

Working together for a safer, stronger future.

Best Practices from the Star Valley Chapter

Star Valley Chapter Membership

November 12, 2018

Best Practices

- Chemical Management
- Slip, Trip & Fall Prevention
- An Inspection Program
- A Machine Guarding Program

Chemical Management

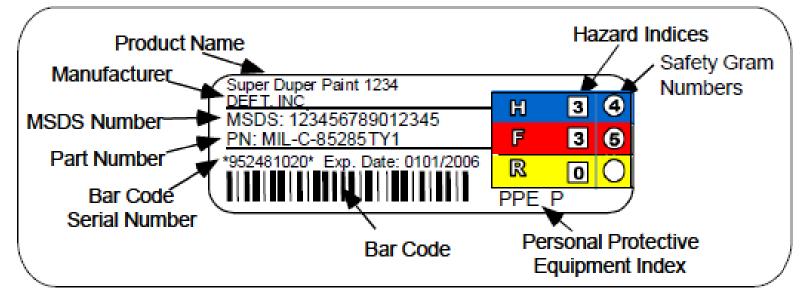
Inventory Control and Regulatory Compliance

Chemical Management

- Inventoried all chemical products
- Identified similar products
- Selected two similar products for use
- Established a "pharmacy" to dispense & distribute chemicals and PPE
 - Eliminated dozens of flammable liquid lockers
 - Saved thousands in purchasing chemicals
 - Created a "K-Mart", one-stop shopping

Chemical Management Continued

- Multipurpose Chemical Label
 - Identifies product
 - SDS number
 - Part number
 - Degree of Hazard
 - Safety Gram ref.
 - PPE Index
 - Barcode



- Quantity use documentation by weight
- Air pollution permit records
- Respiration certification go; no-go

Slip, Trip & Fall (STF) Prevention

A Program Manual

STF Prevention

- Slip, trip and fall prevention encompasses the following elements:
 - Organizational responsibility assignment
 - Hazard assessments techniques
 - Slip, trip and fall prevention by design
 - Slip, trip and fall prevention by administrative controls
 - Personal protective equipment
 - Inspections
 - Reporting Unsafe Conditions
 - Reporting slips, trips & falls
 - Accident/Incident Investigation
 - Training



STF Prevention Policy

Policy:

- It is the policy of x to provide a workplace free of recognized hazards.
- A key point in this policy is the design, installation and maintenance of flooring and work surfaces that are free of slip, trip and fall hazards.

Responsibilities

- Senior management: assuring that personnel and economic resources are sufficient to implement this plan.
- Facilities largest role in slip, trip and fall prevention.
 - Designs building layouts, has facilities maintenance contract oversight, and has responsibility for repair and facilities-related problem resolution.
- Process Designers related to materials and equipment
 - Responsible for engineering out preventing slip trip or fall hazards by engineering and/or administrative controls and/or process substitution.

STF Prevention Responsibilities

Supervision:

- Maintaining the work environment free from recognized hazards.
- Addressing unsafe conditions/actions that could cause a slip, trip or fall.
- Investigation all injuries.

All Personnel:

- Observing facility signs and warnings regarding the presence of slip, trip and fall hazards
- Reporting slip, trip or fall hazards and incidents

Contractors:

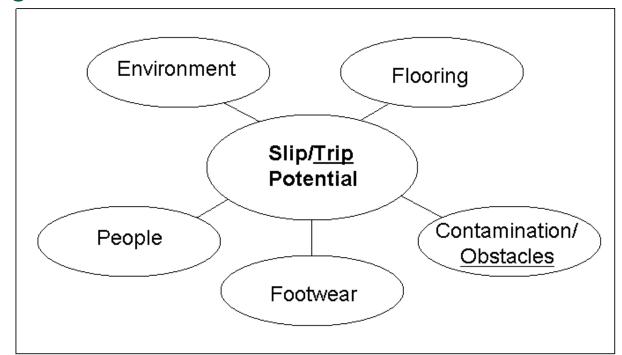
 Keep assigned walking/work surfaces free from slips, trips and falls and identify areas where surfaces may be conducive to slips, trips or falls.

