SafetyResources

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July - September 2012

Inside this issue:

A Message from the President
Kristin VanSoest

It's an exciting time at Safety Resources, Inc. As we continue our growth, we've welcomed two new staff members to our team. We are thrilled to welcome Bobby McIlquham and Lindsey Yowell to SRI.

This summer sure was a busy one! We have shared our summer with several organizations, in an effort to raise money for a variety of charities, by sponsoring multiple events and golf outings. The season isn't quite over either…we have a few more to go, as well as the start of our own holiday charity tradition. Our staff will be adopting families this holiday season to ensure the less fortunate receive gifts. We look forward to these holiday charities year after year!

We celebrated our commitment to success and the beginning of our 18th year in business with one another and our families this past August at our annual employee/family picnic. We enjoyed a delicious spread provided by Indy Anna's at Eagle Creek Park, and watched our future leaders (our children!) play and enjoy each other.

We are looking forward to the final quarter of this amazing year, and all that 2013 will bring us.

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Interpreting the Interpretation Letter
Part 1 - "Vertical Wall Studs as Fall Protection"
By: Matt McCreery

"When OSHA responds to these questions, they typically do so through a Letter of Interpretation. These letters are posted on the OSHA website, and address many topics; they are a great resource for employers because they may answer your question(s) about a particular standard or topic."

The Occupational Safety and Health Administration (OSHA) has received thousands of questions and requests for clarification about their occupational health and safety standards from employers, individuals, unions, and other organizations throughout the years. When OSHA responds to these questions, they typically do so through a Letter of Interpretation. These letters are posted on the OSHA website, and address many topics; they are a great resource for employers because they may answer your question(s) about a particular standard or topic. However, be aware that the letters only address the specific question asked, and may not apply to your exact situation. Also, the letters are strictly interpretations issues by OSHA, and do not alter the meaning of the actual OSHA standards. The intent of this newsletter series will be to provide insight into some of the more unique interpretations provided by OSHA.

Some of you may be familiar with the interpretation letter we will be discussing but in case you are not, I will provide a quick synopsis of the letter and the affected standards. On an interpretation letter dated December 22, 2003 Gerald M. Howard the CEO of the National Association of Home Builders presented the following questions to OSHA.

> ***Question (1):*** *Scenario: A 20-inch x 20-inch mechanical chase (chute) extends from the basement to the third floor within a residential structure. On each floor it is formed by wall studs that are 16 inches on center (14½-inch gap between studs). Do the spaces between the studs or the floor holes of the chase require fall protection (such as a guardrail system or cover) under §1926.501?*
>
> ***Question (2):*** *Scenario: An open stairwell 40 inches wide is surrounded on three sides by interior stud walls, within a residential structure (the fourth side has a guardrail across it). The walls are unsheathed and the studs are 16 inches on-center (14½-inch gap between studs). Do the spaces between the studs require fall protection (such as a guardrail system or cover over the stairwell) under §1926.501?*

OSHA responded with established definitions and the following statement which is integral to the interpretation itself.

"The floor holes within the chase would pose a fall hazard to workers on each floor unless exposure to the holes is eliminated or fall protection is provided. As you state in your letter, the 14½-inch gaps between the studs are smaller than those needed to meet the definition of an "opening." As these gaps in the stud walls are not considered wall openings, the stud walls prevent the workers from ***unintentionally*** *falling into the holes in the chase. In most cases, therefore, the studs suffice to prevent exposure of the workers to these holes.*

However, there are situations where it is reasonably foreseeable that workers will ***intentionally*** *step through the framed (but unsheathed) wall studs that surround the hole. For example, in some cases, because of the small size of the hole and its location, employees may step through a chase as a short cut to the opposite side. Another example would be where lighting conditions are so poor that employees may not realize that there is a hole there. In these types of situations, further action would be required."*

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The Importance of Reporting
By: Lindsey Yowell

What exactly is a "near miss"? A near miss is an unplanned event that did not result in injury, illness, or damage – but had the potential to do so. This term can be also be referred to as a "close call", "near collision", or "near hit". Though it may be natural instinct for one to just consider it a lucky day and walk away, many industries are trying to steer away from that and encourage reporting.

