

OSHA OVERVIEW

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Health and Safety Committee

OSHA ITEMS TO DISCUSS

1. 300A Data and Submission to OSHA
2. COVID RESPONSE – Inspection Details
3. OSHA National Emphasis Programs
 1. Regional Emphasis Programs
4. Heat Stress Program
5. OSHA Severe Violator Program

1. 300A Data – Reporting to OSHA

- OSHA 300 submission requirements are set to include companies that meet either of the below two criteria:
 - Establishments with more than 250 employees at any period of time within the prior year
 - Companies with more than 25 employees but less than 250 employees at any given time in the prior year, whose principal industry is listed as one of the specified [NAICS codes](#) (ALL Codes in Manufacturing starting with 31,32 or 33)(most of us fit this group.)
- These companies must submit their OSHA 300A form by the required due date. (March 2nd of next year)
- If fall into either criteria and have not reported, YOU SHOULD AS SOON AS POSSIBLE! Late is better than not!

1. 300A Data – Reporting to OSHA

- Reason to report as required-

- OSHA now has **directive** out to **compare submitted 300A data to the record at company.**
 - They should match!! **300 Log to 300 A posting to Electronic data submitted.**
 - If not in OSHA Reporting Data base – **automatic willful violation** is expected in investigation.
 - These start at \$7,000 in most areas of the country.
- If you are not keeping 300A then that is another **willful violation**.

2. COVID RESPONSE – Inspection Details

- The Response Plan specifically requires Inspectors to evaluate:
- Whether the employer has a **written safety and health plan that includes a pandemic plan** (for hospitals, this can be an infection control plan and for other employers, this may be contingency planning for emergencies and natural disasters and incorporated into the company's current health and safety plan);
- **The employer's procedures for hazard assessment and protocols for personal protective equipment (PPE) use;**
- Whether the employer has taken steps to ensure physical distancing and to ensure face coverings are used by employees and others entering the workplace (*e.g.*, customers or the public);
- **Medical records related to worker exposure incidents**, OSHA-required recordkeeping (*e.g.*, 300 logs), and other relevant documents;
- **Respiratory protection program** and any modifications to respirator policies related to COVID-19, such as to address shortages;
- **Employee training records**, including **training on COVID-19 exposure prevention or pandemic preparation**; and
- **Documentation of employer efforts to obtain and provide PPE.**
- **AT THE VERY LEAST HAVE WRITTEN DOCUMENTATION OF EVERY STEP YOU TOOK TO CONTROL EXPOSURE AND SPREADING OF COVID.**

2. COVID RESPONSE – Inspection Details

- POSTING OF INFORMATION –
- Employee given documents on prevention and spread
- Company response plan for exposures and confirmed cases
 - Document any that could be work related – 300 log listed?
- Company effort to provide sanitation products and PPE as needed
 - Extra cleaning – instant hand sanitizer provided – N95 masks made available
 - AC filters changed to HEPA filters in office and break rooms
- Any letters/ written documents given to employee to keep informed of current company status.

3. OSHA National Emphasis Programs

- **Combustible Dust**

- OSHA Instruction - CPL 03-00-008 - [Combustible Dust National Emphasis Program \(Reissued\) - 03/11/2008 - PDF](#)

- **Coronavirus (COVID-19)**

- OSHA Direction - DIR 2021-03(CPL 03) - [Revised National Emphasis Program – Coronavirus Disease 2019 \(COVID-19\) - 07/07/2021 - PDF](#)

- **Hazardous Machinery**

- OSHA Instruction - CPL 03-00-022 - [National Emphasis Program on Amputations in Manufacturing Industries - 12/10/2019 - PDF](#)

- **Heat**

- OSHA Instruction - CPL 03-00-024 - [National Emphasis Program – Outdoor and Indoor Heat-Related Hazards - 04/08/2022 - PDF](#)

- Hexavalent Chromium

- OSHA Instruction - CPL 02-02-076 - [National Emphasis Program - Hexavalent Chromium - 02/23/2010 - PDF](#)

- **Lead**

- OSHA Instruction - CPL 03-00-009 - [OSHA Instruction; National Emphasis Program-Lead - 08/14/2008 - PDF](#)

- **Primary Metal Industries**

- OSHA Instruction - CPL 03-00-018 - [National Emphasis Program - Primary Metal Industries - 10/20/2014 - PDF](#)

Note: This NEP does not set inspection goals nor does it require regional offices to develop emphasis programs, but it does provide uniform procedures for any unprogrammed inspection within these industries, and for any regional or State Plan emphasis program within these industries that may be voluntarily implemented.