STF References

- 29 CFR 1910 Subpart D, Walking/Working Surfaces
- 29 CFR 1926 Subpart C, General Safety and Health Provisions
- ANSI A117.1, Specifications for Making Buildings and Facilities Accessible to, and Usable by, Physically Handicapped
- ANSI A1264.2-2001, Provision of Slip Resistance on Walking/Working Surfaces
- ASTM C1028-89, Test Method for Ceramic Tiles
- ASTM F1679-96, Test Method for using English XL
- National Fire Protection Association 101, Life Safety Code
- Public Law 101-336, Americans with Disabilities Act

Hazard Assessment

- Performed in accordance with ANSI/ASSE A1264.1-2001, Standard for the Provision of Slip Resistance on Walking/Working Surfaces.
 - Analyzing factors



Analysis of Risk Factors

- Slip Hazards
 - Environment
 - Flooring material & treatment
 - People Gait dynamics affected by age, disabilities, health & emotional state
 - Footwear types
 - Contamination of floor surfaces

- Trip Hazards
 - Environment changes in elevation, carpet transition, thresholds, stairways or ramps
 - Obstacles
 - Environment, flooring, people etc.

Design Considerations

Flooring Materials

- The Americans with Disabilities Act Accessibility Guidelines (ADAAG) requires newly-constructed or altered ground and floor surfaces of accessible routes on sites and in buildings and facilities are stable, firm, and slip-resistant.
- All flooring materials planned for use must be reviewed and approved by ESH&M to help assure proper flooring is provided based on application, tasks and processes. In selecting proper flooring, credence shall be given to:
 - Flooring materials
 - Slope of travel
 - Activities and processes having the potential to create slip and trip hazards
 - Characteristics flooring exhibits when wet or exposed to contaminants possible that may be found in the area where the floor is located

Design Considerations Continued

Floor Treatments

- Where it is not practical to replace flooring, techniques including but limited to, etching, scoring, grooving, brushing, appliqués, coatings, tapes and sprays shall be used to provide acceptable slip resistance.
- Facilities and ESH&M evaluation of flooring and the work environment to identify appropriate control methods.
 - This evaluation could include bringing in experts in the field such as manufacturer's representatives, consultants and sellers

STF Administrative Controls

- Housekeeping Program:
 - Written Maintenance Procedures:
 - Established cleaning schedules
 - Use of signs where cleaning operations are occurring which alert employees of potential slip hazards
 - Timely reporting and cleanup of conditions that can result in STFs.
 - Training:
 - Inspection, maintenance and cleaning requirements
 - Inspection, maintenance and cleaning methods
 - Safe handling and disposal of chemicals and/or solutions
 - Safe operations of maintenance and cleaning equipment
 - Recordkeeping and reporting related to housekeeping and maintenance

STF Administrative Controls Cont'd

- Training Definitions
 - <u>Fall</u>: Occurs when a person's center of gravity is shifted such that balance can no longer be maintained.
 - Falls from slips and trips include falls from walking surface to the same level, from walking surfaces at different levels, from ladders, from stairways, and from ramps
 - Slip: A slip is a fall on the posterior.
 - Slips occur when a person's foot or feet unexpectedly slide(s) on the walking surface.
 - Trip: a trip is a fall on the face.
 - Trips occur when a person's foot unexpectedly encounters an unseen object, sticky surface or step-down on the walking surface.

Monitoring for STF Conditions

Supervisors:

- Inspecting all walking surfaces under the supervisor's responsibility
- Promptly notifying personnel responsible for clean up
- Placing signage, barriers or personnel until clean up is complete

All employees:

- As a part their role in the accident prevention program, to report any unsafe condition or concern via the "report a concern" website
- ESH&M