For every 300 near miss events there is said to be one serious injury. According to the Bureau of Labor Statistics, in 2010 there were 3.1 million non-fatal injuries in addition to 4,547 fatalities. If you take each injury and multiply it by 300 the result is 931,364,100 near misses for 2010 alone!

There are many benefits of reporting and communicating these events. The major battle is the reluctance of employees to do so. One way to encourage near miss reporting is to engage workers at all levels. Providing a means of noting hazards can increase an employee's ownership in safety. For example, a worker notices that the bollards surrounding a fire hydrant outside are continuously being hit by the delivery trucks. The worker makes note of this so the problem can be addressed. A few days later the employee arrives at work and sees that the posts have been replaced, painted bright yellow, and had reflective tape added around the top portion of each post. This reinforces the workers' self-esteem and engages them in recognizing and solving hazards. This positive feedback encourages the employee to have a questioning attitude and will lead to the assurance that reporting a near miss will be taken at the same importance.

"One way to encourage near miss reporting is to engage workers at all levels. Providing a means of noting hazards can increase an employee's ownership in safety."

You were lucky and walked away from a "near miss" so what should you take with you?

Conduct a root cause analysis to identify where the defect in the procedure or system occurred.

Use this as a learning tool. Communicate to supervisors/employees the event that took place so that everyone is aware of the hazard and possible outcome that can result from such actions.

Encourage employee participation in brainstorming of new procedures/processes that may result in the prevention of a recurrence.

Nearly every company has a designated safety department, but by encouraging the recognition and reporting of near miss events, every employee becomes part of the safety team.

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Tips for Fall Protection

By: Bobby McIlquham

As today's society continues to grow with the demand of workplace safety in virtually every environment, it is important to consider employees and the hazards associated with the type of work he or she performs. Personal Protective Equipment, also known as PPE, plays a critical role in the type of work performed.

The Occupational Safety and Health Administration (OSHA) ensures that the employer is responsible for requiring employees to wear the appropriate personal fall protection in all operations where there is an exposure to high hazardous conditions.

Fall protection is the second most frequently cited OSHA standards violation reported in 2011 in the construction industry. It's reported that falls are among the most common causes of serious work related injuries and deaths. Personal fall arrest systems are designed as a backup safety system for an individual during a work task. In the event of an emergency, fall protection equipment should function automatically to help protect the worker from harm and serious injury.

It's important to understand just how important personal fall protection is to the employers and to their employees. Training is vital when it comes to fall protection. Demonstrations with training seminars are a great way to interact with your employees, and this will give them the understanding of how important fall protection is no matter how big or small a job might be. Proper fit testing of body harnesses to employees, and ensuring that certain sizes match with individual employees, will provide safe practices as well. Ensuring that training is done annually with proper techniques will provide employees a safe workplace.

Keeping your equipment in good condition is also very important to ensure that employees are protected on the job site. Be sure to inspect your equipment frequently, as keeping it clean from debris and proper storage will guarantee a long lasting system to your employees. Things to look for while inspecting your harness before each use are:

Component	What to look for
Harness Webbing	Frayed edges, broken fibers, pulled stitches, cuts, burns, and chemical damage
Harness D-rings	Cracks, breaks, and rough or sharp edges; the D-ring should pivot easily
Harness buckles	Excessive wear, frayed or cut fibers, broken stitching
Harness grommets	Loose, bent, or broken grommets, and punched holes not made by the manufacturer
Lifelines	Wear or deterioration
Anchorages and anchorage connectors	Abrasion and damaged threads or swages. Inspect stitching and loops on synthetic slings for cuts, cracks, or frayed and broken stitching. Look for excessive kinks or damaged steel fibers.

