

GETTING STARTED

OSHA looks for a willingness and good faith effort to protect the health and safety of employees. For distributors who lack any sort of formalized safety program, determining a starting point can be very confusing, considering the number of regulations and potential hazards which must be addressed. The important thing is to get started **now** with a systematic approach to addressing the safety issues facing your company. The following is a suggested approach to compliance.

Safety Policy

An essential element of any safety program is the support and commitment of upper management. Prepare a Safety Policy on your letterhead and post it on the employee's bulletin board or other conspicuous place. The Policy should be signed by the company CEO.

The Policy does not represent a complete safety program, but rather a statement of policy in principle, setting forth basic rights and responsibilities of employees and management. This Policy will be used later as the introductory page to your company's written Safety Program. Policy statements are in §4.

Getting Ready

If you are not able to hire a safety professional to manage your program, designate someone for this purpose and be prepared to give him/her wide latitude in implementing policies. The compliance officer should receive as much training as possible in all aspects of the business where health and safety is concerned.

OSHA publishes a myriad of pamphlets and other literature addressing health, safety, and administrative issues — most are free (see TAB 38 for titles, addresses, phone numbers, etc). Some of the more useful publications for a beginning safety program are:

- OSHA No. 3165, "*OSHA Workplace Poster*"
- OSHA No. 101, "*Supplemental Record of Occupational Injuries & Illnesses*"
- OSHA No. 200, "*Log of Illnesses and Injuries*"
- OSHA No. 2056, "*All About OSHA*"
- OSHA No. 3000, "*Employer Rights Following and OSHA Inspection*"
- OSHA No. 3071, "*Job Hazard Analysis*"
- OSHA No. 3084, "*chemical Hazard Communication*"

OSHA maintains that requests for literature *do not* place you on a “hit list” for targeted inspections.

Management Commitment

As the owner or manager of a small business, your attitude towards job safety and health will be reflected by your employees. If you are not interested in preventing employee injury and illness, nobody else is likely to be.

At all times, demonstrate your personal concern for employee safety and health and the priority you place on them in your workplace. Your policy must be clearly set. Only you can show its importance through your own actions. Demonstrate to your employees the depth of your commitment by involving them in planning and carrying out your efforts. If you seriously involve your employees in identifying and resolving safety and health problems, they will commit their unique insights and energy to helping achieve the goal and objectives of your program.

Consider forming a joint employee-management safety committee. This can assist you in starting a program and will help maintain interest in the program once it is operating. Committees can be an excellent way of communicating safety and health information. If you have few employees, consider rotating them so that all can have an active part in the safety and health programming. Having your employees cooperate with you not only helps to keep them healthy—it makes your job easier.

Here are some actions to take:

- Post your own policy on the importance of worker safety and health next to the OSHA workplace poster where all employees can see it. (See sample policy statements in Appendix.)
- Hold a meeting with all your employees to communicate that policy to them and to discuss your objectives for safety and health for the rest of the year.
- Make sure that support from the top is visible by taking an active part, personally, in the activities that are part of your safety and health program. For example, personally review all inspection and accident reports to ensure followup when needed.
- Ensure that you, your managers, and supervisors follow all safety requirements that employees must follow, even if you are only in their area briefly. If, for instance, you require a hard hat, safety glasses and/or safety shoes in an area, wear them yourself when you are in that area.
- Use your employees’ special knowledge and help them buy into the program by having them make inspections, put on safety training, or help

investigate accidents. (These aspects of a safety program will be discussed elsewhere in this manual.)

- Make clear assignments of responsibility for every part of the program that you develop. Make certain everyone understands them. The more people involved the better. A good rule of thumb is to assign safety and health responsibilities in the same way you assign production responsibilities. Make it a special part of everyone's job to operate safely. That way, as you grow and delegate production responsibilities more widely, you will commit safety and health responsibilities with them.
- Give those with responsibility enough people, on-the-clock time, training, money and authority to get the job done.
- Don't forget about it after you make assignments; make sure personally that they get the job done. Recognize and reward those who do well, and correct those who don't.
- Take time, at least annually, to review what you have accomplished against what you set as your objectives and decide if you need new objectives or program revisions to get where you want to be.

