

2018 OSHA UPDATES

MASMS MEETING



TOP CITATIONS K-12 FACILITIES

Photo: Don Harder/Flickr

MNOSHA NAICS WEBSITE

Elementary and Secondary Schools Facilities
NAICS 6111

https://www.osha.gov/pls/imis/citedstandard.naics?p_naics=6111&p_esize=&p_state=FEFederal

OCTOBER 2017-SEPTEMBER 2018 NAICS 6111

STANDARD	CITATIONS	PENALTY	DESCRIPTION
TOTAL	56	\$47,535	Elementary & Secondary
1910-23	2	\$10,735	Floor & Wall Openings
1910-212	5	\$5,897	Machine Guarding
1910-147	4	\$3,500	LOTO
1910-133	3	\$2,800	Eye & Face Protection
1910-151	3	\$1,879	1 st Aid (eye wash)
1910-28	4	\$1,715	Scaffold Safety
1910-213	2	\$1,500	Woodworking Machinery

SUMMARY OF 109 SCHOOL VIOLATIONS-METRO ECSU

• Fall Protection	25
• Machine Guarding	24
• Electrical	17
• ERK	8
• Compressed Gas	5
• LOTO	5
• Respiratory Protection	4
• PIT	4
• Chlorine Gas/Chem	3
• Emergency Exits	3
• 1 st Aid	3
• Confined Space	2

WORKING AT HEIGHTS



NEW WALKING/WORKING SURFACE & FALL PROTECTION RULE

M N A d o p t i o n i n S e p t . 2 0 1 7

<https://www.osha.gov/walking-working-surfaces/>

- General Industry Rule – applies to educational facilities
- Falls from heights and on the same level (a working surface) are among the leading causes of serious work-related injuries and deaths.
- OSHA estimates that these changes will prevent 29 fatalities and 5,842 lost-workday injuries every year.

INSPECTIONS

- “Regular” documented and scheduled inspections of walking working surfaces
- “as needed” inspections to be conducted when changes or when incident occurs



Antonin Gribovsky - Work in the heights, 1959 #Photography

TRAINING

- If employees exposed to fall hazards and personal fall arrest systems – training required on the job hazard AND specific PPE used



LADDERS

EMPLOYERS MUST ENSURE THAT:

- Rungs & Steps are slip resistant
- Portable ladders not moved/shifted or extended while worker is up
- Portable ladders secure and stable
- No use of top steps or second to top steps
- Not fastened together, placed on barrels/boxes/unstable surfaces to add height
- MUST be inspected prior to initial use on work shift



FIXED LADDERS

2019 – all **new and replacement** ladders attached to building/structure and >24' will require:

- Fall arrest system installed vs. cages or wells

Existing Ladders >24':

- within 2 years install fall protection (cage, well, safety system or fall arrest)
- In 20 years – update only to fall arrest system

Current: **All** inspected prior to initial use on work shift for defects



FIXED LADDERS

Extend 42" above roof

Top Width 24-30"

Rungs are slip resistant



SoftFern.com

LOW SLOPE ROOF WORK

< 6' from Edge:

- Must have guardrail, safety net, restraint or arrest system

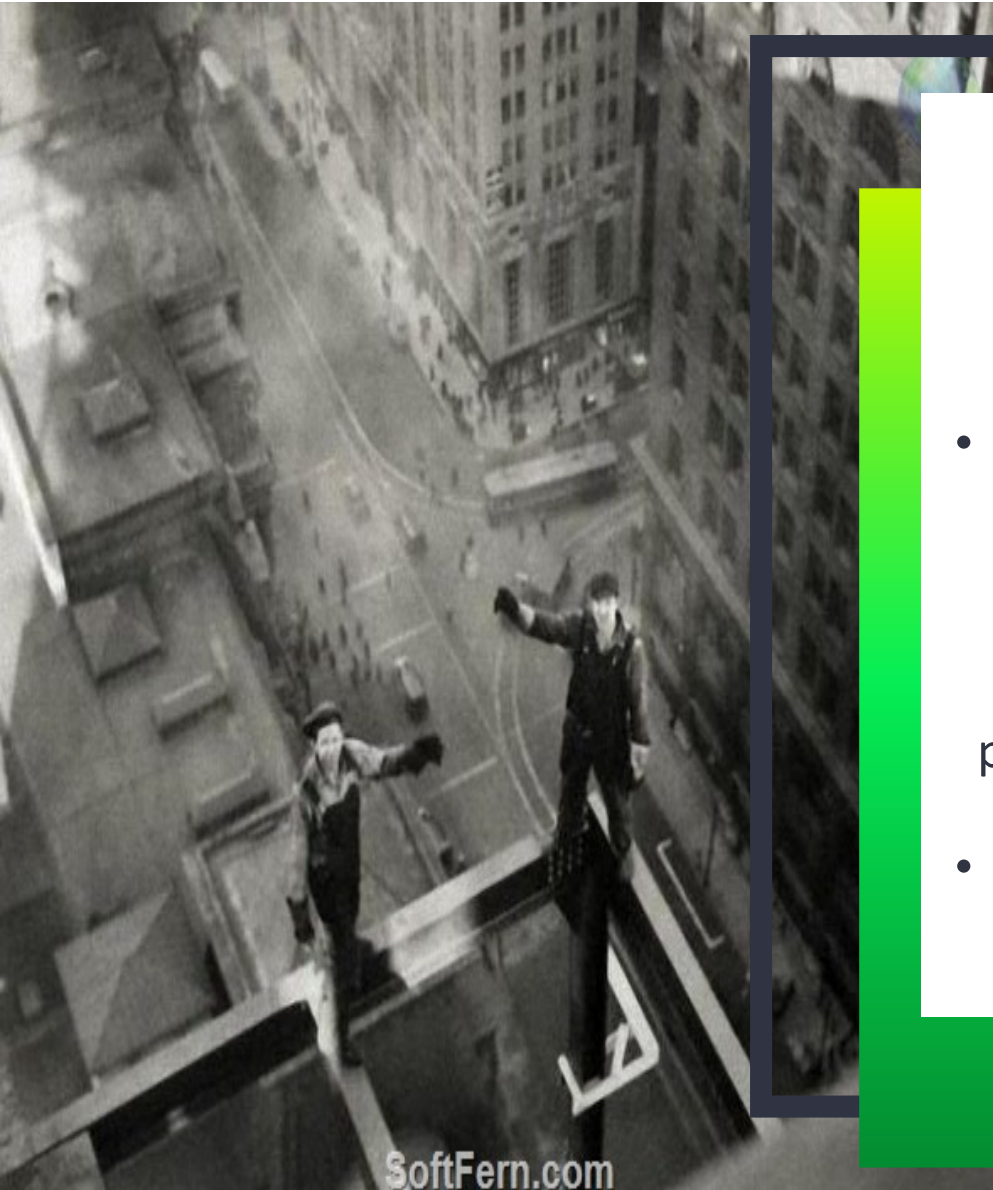
*Regardless of frequency of work



LOW SLOPE ROOF WORK

6' but <15' from Edge:

- Must have guardrail, safety net, restraint or arrest system
- *Can use designated warning system **IF** work is infrequent and temporary



LOW SLOPE ROOF WORK

15'+ from Edge:

- Must have guardrail, safety net, restraint or arrest system

[Employer does **NOT** need to provide fall protection if work is infrequent and temporary]

- Implement and enforce work rule prohibiting approach to edge closer than 15'



LOW SLOPE ROOF WORK

OSHA DISCLAIMER

THERE IS NO SAFE LOCATION ON ROOF!



SILICA RULE

SCHOOL FACILITY IMPACT

GENERAL INDUSTRY

1910.1053

<https://www.osha.gov/laws-regs/regulations/standardnumber/1910/1910.1053>

Action Level: 25 micrograms/cubic meter

8 Hour TWA: 50 micrograms/cubic meter

Employers Must:

