has used the information from each data collection to identify approximately 13,000 establishments in Federal jurisdiction with high lost workday injury and illness case rates.

OSHA sends letters to these establishments indicating its concern about the high injury and illness rate at the establishment.

On February 11th, letters went out to employers with more than 40 employees who reported high LWDII rates for CY 2001. Inspections for the SST-03 program began in June of this year.
OSHA Consultation Programs

Colorado State University

Knowledge to Go Places
Consultation Programs in the 4 Corners

- ARIZONA
  Consultation & Training
  Industrial Commission of Arizona
  Division of Occupational Safety & Health
  800 West Washington Street
  Phoenix, Arizona 85007- 2922
  (602) 542-5795
  (602) 542-1614 FAX
  E-mail: pat.ryan@osha.gov
Consultation Programs in the 4 Corners

- **COLORADO**
  Colorado State University
  Occupational Safety and Health Section
  115 Environmental Health Building
  Fort Collins, Colorado 80523
  (970) 491-6151
  (970) 491-7778 FAX
  E-mail: del.sandfort@colostate.edu
  Website: http://www.bernardino.colostate.edu/public
Consultation Programs in the 4 Corners

- **NEW MEXICO**
  New Mexico Environment Department
  Occupational Health & Safety Bureau
  525 Camino DeLos Marquez, Suite 3
  PO Box 26110
  Santa Fe, New Mexico 87502
  (505) 827-4230
  (505) 827-4422 FAX
  E-mail: robert_genoway@nmenv.state.nm
  Website: [http://www.nmenv.state.nm.us/](http://www.nmenv.state.nm.us/)
Consultation Programs in the 4 Corners

UTAH
State of Utah Labor Commission
Workplace Safety & Health
Consultation Services
160 East 300 South
Salt Lake City, Utah 84114-6650
801-530-6901
(801) 530-6992 FAX
E-mail: Isilva@utah.gov
Website:
http://www.uosh.utah.gov/Consultation_Services/consultation_services.html
Onsite Consultation Programs

- Independent from OSHA Compliance
- No citations, fines or penalties
- Free to qualified employers
- Confidential
Consultation Provides

- Comprehensive Safety & Health Evaluations and Written Reports
- Recommendations for Hazard Abatement
- Industrial Hygiene Sampling
- Training and Follow-Up
- SHARP exemption program
“SHARP”

Safety
Health
Achievement
Recognition
Program
What is SHARP and Who Can Get It?

- Program from the Dept. of Labor to recognize achievements of safety and health excellence.
- SHARP means long-term prevention of work-related injuries and illnesses, and the potential for significant cost savings.
- SHARP guarantees an OSHA General Schedule Inspection Exemption.
- SHARP is only for small, high hazard workplaces with < 250 employees.
- SHARP is about Excellence & Good Business!
SHARP Requirements

- Undergo a comprehensive safety & health survey/evaluation.
- Correct all identified hazards.
- Commit in writing to work with CSU for a probationary period of up to 18 months.
- Maintain your injury and illness rates below the National average for your SIC.
- Establish and maintain an effective Safety and Health Program.
SHARP Benefits

- Formal recognition from the Assistant Secretary of Labor, OSHA and Colorado State University
- Removal from OSHA’s inspection schedule
- Lowered Injury & Illness rates
- Real Cost Savings:
  - Workers Comp Prems, Deductible Med Costs, Mod Rate
  - Qualification for State Cost Containment
- Continued priority for free services
- Improved communication, morale and productivity
- Positive image maker & marketing tool
Compliance Assistance Resources
Compliance Assistance Resources

- Compliance Assistance Specialists
- OSHA’s Website
  - Technical Links
  - E-Tools
- Compliance Assistance CD
- Compliance Assistance Network
  - Quarterly Newsletter
Compliance Assistance Specialist (CAS)

- Provides compliance advice and assistance to businesses (especially small businesses), labor affiliates and other stakeholders within the Area Office jurisdiction.

- **100%, full-time compliance assistance**
Colorado Compliance Assistance Specialists

Megan Meagher
Denver Area Office
303-844-5285 x105

George Flynn
Englewood Area Office
303-843-4500 x132
Outreach and Assistance
Products, Tools and Services

- 561 million hits on the website
- New eTools
- 10,000 e-mail queries
- 140,000 calls on toll-free line
- Nearly 30,000 subscribers to QuickTakes
eTools

What are "eTools"?