- Process Safety Management (PSM)

- OSHA Instruction - CPL 03-00-021 - [PSM Covered Chemical Facilities National Emphasis Program - 01/17/2017 - PDF](#)

- Shipbreaking

- OSHA Instruction - CPL 03-00-020 - [OSHA's National Emphasis Program \(NEP\) on Shipbreaking - 03/07/2016 - PDF](#)

- **Silica, Crystalline**

- § OSHA Instruction - CPL 03-00-023 - [National Emphasis Program – Respirable Crystalline Silica - 02/04/2020 - PDF](#)

- Trenching and Excavation

- OSHA Instruction - CPL 02-00-161 - [National Emphasis Program on Trenching and Excavation - 10/01/2018 - PDF](#)

3. OSHA National Emphasis Programs

1. Regional Emphasis Programs

- [Region 1 - CT, ME, MA, NH, RI, VT](#)
 - [CPL 04-00-024G - Local Emphasis Program for Noise in the Workplace - PDF](#)
 - [CPL-04-00-023G - Local Emphasis Program for Powered Industrial Trucks - PDF](#)
 - [CPL-04-00-002I - Region Wide Local Emphasis Program - Fall Hazards - PDF](#)
- [Region 2 - NJ, NY, Puerto Rico, VI](#)
 - [CPL 2020-11 - Regional Emphasis Program – Noise Hazards - PDF](#)
 - [2019-05 - Regional Emphasis Program – Warehousing and Refuse Handlers and Haulers - PDF](#)
- [Region 3 - DE, DC, MD, PA, VA, WV](#)
 - [2019-14 \(CPL 04\) - Local Emphasis Program for Health Hazards in Metal Fabrication \(Except Structural\) - PDF](#)
 - [2022-01 \(CPL 04\) - Regional Emphasis Program \(REP\) for Warehousing Operations - PDF](#)
 - [2019-02 \(CPL 04\) - Regional Emphasis Program for High Level Noise - PDF](#)

3. OSHA National Emphasis Programs

1. Regional Emphasis Programs

- [Region 4 - AL, FL, GA, KY, MS, NC, SC, TN](#)
 - [CPL 20/03 \(CPL 04\) - Regional Emphasis Program \(REP\) for Electrical Hazards - PDF](#)
 - [CPL 20/05 \(CPL 04\) - Regional Emphasis Program \(REP\) for Noise Hazards - PDF](#)
 - [CPL 21/07 \(CPL 04\) - Regional Emphasis Program \(REP\) for Powered Industrial Trucks - PDF](#)
- [Region 5 - IL, IN, MI, MN, OH, WI](#)
 - [CPL 04-00 \(LEP 008\) - Emphasis Program for Fall Hazards in Construction and General Industry - PDF](#)
 - [CPL 04-00 \(LEP 002\) - Emphasis Program for Powered Industrial Vehicles - PDF](#)
 - [CPL 04-00-27 - Regional Emphasis Program \(REP\) for Exposure to Noise Hazards in the Workplace - PDF](#)
- [Region 6 - AR, LA, NM, OK, TX](#)
 - [CPL 2 02-00-024A - Regional Emphasis Program for Fall Hazards in Non-Construction Industries - PDF](#)
 - [CPL 2 02-00-027A - Regional Emphasis Program for Heat Illnesses - PDF](#)
 - [CPL 2 02-00-023A - Regional Emphasis Program for High Noise in Manufacturing Industries - PDF](#)
 - [CPL 2 02-00-022B - Regional Emphasis Program for Safety & Health Hazards in the Manufacture of Fabricated Metal Products - PDF](#)

