

THE UOSH
SAFETY LINE
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Job Hazard Analysis

One of the greatest tools to eliminate hazards in your workplace is a Job Hazard Analysis (JHA). A JHA is a technique of looking at individual job tasks and identifying the hazards that may occur while performing that particular task.

To create an effective JHA you first must learn what a hazard is. A hazard is any item, action, or condition that can cause an injury or illness. Each job performed may include one or more hazards, and by taking the time to perform a JHA you can identify what these hazards are. Any hazard that puts an employee in imminent danger of injury, illness, or death must be eliminated immediately. Once the most serious hazards are identified there are three ways of eliminating these hazards: Engineering Controls, Administrative Controls, and Personal Protective Equipment.

Engineering Controls are the most effective manner of controlling a hazard. Engineering Controls include: engineering and manufacturing a guard, enclosing equipment, isolating the hazard with interlocks, and other means. With properly engineered controls you can eliminate the possibility for an employee to come in contact with hazards such as rotating or moving parts. If Engineering Controls are not feasible the next most effective option is Administrative Controls. Administrative controls include: written safety procedures, exposure time limitations, signs, alarms, and training. This option still allows employees to come in contact with hazards, but it gives them the tools to know where the hazard is and how to avoid it. The last option to control employee exposure to a hazard is Personal Protective Equipment (PPE). PPE includes: gloves, safety glasses, respirators, hand tools, and hearing protection. PPE as a control is only allowed in the following circumstances: where engineering controls are not feasible or totally eliminate the hazard, while engineering controls are being developed, when safe work practices do not provide sufficient additional protection, and during emergencies when engineering controls may not be feasible.

When performing a job hazard analysis you need to look at: What can go wrong? What are the consequences? How could it happen? What are other contributing factors? How likely is it that the hazard will occur? Here is an example of a Job Hazard Analysis (taken from OSHA publication #3071):

Job Location: Metal Shop **Analyst:** Joe Safety **Date:**

Task Description: Worker reaches into metal box to the right of the machine, grasps a 15-pound casting and carries it to grinding wheel. Worker grinds 20 to 30 castings per hour.

Hazard Description: Picking up a casting, the employee could drop it onto his foot. The casting's weight and height could seriously injure the worker's foot or toes. **Hazard Controls:** Remove castings from the box and place them on a table next to the grinder, wear Steel-toe shoes with arch protection, Change protective gloves that allow a better grip, use a device to pick up castings. **Hazard Description:** Castings have sharp burrs and edges that can cause severe lacerations. **Hazard Controls:** Use a device such as a clamp to pick up castings, wear cut-resistant gloves that allow a good grip and fit tightly to minimize the chance that they will get caught in grinding wheel. **Hazard Description:** Reaching, twisting, and lifting 15-pound castings from the floor could result in a muscle strain to the lower back. **Hazard Controls:** Move castings from the ground and place them closer to the work zone to minimize lifting. Ideally, place them at waist height or on an adjustable platform or pallet. Train workers not to twist while lifting and reconfigure work stations to minimize twisting during lifts.

An effective JHA involves employers, supervisors, foremen, and the workers doing that particular job. If your employees are performing complex, or many different processes, professional assistance may be required. One assistance program that is available to small businesses working in high hazard industries is the Utah OSHA Consultation Program. A highly trained OSHA Consultant will come to your workplace and assist you in preparing a JHA for your company. This service is at no-cost, with no citations or penalties. For more information, please call Utah OSHA Consultation at 801-530-6855. More information on the Utah OSHA Consultation Program can be found on our website at <http://laborcommission.utah.gov/UOSH>. A downloadable booklet on Job Hazard Analysis can be found at: <http://www.osha.gov/Publications/osha3071.html>

In next months
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- Ladder Safety
- Common Questions Concerning OSHA Construction Standards (29 CFR 1926)

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Permit-Required Confined Spaces



NOTE: To identify if you have a permit-required confined space use the flow chart on page 3.

Utah OSHA
Compliance
801-530-6901

Utah OSHA
Consultation
801-530-6855

Utah Labor
Commission
801-530-9000

Many workplaces contain spaces that are considered to be dangerous due to their configuration. These spaces have an increased risk of exposing employees to serious injuries including entrapment, exposure to hazardous atmospheric conditions, and engulfment. Working in these confined spaces can also expose employees to machinery components that they would normally not come in contact with, or the employees could also be in a space with restricted airflow. Because of the many hazards associated with Confined Spaces OSHA requires workers to have a permit to enter these hazardous spaces.