Worksite Hazard Analysis

It is your responsibility to know what you have in your workplace that could hurt your workers. A hazard analysis is an attempt to identify all sources of hazards to employees, whether by reason of a process, work practice, or hazardous condition. As the adage goes, "you can't fix it if you don't know what's broken." OSHA's General Duty Clause requires you to provide a workplace free from *recognized* hazards – this is the underlying theme of what OSHA is all about. Implicit in this duty is the requirement to use diligence to try and discover hazards.

Without a worksite hazard analysis, how can you know what needs correcting? How can you formulate a meaningful safety program, plan safety meetings and training sessions, etc. A detailed discussion of hazard analyses is located behind TAB 6.

A worksite hazard analysis is an ongoing effort and is an important tool to continually improve your program. If you have not yet implemented a safety program, the following is suggested as an *initial* hazard analysis (you should make a more detailed analysis as your safety program gets underway):

- Divide a legal pad into two columns: (1) hazards and (2) unsafe practices. Perform a walk-around of the facility and make a note of any obvious hazards or unsafe practices.

- Interview employees. Employee input is essential for a fair evaluation (you would rather for an employee to express his/her concerns to you than to OSHA!)
- Learn how to do a thorough investigation when things go wrong and someone gets sick or hurt. This will help you find ways to prevent recurrences.
- Examine your accident and injury reports for the past year. Does any condition or work practice which led to the injury still exist?

It doesn't have to be fancy. The important thing is to get started — and start with the obvious!

The next step, of course, is to make a plan to deal with each hazard of which you are aware. OSHA Standards are designed to deal with many common workplace hazards, but some hazards may not be covered by any specific Standard or the Standard may not adequately address your particular situation.

After the initial analysis is completed, each item under "Hazards" should be considered in view of eliminating the hazard. Some hazards cannot be eliminated. If the hazard cannot be eliminated practicably, systems must be devised to control them. This is usually in the form of policies and rules, training, and employee use of personal protective equipment.

Items under "Unsafe Practices" will form the content of your next (or first) safety meeting.

<i>HAZARDS</i>	<i>UNSAFE PRACTICES</i>
<i>1. No handrails on stairs.</i>	<i>1. Dock workers not using hand trucks.</i>
<i>2. Fire extinguishers blocked.</i>	<i>2. John not wearing safety shoes.</i>
<i>3. Complaints about noise when cylinders forks are being blown-down</i>	<i>3. Driving forklifts too fast and with raised</i>
<i>4. Welding cable lying across walking area.</i>	<i>4. Dock workers lifting cylinders from below dock height.</i>

Safety Meetings

Regular safety meetings are a hallmark of management's commitment to safety. If you are not already holding safety meetings at least monthly, begin immediately. Employee attendance should be mandatory.

After you have addressed the items listed under “Unsafe Practices” in your initial hazard analysis, consider using the NWSA’s monthly Safety Topic as a guide for performing safety meetings.

Document all safety meetings. An excellent documentation form is provided on the back of each month’s NWSA Safety Topic, which is mailed to all active NWSA members.

Housekeeping

The workplace must be clean and orderly. A clean and orderly workplace helps reduce accidents and demonstrates management’s commitment to safety. (See TAB 9).

Standards

Not every OSHA standard will apply to your operation; others may apply to only a select few employees. For example, you can limit employee exposure to certain hazards by designating and training specific employees to perform certain tasks, such as entering confined spaces, performing equipment maintenance, driving forklifts, etc.