3. OSHA National Emphasis Programs

1. Regional Emphasis Programs

- [Region 7 - IA, KS, MO, NE](#)
- [CPL 2-15-01F - Regional Emphasis Program \(REP\) for Powered Industrial Trucks and Other Material or Personnel Handling Motorized Equipment in Construction, General Industry, and Maritime - PDF](#)
- [CPL 02-11-01L - Regional Emphasis Program \(REP\) – Workplaces with Noise Hazards - PDF](#)
- [CPL 02-08-02H - St Louis Local Emphasis Program \(LEP\) for Electrical Hazards in General Industry - PDF](#)
- [Region 8 - CO, MT, ND, SD, UT, WY](#)
 - [CPL 20-07 \(04-05\) - Local Emphasis Program for Scrap and Recycling Industries - PDF](#)
 - [CPL 2022-02 - Regional Emphasis Program - Noise Induced Hearing Loss - PDF](#)
- [Region 9 - AZ, CA, HI, NV, and American Samoa, Guam and Northern Mariana Islands](#)
 - [CPL 04-00-06 - Local Emphasis Program for Smelters - PDF](#)
 - [CPL 02-00-002A - Processing Significant and Novel Enforcement Cases - PDF](#)
 - [CPL 04-00-03 - Regional Emphasis Program \(REP\) for Warehousing Operations - PDF](#)
 - [CPL 04-00-01 - Regional Emphasis Program for Amputations - PDF](#)
- [Region 10 - AK, ID, OR, WA](#)
 - [21-09 \(CPL 04\) - Local Emphasis Program for Powered Industrial Trucks - PDF](#)
 - [21-08 \(CPL 04\) - Regional Emphasis Program for Cranes used in Construction, General Industry and Maritime Employment - PDF](#)
- These states and territories operate their own OSHA-approved job safety and health programs and cover state and local government workers as well as private sector workers. The Connecticut, Illinois, New Jersey, New York and Virgin Islands plans cover public workers only. States with approved programs must have standards that are identical to, or at least as effective as, the federal OSHA standards. Visit OSHA's State Plan States Web page for more information.

4. Heat Stress Program

I. Heat-related Illness –

- I. Identified and employees trained to recognize -

II. Heat-related Illness Prevention Program !!

- A. Acclimatization Program -
- B. Medical Monitoring Program -
- C. Training Program -
- D. Heat Alert Program -

III. Heat Hazard Assessment – **MUST USE HEAT INDEX** and Hazard starts at 80 Degrees F

- A. Step 1: Determine WBGT
 - Step 1, Option A: Using a WBGT Meter
 - Step 1, Option B: Calculating WBGT Using Weather Data
- A. Step 2: Add Clothing Adjustment Factor (CAF) to Determine WBGT Effective
- B. Step 3: Determine the Metabolic Work Rate – Must adjust work/rest cycles depending on work load.
- C. Step 4: Determine the Threshold Limit Value or Action Limit

4. Heat Stress Program



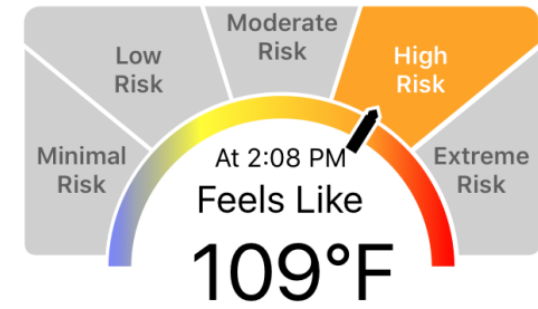
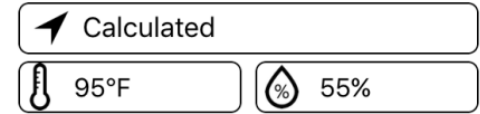
Environmental Measures

- Altitude (Barometric)
- Barometric Pressure
- Compass Direction
- Crosswind
- Density Altitude
- Dew Point Temperature
- Headwind/Tailwind
- Heat Stress Index
- Relative Humidity
- Station Pressure (Absolute Pressure)
- Temperature
- Wet Bulb Temperature (Psychrometric)
- Wind Chill
- Wind Speed/Air Speed

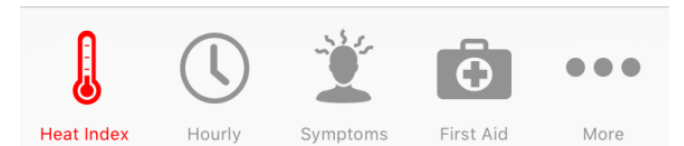


MUST USE THE HEAT INDEX IN PROGRAM

4. Heat Stress Program



Precautions
Conditions are hazardous.