- Measure air sampling during suspect activities to determine above/below action level
- Establish dust controls when above action level
- Implement written exposure plan & control measures
- Offer medical exams every 3 years for employees over action level for ≥ 30 days/year
- Training on exposure and controls
- Record keeping of exposure and exams



global.luskin.ucla.edu

SILICA SOURCES –K-12

Construction Dust

Masonry Work

Concrete Work

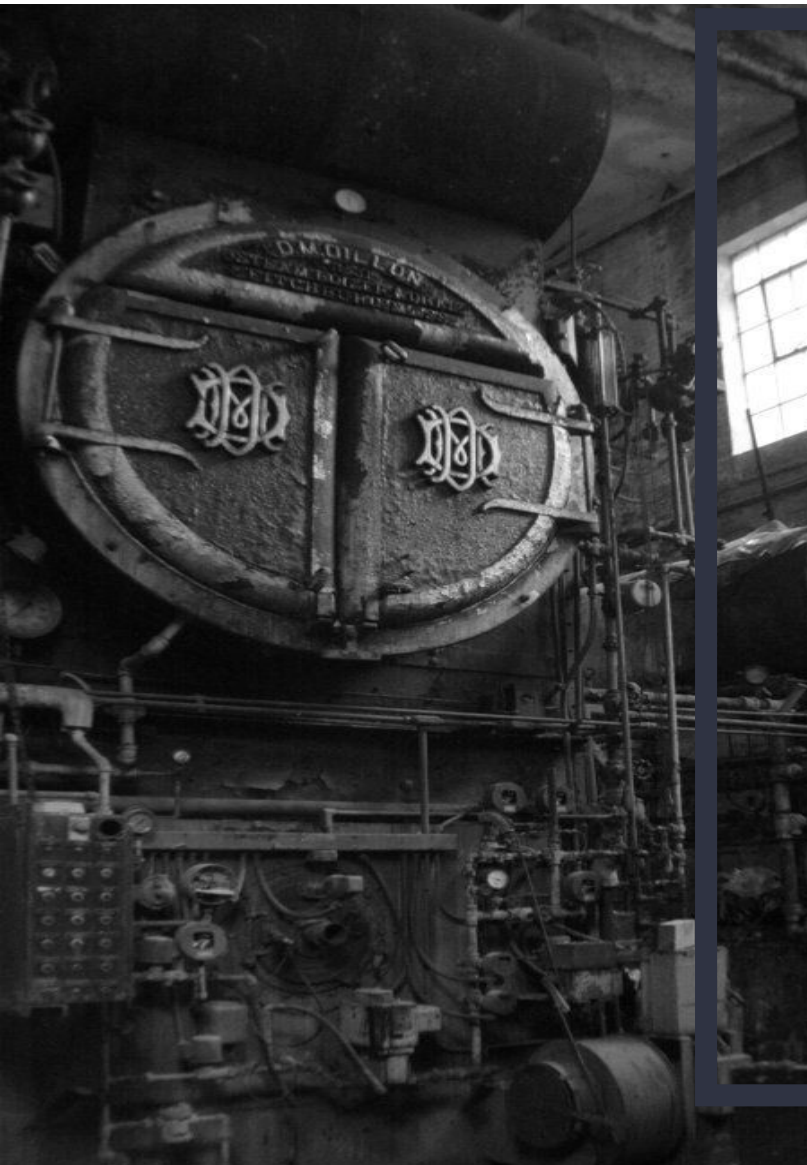
Clay Mixing

Pottery Grinding

The background is a grayscale aerial photograph of a dense urban area with numerous skyscrapers. Overlaid on the left side is a graphic consisting of two nested L-shaped brackets. The outer bracket is a solid green color, and the inner bracket is a black outline. These brackets frame a white rectangular area on the right side of the image, which contains the text.

CONFINED SPACES

OSHA INTERPRETATIONS



ASSESSMENT INTERPRETATION

BOILERS

Permit vs. non-permit classification

- Confined space IF can enter space and perform work
- Permit Required due to potential lack of O_2 from combustion in sealed environment
- Re-Classify to non-permit: LOTO, 4-gas testing, complete reclassification form



ASSESSMENT INTERPRETATION

TUNNELS

Permit vs. non-permit classification

- NOT Confined space if 24" wide & tall enough to walk through
- Permit Required IF has utility lines AND end use equipment or lines are in poor condition



OSHA 300A FORMS

Workplace Injury/Illness

WHO ELECTRONIC FILES?

All Minnesota
Establishments with 20+
Employees



WHEN?

Effective May 21, 2018

Data submitted by July 1,
2018

Videoblocks

THANK YOU

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