By definition, a confined space:

- Is large enough for an employee to enter fully and perform assigned work;
- Is not designed for continuous occupancy by the employees; and
- Has a limited or restricted means of entry or exit.

These spaces may include underground vaults, tanks, storage bins, pits, vessels, silos, and other similar areas.

By definition a permit-required confined space has one or more of these characteristics:

- Contains or has the potential to contain a hazardous atmosphere;
- Contains a material with the potential to engulf someone who enters the space;
- Has an internal configuration that might cause an entrant to be trapped or asphyxiated by inwardly converging walls or by floors that slope downward and taper to a smaller cross section; and/or
- Contains any other recognized serious safety or health hazards.

OSHA's standard for confined spaces (29 CFR 1910.146) contains the requirements for practices and procedures to protect employees in general industry from the hazards of entering permit spaces.

As an employer you are required to evaluate your workplace to determine if you have spaces that would be considered confined spaces. By following the follow chart, on page 3, you can determine which spaces in your workplaces would qualify as a confined space.

Any employer who allows employee entry into a permit space must develop and implement a written program for the space. The employer's written program should establish the means, procedures and practices to eliminate or control hazards necessary for safe permit entry operations.

The employer not only is responsible for the personal protection equipment that employees would use for confined spaces, the employer is also responsible for other equipment that may be required for safe entry into a permit space such as, but not limited to: testing, ventilating, monitoring and communications equipment; barriers and shields, ladders; and, retrieval devices.

If hazardous conditions are detected during an entry, employees must immediately leave the space. The employer must evaluate the space to determine the cause of the hazardous atmosphere and modify the program as necessary. The employer must take effective measures to prevent unauthorized entry. Employers must notify any contractors whom they hire to enter permit spaces about: the permit spaces and permit space entry requirements; any identified hazards; the employer's experience with the space, such as knowledge of hazardous conditions; and precautions or procedures to be followed when in or near permit spaces.

The entry permit must include: Name of permit space to be entered, authorized entrant(s), eligible attendants and individuals authorized to be entry supervisors; test results; tester's initials or signature; name and signature of supervisor who authorizes entry, purpose of entry and known space hazards; measures to be taken to isolate permit spaces and to eliminate or control space hazards, name and telephone of rescue and emergency services and means to be used to contact them; date and authorized duration of entry; acceptable entry conditions, communication procedures and equipment to maintain contact during entry; additional permits, such as for hot work, that have been issued authorizing work in the permit space; special equipment and procedures, including personal protective equipment and alarm systems; and, any other information needed to ensure employee safety.