4. Heat Stress Program

- When you're working in the heat, safety comes first. With the OSHA-NIOSH **Heat Safety Tool**, you have vital safety information available whenever and wherever you need it - right on your mobile phone.
- The App allows workers and supervisors to calculate the **heat index** for their worksite, and, based on the heat index, displays a **risk level** to outdoor workers. Then, with a simple "click," you can get reminders about the **protective measures** that should be taken at that risk level to protect workers from heat-related illness-reminders about drinking enough fluids, scheduling rest breaks, planning for and knowing what to do in an emergency, adjusting work operations, gradually building up the workload for new workers, training on heat illness signs and symptoms, and monitoring each other for signs and symptoms of heat-related illness.
- Working in **full sunlight can increase heat index values by 15 degrees Fahrenheit**. Keep this in mind and plan additional precautions for working in these conditions.
- The OSHA-NIOSH Heat Tool is available in English and Spanish for Android and iPhone devices. To access the Spanish version, set the phone language to Spanish.
- Stay informed and safe in the heat, check your risk level.
- For more information about safety while working in the heat, see OSHA's [heat illness webpage](#), including [online guidance](#) about using the heat index to protect workers.

5. OSHA Severe Violator Program

- [OSHA INSTRUCTION: CPL 02-00-169 – Severe Violator Enforcement Program \(SVEP\), September 15, 2022.](#)

- OSHA's SVEP, which concentrates resources on inspecting employers that have demonstrated indifference to their OSH Act obligations by **committing willful, repeated, or failure-to-abate** violations
- OSHA considers an inspection to result in a SVEP case if it meets at least one of the criteria below. All OSHA standards are applicable to SVEP.

1. Fatality/Catastrophe Criterion.

A fatality/catastrophe inspection where OSHA finds at **least one willful** or repeated violation or issues a failure-to-abate notice based on a serious violation directly related either to an employee death, or to an incident causing three or more employee hospitalizations.

2. Non-Fatality/Catastrophe Criterion.

An inspection where OSHA finds at **least two willful** or repeated violations or issues failure-to-abate notices (or any combination of these violations/notices), based on the presence of high gravity serious violations. NOTE: Low and moderate gravity serious violations do not fulfill this criterion.

3. Egregious Criterion.

All egregious (e.g., per-instance citations) enforcement actions shall be considered SVEP cases.

5. OSHA Severe Violator Program

- OSHA will remove an employer from the Severe Violator Enforcement Program Log after at least three years from the date of receiving acceptable abatement verification. To be eligible for removal, the employer must have:
 1. Abated all SVEP-related hazards,
 2. Paid all final penalties,
 3. Where applicable, followed and completed all applicable settlement provisions,
 4. Received no additional serious citations related to the hazards identified in the original SVEP inspection or any related establishments, and
 5. Have received one follow-up or referral OSHA inspection.

5. OSHA Severe Violator Program

- Yes, if an employer agrees to an Enhanced Settlement Agreement they may elect to reduce the SVEP term to two years. In such cases, SVEP removal is contingent on the employer agreeing to developing and implementing a safety and health management system (SHMS), within the two year period, that includes policies, procedures, and practices that are effective to recognize and abate occupational safety and health hazards and protect employees from those hazards.
- Yes, to obtain a complete list of inspections in OSHA's SVEP Public Log, select the following
Link: [Public SVEP Log v2022 06 01.xlsx \(live.com\)](#)

QUESTIONS ?

HEALTH & SAFETY

- Reginald Whitaker, CSP
- Remember WORST ENEMIES?
- Carelessness and Complacency!!!