STAYING AHEAD OF OSHA COMPLIANCE: ARE YOU READY TO POST YOUR FORM 300A? HAVE YOU COMPLETED YOUR HAZCOM TRAINING?

By Jacqueline Bollas Caldwell, Esq.

Employers with more than ten employees and whose establishments are not classified as a partially exempt industry must record work-related injuries and illnesses using OSHA Forms 300, 300A and 301. Partially exempt industries include establishments in specifically listed low hazard retail, service, finance, insurance or real estate industries.

Employers who are required to keep Form 300, the Injury and Illness log, must post Form 300A, the Summary of Work-Related Injuries and Illnesses, in the workplace every year from February 1 to April 30.

Addressing another compliance issue, if your workers are not yet trained on the new Hazard Communication System, now is a good time to complete that training. As of December 1, 2013, employers were required to train workers to ensure that their workers understand the hazards communicated by the new pictograms, labels, and safety data sheets under the revised Hazard Communication System.

If you need any additional information, please feel free to contact Jacqueline Bollas Caldwell of Krugliak, Wilkins, Griffiths & Dougherty Co., L.P.A. at: 330-244-2864 or jcaldwell@kwgd.com.

NOTE: This general summary of the law should not be used to solve individual problems since slight changes in the fact situation may require a material variance in the applicable legal advice.

Stark County Safety Council Mission Statement: To provide a forum for safety and health information, education and networking in Stark County, through leadership, innovation, facilitation, program, and support, in partnership with other public and private organizations.
Q: When do I need to guard machinery or equipment that moves?

A: The Machine Guarding Standard 1910.212 states: “One or more methods of machine guarding shall be provided to protect the operator and other employees in the machine area from hazards such as those created by point of operation, ingoing nip points, rotating parts, flying chips and sparks.” The key is to remember that any equipment or machinery that spins, rocks, rolls, rotates or traverses must be guarded. Not only do you need to consider the operator but any other employee in the shop. Consider these areas when guarding your equipment: point of operation (where the operator stands to perform the work), the sides (including the back of the equipment) and the top and bottom of the equipment. A rule of thumb is “Over, under, around and through”. If guarding is designed properly you should not be able to reach “over, under, around and through” any guard.

General machine guarding requirements:
- Guards shall be affixed to the machine
- Do not offer an accident hazard in itself.

Interesting Facts:
- There are over 3,000 amputations per year in the manufacturing sector.
- Under their 1910.217 regulation, OSHA will often cite a mechanical power press if the key is left in the mode selector switch.
- OSHA requires a “working space depth” of 36” - 48” in front of electrical enclosures to allow enough space to fully open the door.
- OSHA and ANSI put the final responsibility for Machine Safeguarding on the employer even if not provided by the Original Equipment Manufacturer (OEM).
- The first safety light curtain was invented by German Dr. Irwin Sick in 1954.
Safety glasses and the new technology to help comply with this required program for most employers

By: Chris Zabel, U. S. Safety Gear
Stark County Safety Council Steering Committee Member

Most every facility I visit has a mandatory safety eyewear program due to recognized hazards in their workplace. I decided to write this article about new technology and updates in safety eyewear because I regularly meet new customers who don’t know about changes in this very important category of PPE. Safety eyewear has come a long way since employees were seen wearing the Buddy Holly, Airosite, Astrospec and most recently Starlite styles of safety glasses.

Safety glasses today are offered in more styles than we’ve ever seen before with new products hitting the market monthly from various manufacturers. I’ve often heard it said “the best safety glasses are the ones that our employees will wear”. With this thought in mind, I will highlight some newer technology and recommend that you contact a local safety supplier, many of which are involved with our Stark County Safety Council, to help you find some of the products I’ll mention below.

You can purchase bifocal safety glasses similar to the “cheater” reader glasses you’d buy at a drugstore. You pick the correction factor that is needed by employee. You can also purchase “over the glass” safety glasses affordably for visitors or office staff to enter production areas. Some safety glasses are now available with an anti-scratch coating on the outside of the lens and anti-fog coating in the inside of the same lens. There are many shades of lenses available from the indoor/outdoor (clear mirror), amber, blue, green, pink and many mirrored options. Polarized lenses are now offered by most safety glass manufacturers. Some safety glasses are made with removable temples to easily convert from glasses to goggle with an elastic strap. Many glasses are now foam lined to attempt to prevent particulate from getting into your eyes in a dusty workplace or when doing grinding work. The newest development I’ve seen is double lens technology similar to your Scott ski goggles to do a superior job of preventing fogging. This double lens is available in goggles and now in standard individual lens safety glasses. You can also provide your employees with RX safety glasses at a reasonable price.

Look inside the temple of your safety glasses for the ANSI Z87.1+ certification. You may also ask if your safety eyewear products are independently tested by a third party certification company like UL or Underwriters Laboratories. Very functional and comfortable safety eyewear is available at an affordable price to protect your most important asset, your employees!!

If you need any additional information, please feel free to contact Chris Zabel of US SafetyGear Inc. at (330)717-6626 or czabel@ussafetygear.com.