STF Prevention Devices and Methods

- Rugs, Mats and Runners
 - <u>Installation</u>: when walking surfaces do not meet slip resistance criteria or to address slippery conditions related to inclement weather
 - <u>Placement</u>: provided at door entrances where tile, linoleum or other potential slippery surface is present.
 - Mats/runners should be at least 10 strides long to properly dry shoe soles.
 - Foot prints or water prints should not be seen on the floor beyond mat
 - Shall be adequately secured to prevent movement
 - Inspection & change out often before saturation such that they can no longer absorb moisture; develop mold or become damaged

Prevention Devices & Methods Cont'd

- Rugs, Mats and Runners
 - Maintenance: Procedures shall be established to assure cleanliness and function of rugs, mats and runners.
 - Degree of maintenance required is dependent inspections.
 - Procedures: for placement, maintenance, inspection and storage
 - When stored, must be done in a way that prevents curling of the edges.

Prevention Devices & Methods Cont'd

- Warnings provided whenever a slip/fall hazard has been identified until appropriate corrected.
 - <u>Symbols and Warning Signs</u> Shall be used to identify slip/fall hazard. Suggest meet ANSIZ535.3-1991, Criteria for Safety Symbols.
 - <u>Barricades</u> For slip/fall hazards that cover an entire walkway where personnel cannot be safely routes around the hazard.
 - <u>Employee assignment</u> for detouring personnel traffic until a barricade and signage can be erected or hazard is removed
 - Controlling access to authorized personnel
- Wet umbrella bags & stands
- Use of ladders (no chairs!)







Footwear

- Appropriate for work task and areas.
 - Health and Safety Guide require "sturdy, low-heeled shoes" be worn.
 - "High-heeled, open-toes shoes are prohibited in shop areas and are not recommended on stairs and on many pavements and floors".
- Special Applications;
 - Some activities, such as aircraft wash and wing walking, require the use of special shoes or shoe covers.
 - All personnel must be familiar with and wear the required personal protective equipment specified by procedure or supervision direction.
 - Wherever possible, slip resistant shoes shall be worn.
- Shoe Selection Criteria.
 - Shoes must be selected based on flooring, job tasks and exposure to hazards.
 - Tread design is critical. Special attention is required for the heel of the shoe and indoor or outdoor use.

An Inspection Program

A Program Manual

Inspection Program Overview

- Fundamental to the preservation of a hazard-free workplace whose purpose include:
 - Identify and evaluate hazards before they result in process defects
 - Check results of the inspection against procedures and standards
 - Identify and act upon behavior which could result in loss incidents
 - Reach first-hand agreement and resolution with responsible parties
 - Measure safety performance
 - Display supervision's sincerity about safety performance
 - Determine if the resources being expended by the company in it's hazard abatement program is justified

Inspection Program Overview Cont'd

- Responsibilities for:
 - Senior Management
 - Support program, provide resources, etc.
 - Site Management
 - Participates in inspection
 - Expeditiously takes_action_to repair or resolve safety deficiencies in work areas
 - Safety Department (ESH&M)
 - Develops inspection checklists
 - Prepares and distributes report

Inspection Program Overview Cont'd

Inspection Scheduled

ESH&M contacts inspection team

Inspection Team1:

- Meets at area to be inspected
- Reviews checklist
- Conducts inspection
- Corrects findings that can be addressed others requiring a plan

ESH&M completes checklist, tracking status table and distributes

1. Inspection Team composed of Representative of the Organization responsible for the area being inspected, Facilities and ESH&M.

Responsible Organization:

- Identifies method(s) to address findings
- Writes work orders/procedures, creates designs, etc. to prevent recurrence.
- Completes action plan and distributes

ESH&M:

- Reviews action plans provides recommendations
- Updates abatement tracking status
- Monitors abatement process
- Publishes abatement status monthly

Hazards removed documentation closed

Inspection Checklist

- Incorporates categories specific to area including fire and life safety adopted standards as "tallies", number of occurrences
 - Categories have assigned criticality factors weighted based on the potential severity and frequency of the discrepancy