- "Stand-alone," interactive, Web-based training tools on occupational safety and health topics
- Describe potential hazards and possible solutions to safety and health hazards
- Highly illustrated with images and animations
- Utilize graphical menus
- Selected eTools utilize additional features such as
  - Expert System modules that enable the user to answer questions and receive reliable advice on how OSHA regulations apply to their work site
  - Interactive quizzes
  - Animations

Where are eTools located?

First, go to the OSHA home page (http://www.osha.gov) and click on the eTools link in the blue bar at the right.
OSHA eTools - Examples

eTools
- Construction
- NEW Evacuation Plans and Procedures (Beta)
- Eye and Face Protection (Beta)
- Hospital (Beta)
- Lockout/Tagout
- Logging
- NEW Machine Guarding (Beta)
- Nursing Home
- Poultry Processing
- Respiratory Protection
- Safety and Health Management
- NEW Scaffolding I and II (Beta)
- Shipyard Employment I and II
- NEW Shipyard Employment III, IV and V (Beta)
- Silica
- NEW Steel Erection (Beta)
- Wood Products: Sawmills (Beta)
- Wood Products: Woodworking (Beta)

Ergonomics eTools
- Baggage Handling
- Beverage Delivery
- Computer Workstations I
- Grocery Warehousing
- Sewing

eTools en Español
- El Manejo del Equipaje (Baggage Handling)
- La Costura (Sewing)
- Vease también OSHA en Español

Expert Advisors
- Asbestos
- Confined Space
- Confined Space, Permit Required (e-PRCS)
- Fire Safety
- Hazard Awareness
- Lead in Construction
- Lead in General Industry
- Lockout/Tagout
- SafeCare
- Safety Pays
Log Handling, Sorting and Storing
Log Breakdown, related Machinery and Facilities
Dry Kilns and Facilities
Lumber Storage
Plant-Wide Hazards
E-Tips: Who must keep records of work-related injuries and illnesses? Employers with 11 or more employees must keep such records. Certain workplaces in low hazard industries such as retail, service, finance, insurance and real estate are exempt from OSHA's recordkeeping requirements. More E-Tips>>
Quick Start

U.S. Department of Labor
Occupational Safety & Health Administration

www.osha.gov

General Industry Quick Start »  Step 1  Step 2  Step 3  Step 4  Step 5  Step 6  Library

Step 2: OSHA Requirements That Apply to Most General Industry Employers

The following are selected OSHA requirements that apply to many general industry employers.

1. **Hazard Communication Standard.** This standard is designed to ensure that employers and employees know about hazardous chemicals in the workplace and how to protect themselves. Employers with employees who may be exposed to hazardous chemicals in the workplace must prepare and implement a written Hazard Communication Program and comply with other requirements of the standard.
   - Read a fact sheet. OSHA Fact Sheet: Hazard Communication Standard
   - See a sample program. OSHA Publication: Model Plans and Programs for the OSHA Bloodborne Pathogens and Hazard Communications Standards [PDF]
   - Learn more. OSHA Safety and Health Topics Page: Hazard Communication

2. **Emergency Action Plan Standard.** OSHA recommends that all employers have an Emergency Action Plan. A plan is mandatory when required by an OSHA standard. An Emergency Action Plan describes the actions employees should take to ensure their safety in a fire or other emergency situation.
   - Does this apply to me? OSHA eTool: Evacuation Plan and Procedures
   - See a sample program. Sample Emergency Action and Fire Prevention Plan, Illinois Consultation Program [PDF]
   - Create your own plan. OSHA eTool: Evacuation Plan and Procedures
   - Learn more. OSHA eTool: Evacuation Plan and Procedures

3. **Fire Safety.** OSHA recommends that all employers have a Fire Prevention Plan. A plan is mandatory when
Colorado Compliance Assistance
Network Newsletter

- Quarterly e-newsletters to 1500+
- E-Alerts on upcoming events
- Secondary distribution estimated at over 9,000
Comments?
Questions?
Concerns?