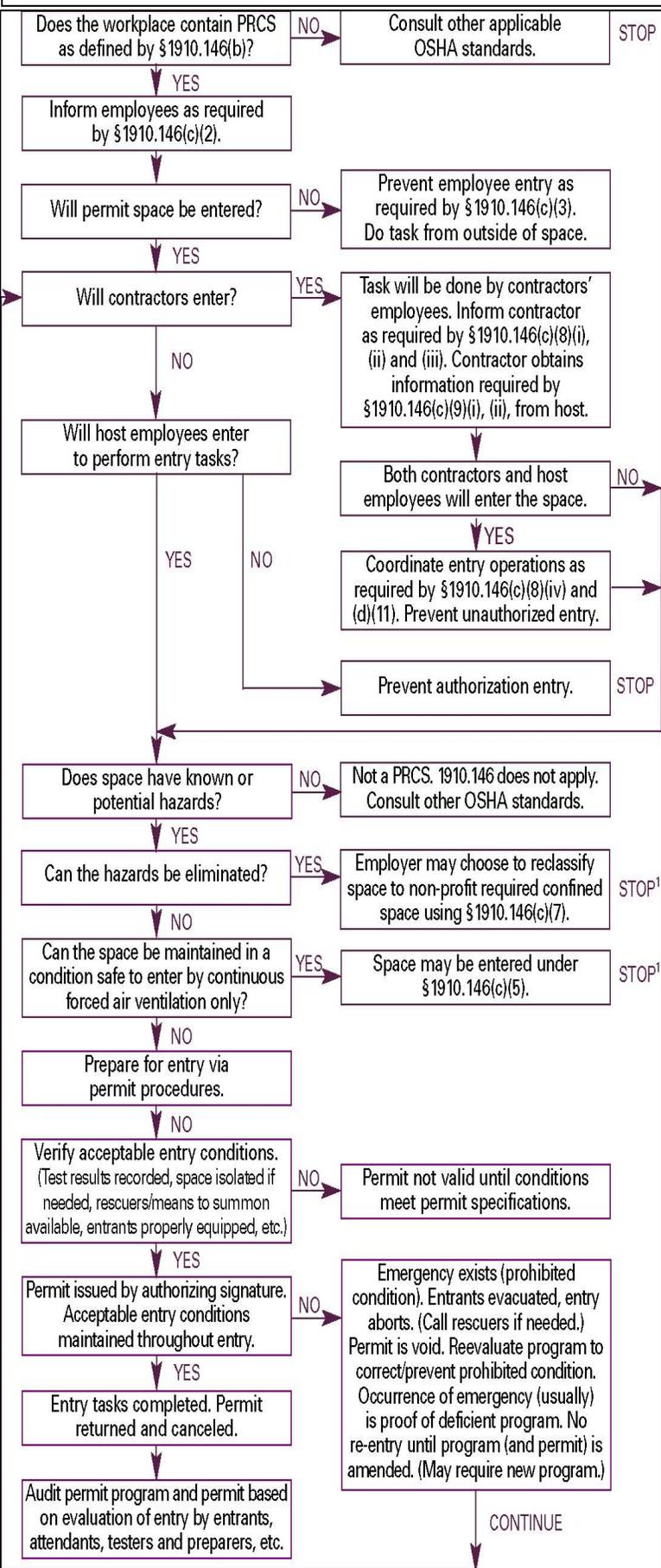
All workers who are required to work in permit spaces must receive proper training. After the training has been provided the employer must ensure that the employees have acquired the understanding, knowledge, and skills necessary to safely perform their duties.

When changes occur in the permit space program or there is a new hazard identified in the permit space, or if there are deficiencies in an employees training, additional training must be held.

For more information on Permit-Required Confined Spaces please go to:

<http://www.osha.gov/Publications/osha3138.html>.

Permit-Required Confined Space Decision Flow-Chart



Compliance Corner

Do I need to record a workplace injury that resulted from a fight at my workplace?

A question was posed to OSHA regarding such an act and the recordkeeping rule is explained in a letter of interpretation. The instance that raised the question arose from two supervisors that had completed their work for the day and had entered the change trailer to change clothes and proceed home. There was some bantering back and forth concerning how to beat the traffic at shift's end. The discussion escalated into a physical confrontation where one supervisor allegedly pulled a knife and struck the other in the bicep, causing a laceration that required sutures to close the wound. OSHA's response was: "Under 29 CFR Subpart C, and injury must be recorded if it is work-related, is a new case, and meets one or more of the general recording criteria. An injury is presumed to be work-related if it results from an event occurring in the work environment. We assume the supervisors were in the change trailer as part of their work or as a condition of their employment. If our assumption is correct, the injury resulted from an event occurring in the work environment and was thus work-related. When a work-related injury requires treatment beyond first aid, it is recordable unless it falls within one of the 1904(b)2) exceptions to the geographic presumption".

Violence in the workplace does not generally qualify as an exception. The Recordkeeping rule contains no general exception, for purposes of determining work-relationship, for cases involving acts of violence in the work environment. However, some cases involving violent acts might be included within one of the exceptions listed in section 1904.5(b)(2). For the complete letter of interpretation go to: http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=9636

Fatalities

Utah had one workplace fatality during the first quarter of Federal Fiscal Year 2010 (October 1, 2009 – December 31, 2009). Region VIII, which includes Utah, Colorado, and Wyoming, Montana, North Dakota, and South Dakota, had a total of 11 workplace fatalities during that time period. The following is the break down on causes of fatalities:

Struck-by: Four Workers, Falls: Three Workers
 Engulfment: Two Workers, Explosion/Fire: One Worker, Drowning: One worker
 Fatalities for Federal Fiscal Year 2009: Utah: 12, Region VIII: 43. The Fatalities for FFY 2009 were exactly half of the total for 2008.

If you have questions on how to make your workplace safer, please call the Utah OSHA Consultation Program 801-530-6855.