ESH&M Inspection Finding Priority Determination Chart	Occurrence Potential (Frequency)		requency)
Outcome Description (Severity)	Frequent	Probable	Remote
Catastrophic	RED	RED	YELLOW
An event that may cause severe personnel injury/substantial damage			
to aircraft, facilities, or equipment in excess of \$500,000.			
<u>Critical</u>	RED	RED	YELLOW
An event that may cause personnel injury damage to aircraft,			
facilities, or equipment between \$100,000 and \$500,000.			
<u>Marginal</u>	RED	YELLOW	YELLOW
An event that may cause minor damage to aircraft, facilities, or			
equipment between \$1000 and \$100,000.			
Non-compliance	RED	YELLOW	YELLOW

Inspection Checklist Continued

Priorities (Red & Yellow):

- Grievous or serious discrepancies of the OSHA or contractual safety standards and regulations that requires immediate action to prevent personnel injury or illness or damage to facilities and assets.
- Can be cited by an OSHA compliance officer
- Requires immediate action to abate the hazard (i.e. LOTO, establishing barriers to prevent exposure, etc.
- Has the potential to become more severe and/or costly if not resolved.
- Red priority doubles tally
- Completion of an abatement plan within 5 days. Failure to submit elevates to the next level of Management.

Inspection Checklist Continued

 Safety score (tally frequency & severity score) indicates safety "health"

Safety	# Tallies or Average	
Score	Tallies	
Blue	1 Tallies	
Green	2 - 6 Tallies	
Yellow	5 - 10 Tallies	
Red	> 10 Tallies	

Inspection Finding Abatement

- Each inspection finding listed and attached to inspection report.
 - Finding/Observation Number
 - Finding/Observation Description and Priority Code
 - Organization and Person Responsible for Correction
 - Hazard Description/Comments
 - Status/Suspense Date
 - Days Delinquent (if necessary)

Inspection Finding Abatement Continued

- Documents and tracks actions closure
- Published each month until each finding is closed.
- "Days delinquent" metric measures responsiveness in addressing and closing discrepancies

A Machine Guarding Program

Guarding & Shop Safety

Applicability & Purpose

- Applies to safeguarding machines, tooling, related systems & processes & shop practices
- Program composed of
 - Policy
 - Employee Safety
 - Guarding Techniques
 - Inspections
 - Maintenance
 - Machine Controls
 - Power Press Safety

- Procurement of Machinery
- Modification of Machinery
- Risk Assessments
- Training
- Emergencies
- Machine Guarding Committee
- Responsibilities

Related Forms

- Light Curtain Laser Scanner Checkout Procedure
- Function-testing Procedure for Two-hand Controls
- Function-testing Procedure for Two-hand Trips
- Emergency Stop Function-testing Procedure
- Interlock Function-testing Procedure
- Safety Mat Function-testing Procedure
- Mechanical Power Press Weekly Inspection & Test Record

Policy

- The National Safety Council has determined the most frequent cause of injuries related to industrial machinery is due to unsafe work practices and use of incorrect procedures. To assist in preventing these injuries, the following five-point policy has been established:
 - Operation, adjustment and repair of any machine tool is restricted to authorized, trained personnel.
 - Each machine must be operated in accordance with good work habits. Taking short cuts, performing unauthorized tasks, and using equipment as it was not intended is prohibited.
 - Each machine must be evaluated to determine if guards are in place and machine is operating as intended at the start of each shift or upon first use.
 - Supervision is responsible for enforcement of this policy.
 - Any injury from industrial machinery, no matter how slight, must be reported in accordance with established procedure.

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Employee Safety

- Utilize proper guarding and established procedure
- Wear proper attire:
 - Loose-fitting clothing, jewelry or other items that can be entangled in machinery is prohibited
 - Personnel with long hair shall wear their hair under a cap or otherwise contained.
- Immediately report defective/misaligned guards to supervision
- Ensure material, scraps, etc., do not accumulate as create a hazardous condition
- During machine operation, listen for new vibrations or noises that could indicate loose parts, overloading, lubrication issues or other potential problems. Upon detection, immediately stop machine and report observations to supervision.

Machine Guarding Techniques

- Machines where the point-of-operation (POO) exposes employees to injury shall be guarded
- Guard shall be so designed and constructed to prevent the operator from having and body part in the in the danger zone during operation
- Operator should not be allowed to reach over, around or through the guard to reach the POO.
- Method choices are identified.