If any of these components have any damages to them, you must remove them and tag each component out of service. Using these helpful tips toward personal fall protection will maintain a long lasting life of the system and will bring workers home to their families the same way they came into the workplace.

Useful Information:

The Occupational Safety and Health Administration (OSHA) have published its Construction's "Fatal Four" in calendar year 2010.

- Falls
- Electrocution
- Struck by Object
- Caught-in/ Between

Interpreting the Interpretation Letter

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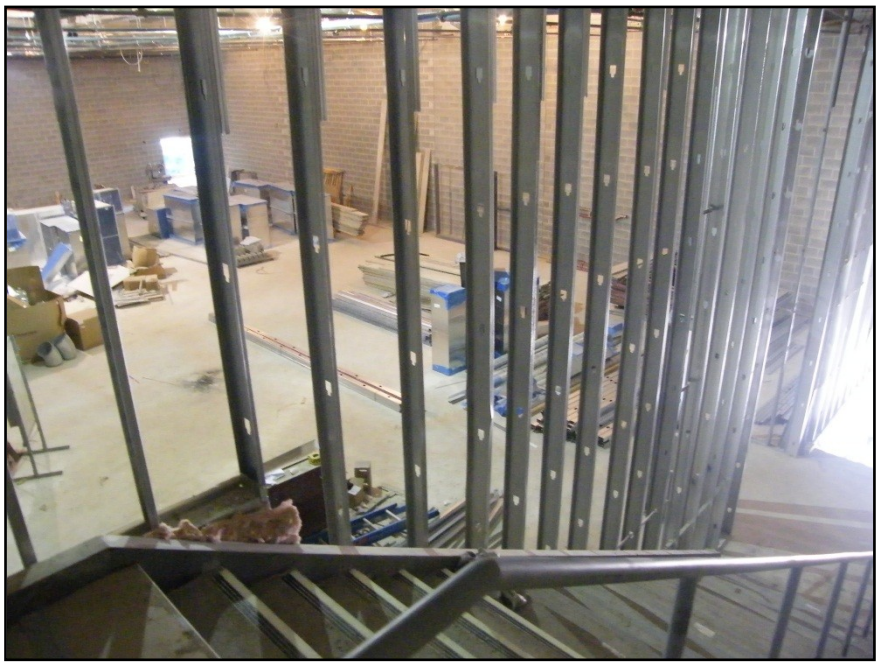
So in layman's terms if you as a Safety Director or Competent Person on-site anticipate or foresee that workers could expose themselves intentionally to the fall hazard then additional fall protection would be needed. This is extremely vague even with the examples given. Take the picture below for example:



While the pictured example per OSHA would be compliant because it is reasonable to assume that a worker would not intentionally step through the opening to fall 30 ft. Does the system pictured truly protect workers from unintentionally falling through the openings if a slip or trip would occur while ascending or descending the staircase? In my opinion the answer to that would be NO. For this scenario not installing an additional guardrail directly effects worker safety and an installed top-rail set at the 42 inch mark or thereabouts would eliminate most fall potentials and would increase area specific safety 10 fold.

So at what point do we as Safety Directors or Competent People take the extra step to improve upon an already compliant system? Think about that question and think about the individual scenario's as they arise. Also, ask yourself what I can do to make this area safer and how my actions will be perceived by my on-site personnel. These types of considerations will help to improve safety perception on-site and could potentially prevent a serious injury from occurring. Safety is not always black and white, and it is not always clarified by interpretation letter dated 9 years previous. Safety is forward thinking and relies on common sense and the willingness to act on issues compliant or not if a risk potential is present. If you are constantly striving to improve workplace safety then a compliant system is not always the best system.

Author's Note: There is an interpretation letter dated on May 25, 2011 discussing the difference between metal studs and wood studs and the safety considerations needed based on the rigidity difference of the two systems. Please follow the link for more information.

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=28058