Some Standards, however, apply to almost all employees in a typical distributorship. With these, you should begin writing guidelines for how you intend to address potential problems. These guidelines (written programs) must contain certain elements which are explained in sections of this manual. Three of the most commonly enforced Standards are the Emergency Action Plan, Hazard Communication Standard, and the Lockout/Tagout Standard:

■ Emergency Action Plan

“Plan for the worst, first.” All employees must know what to do and where to go in the event of an emergency. The principle behind an Emergency Action Plan is to shut down critical operations if time permits, evacuate the facility and notify trained professionals to handle the emergency. An Emergency *Response* Plan is much more detailed than an Emergency *Action* Plan. If you choose to actually respond to an emergency rather than just evacuate, planning and training requirements are much more stringent.

A sample Emergency Action Plan is located behind § 34.

■ Hazard Communication Program

Inadequate hazard communication is OSHA’s no.1 citation and OSHA inspectors *always* ask to see the employer’s written program. Sometimes called, “Employee Right-to-Know,” this standard requires employers to inform employees of the

hazards of chemicals to which they may be exposed and means to protect themselves against those hazards. *All compressed and liquefied gases are considered to be hazardous chemicals.*

A discussion and sample Hazard Communication Program is located in §17.

■ Lockout / Tagout

Many workers are injured due to the *unexpected* release of energy. For example, objects may fall, hydraulic/pneumatic equipment may function once even if power is turned off, electrical switches may be inadvertently turned on during maintenance functions, etc.

OSHA requires a written plan for dealing with the possibility of unexpected release of energy. A discussion and sample Lockout / Tagout Program is in § 20.

Training

Each employee needs to know the following:

- No employee is expected to undertake a job until he or she has received job instructions on how to do it properly and has been authorized to perform that job.
- No employee should undertake a job that appears unsafe. You may be able to combine safety and health training with other training that you do, depending upon the kinds of potential and existing hazards that you have. With training, the “proof is in the pudding” in that the result that you want is everyone knowing what they need to know to keep themselves and their fellow workers safe and healthy.

In addition to the generalized training which is conducted during a safety meeting, employees must be specifically trained to perform their assigned job duties safely and such training should be carefully documented. OSHA’s position is that no employee may be exposed to a hazard for which he/she has not been trained.

Your initial hazard analysis will probably identify an immediate need for training in certain areas. Prioritize your training needs and begin immediately.

Review §14. Also, a list of OSHA-required training is located in §15.

Recordkeeping

If you have more than 10 employees, OSHA requires you to maintain records of employment-related illnesses and injuries. One of these is required to be posted in a conspicuous place for three months during the year.

Please refer to §26.

Written Safety Program

Many of the OSHA Standards discussed in this manual require you to develop a written program of dealing with specific type hazards. These written plans will become a part of your overall safety program.

There are many books, pamphlets, videos, etc. describing how to write safety programs. Although there is no “standard” program appropriate for all operations, most safety experts agree on certain basic elements. These are discussed in §12.

§13 contains a sample basic safety manual. Of course, this sample must be augmented with written programs required by specific Standards, and would be too simplistic for many businesses but is intended to offer you a starting point.

The sample plans included in this manual are basic. They are not, and cannot be, all inclusive. Each distributor should review the plans, delete information not appropriate to his/her operation and include information relative to his/her operation.

Moving Forward

After you have established your basic safety and health program, set up a schedule for regular safety meetings, and have addressed your emergency action and hazard communication plans, you will want to add to and refine your program. At first look, your job may seem overwhelming. Don't get discouraged; a comprehensive safety program is not accomplished in one day. The key is to get started and stay with it.

Help is available through NWSA consultants, insurance company loss control specialists, OSHA consultation services, and other sources (see § 38).

Non-routine Tasks

When an employee is expected to perform any task apart from his/her daily routine (e.g., cleaning an acetylene generator, performing maintenance on equipment for the first time, becoming a “trainee” for a new job, etc.), the risk of injury is increased. Also, odds are good that the job is covered by some OSHA standard. Be prepared to

postpone your current project to address training for this non-routine task; stay flexible enough to devote your attention first to the most likely hazards.

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