Special Tools

- Special hand tools can be used for placing and removing material to and from the POO without the operator placing their hand in danger zone
- Hand tools may not be used in lieu of required guarding, tools are supplementary protection.

Safety Shields

- Not a substitute for traditional guarding. Are considered awareness devices, that can be used if certain criteria is met:
 - Approved by Safety
 - Direct contact to the POO with any part of the operator's body cannot be made
 - Shield construction must be substantial enough to provide protection upon contact.
 - Supplement hand tools are used.
 - Shields are situated such that maximum distance protection is provided.
 - Shields are inspected prior to use as shield deteriorate (become opaque and brittle) with age, use, exposure to chemicals.

Testing of Control Devices

- Devices: interlocks, presence-sensing devices(light curtains, scanners, mats etc.), two-hand controls & two-hand trips
- Testing in accordance with manufacturer's recommendations
- Typically upon installation, maintenance, adjustment, repair or modification or device removal/disabling
- Light curtains after "channel select" or "floating blank" enable/disabling
- Use manufacturer's test forms or prepared forms meeting criteria

Power Press Safety (OSHA)

- Especially mechanical power presses
- Dies identification (press tonnage stroke requirements, weights, special transfer instructions)
- Die-setting procedures
- Safety block usage & installation
- Inspection requirements
- Power press related injuries reported to OSHA within 30 days

Procurement of Industrial Machinery

- Shall meet specified design standards to ANSI standards is desirable – Most OSHA standards are 60 years old
- Machines designed and built to European (CE), international (ISO) or other standards are not recognized by OSHA
 - Electrical most important NEC/NFPA 79
 - Risk assessments
- Specify BS EN ISO 12100:2010 assessments
 - Makers producing for international markets required to provide assessments so that users can analyze risk & develop safeguards to address identified hazards

Machinery Modification

- Machine's manufacturer must be consulted to assure anticipated modifications will not void warrantees, create unforeseen hazards or production issues.
- Risk assessment recommended to assure personnel safety and regulatory compliance is not compromised
- Instructions related to modified machinery must be evaluated to address any new use, operating or maintenance procedures

Risk Assessments

- Performed by procedural guidelines for machines that:
 - Present more than a tolerable risk
 - Potential exposure to the point-of-operation or other hazards
 - Where there is a history of incidents related to machine or tasks
 - Designed in-house machines
 - Incorporate presence-sensing devices
 - Used machinery purchased by the company

Training

- Required for all personnel operating, inspecting or maintaining machinery
- OSHA-required training for operators of mechanical power presses:
 - Safe methods of work before initially operating the press
 - Must be adequately supervised to assure correct procedures are observed
 - Operators, inspectors and maintainers must demonstrate continuing competence to their training
 - Inadequate personnel shall be retrained at a minimum

Machine Emergencies

- Designate trained, response personnel to address machine issues such as:
 - Power presses or other machines that could entrap personnel or
 - Most likely would immediate medical attention as a result of machine incident
- Emergency instructions developed for some machines include:
 - Machine drawing with identification of referenced parts
 - Event description symptoms of failure with actions by sequence with photos
 - Extrication instructions
 - Emergency contacts & instructions
 - List of emergency tools & equipment (wrenches, lifting devices, PPE

Machine Guarding Committee

Purpose:

- Perform assessments in accordance with regulatory requirements and guidance and best industry practices
- Recommend machine safeguards and operating methods to protect operators & area personnel, machinery, products and facilities
- Assist supervision regarding their machine guarding responsibilities
- Composed of representatives from engineering, production, safety and supervision from areas of interest

Responsibilities

- Assigned to:
 - Managers (provide resources to implement & maintain machine guarding program
 - <u>Supervision</u> (assure personnel are trained, understand operation, enforce safe work practices, etc.)
 - <u>Engineers</u> (Obtain approval to purchase; assure manufacturer's specifications & requirements are incorporated; develop operating procedures, etc.)
 - Industrial Engineering (Assure manufacturer's requirements are incorporated into PMs; provide maintain instructions; train personnel)
 - Employees (Complying with program requirements)

Appendices

- Principles & Applications:
 - Machine Guarding methods, advantages, limitations
 - Safe guarding devices, advantages, limitations
 - Supplemental guarding methods (hand tools/fixtures etc.)
 - Machine controls (descriptions, functions, identification,
 - Accessories & lighting
 - Machine marking & safety signs
 - Testing & verification
- Samples of safety device checkout procedures

Machine-related Accident Investigation

NOG-L	Machine-related Accident Investigation	on Form Report No
		•
Accident Date & Time Accident Location		ration

Accident Date & Time				Accident Location			
Machine Involved (Name; Model; S/N; SAP#:):							
Operator/Supervisor Interview Details							
Name(s):			Title:				
Hours on the job at the	time of th	ne incident:					
Injured in incident?	No 🗆	Yes 🗌	If Yes, extent	of inju	ry:		
Witness?	No 🗆	Yes 🗌	Yes If Yes, name of witness::				
Task being performed a	Task being performed at the time						
of the incident:							
Task a normal part of th	ne job? 🗀	Operator	Operator authorized to perform task? Operator trained?				
Procedure established		n task?No 🗆	Yes 🗌	If yes,	procedure	number:	
Unusual sights & sound observed?	s	No 🗆 Ye	Yes If yes, specify:				
Defects detected?		Machine?	Machine? No ☐ Yes ☐		If yes, specify:		
		Part/mate	Part/material? No ☐ Yes ☐		☐ If yes, specify:		
Environmental Condition	ons: Lig	ghting: 🗌 Ina	adequate	Temp	erature: 🔲		Noise: 🛛 Excessive
			orne Contaminants: No 🗌 Yes 🗍 Other:				
		yes, contamir	nant:				
Possible incident cause							
Recommended inciden	- 1						
recurrence prevention:		Sketch					
			SKE	tcn			

Machine-related Al Continued

NOG-L	Machine-related Accident Investigation Form	Report No
•		

Identified Hazards & Notes						
Machine Hazards						
☐ Bending components			☐ Punch			
☐ Blade contact @ POO			Pulleys			
☐ Caught on or between			Punch alignme	nt (flake/ex	plosive fracture)	
☐ Crushing			Rear of machin	e blade/pir	nch hazards	
☐ Cutting			☐ Reciprocating a	irms		
Debris drops @ rear of ma	chine		☐ Rotating cutter			
☐ Ejected parts (stock/toolir	ng/dies/ch	uck key)	☐ Rotating parts			
☐ Entanglement			☐ Shear points			
☐ Feed mechanisms			Struck by part ejection (chuck key, work piece)			
☐ Nip points			☐ Transverse mo	ving parts		
☐ Pinch points			☐ Other			
Auxiliary Equipment Hazards						
☐ Auxiliary parts of moving I	☐ Auxiliary parts of moving belts			Pinch point @ hold-down/hand slots/throat gap		
☐ Improperly secured mater	ials		☐ Unprotected foot pedal			
☐ Improper setup/lack of maintenance			☐ Other			
Process Hazards						
Debris from broken comp	☐ Debris from broken components ☐ Slip/trip condition					
☐ Flying metal chipps, shavings, lubricants, sparks and/or cooling fluids		Other				
		Ergon	omics			
☐ Compression/contact stress		Repetition				
Force			☐ Temperature extremes			
☐ Heavy lift			□ Vibration			
Overexertion			☐ Contaminants: Air/gas/aerosol ☐ Liquid ☐			
Noise			☐ Other			
☐ Physical demands						
Posture:						
PPE						
Clothing	☐ Face		☐ Head		Respiratory	
☐ Eye	☐ Hand		Hearing		☐ Fall	
Other:						
Safety Equipment						
Awareness barriers	☐ Hand		Other:			
		Report Pro	epared by:			
Name:		Phone number:		Date:		
Additional comments attached			Associated report(s):			

Questions/Comments

Thanks for your attention!