



SPOTLIGHT ON SAFETY

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Industrial Health and Safety Consultants Begins Spotlight on Safety

IH & SC, Inc. announces the initiation of a monthly newsletter about some important issues in the field of industrial hygiene and safety. The purpose of this newsletter is to provide friends and clients a greater understanding of the dynamic world of occupational safety and health, and to keep them acquainted with the various changes in policies and laws that will affect their facilities.

The idea for this newsletter belongs to Denese Deeds, the treasurer/secretary and co-founder of IH & SC, who thought that it would be a particularly useful tool to help keep clients updated with the varying changes to regulations and other new information that affects their products and facilities. She quickly came to Chandra Gioiello, a seasonal employee of the company, to put together the newsletter. It will include sections contributed directly or suggested by the key personnel in the company, Denese Deeds, David M. Gioiello Jr., and Bill Rath. The company looks forward to seeing this newsletter expand and keep them in better communication with their clients.

General Interest

Reminder - Post Injury/Illness Summaries on February 1

Beginning February 1, employers must post a summary of the total number of job-related injuries and illnesses that occurred last year. Employers (including schools and towns in Connecticut) are required to post only the Summary (OSHA Form 300A)-not the OSHA 300 Log -from Feb.1 to Apr. 30, 2004.

The summary must list the total numbers of job-related injuries and illnesses that occurred in 2003 and were logged on the OSHA 300 form. Employment information about annual average number of employees and total hours worked during the calendar year is also required to assist in calculating incidence rates. Companies with no recordable injuries or illnesses in 2003 must post the form with zeros on the total line. All establishment summaries must be certified by a company executive.

The form is to be displayed in a common area wherever notices to employees are usually posted. Employers must make a copy of the summary available to employees who move from worksite to worksite, such as construction workers, and employees who do not report to any fixed establishment on a regular basis.

Employers with ten or fewer employees and employers in certain industry groups are normally exempt from federal OSHA injury and illness recordkeeping and posting requirements. A [complete list](#) of exempt industries in the retail, services, finance and real estate sectors is posted on OSHA's website.

Exempted employers may still be selected by the Labor Department's Bureau of Labor Statistics to participate in an annual statistical survey. All employers covered by OSHA need to comply with safety and health standards and must report verbally within eight hours to the nearest OSHA office all accidents that result in one or more fatalities or in the hospitalization of three or more employees.

Copies of the OSHA Forms 300, 300A and 301 are available on the [OSHA Recordkeeping Webpage](#) in either Adobe PDF or Microsoft Excel Spreadsheet format.

OSHA Offers Tips to Protect Workers from Cold Stress

This winter has been particularly cold and many workers, whose duties require work outdoors may be exposed to extreme cold and be at risk for the development of cold related health problems. Some specific suggestions include:

- Encourage workers to wear proper clothing for cold, wet and windy conditions, including layers that can be adjusted to changing conditions.
- Be sure workers in extreme conditions take a frequent short break in warm dry shelters to allow their bodies to warm up.
- Try to schedule work for the warmest part of the day.

- Remember, workers face increased risks when they take certain medications, are in poor physical condition or suffer from illnesses such as diabetes, hypertension or cardiovascular disease.

For more information – go to OSHA’s website at www.osha.gov.

For free copies of OSHA's Cold Stress Card in [English](#) or [Spanish](#), go to OSHA's website, www.osha.gov, or call 1(800) 321-OSHA.

OSHA Issues Safety and Health Information Bulletin on Mold

This past October OSHA issued a new Safety and Health Information [Bulletin](#) on mold addressing how to prevent mold growth and how to protect workers involved in the prevention and cleanup of mold.

The Safety and Health Information Bulletin is directed primarily at building managers, custodians, and others responsible for building maintenance. It offers recommendations on how to prevent mold growth, proper use of personal protective equipment, ways to assess mold or moisture problems, and methods to cleanup damage caused by moisture and mold growth.

The bulletin also includes checklists on mold prevention tips, how to determine if a mold problem exists, cleanup methods, and mold remediation guidelines based on the size of an affected area to make it easier to select the appropriate techniques. Additional sections address personal protective equipment, sampling methods and remediation equipment.

OSHA has an entire webpage dedicated to mold issues at <http://www.osha.gov/SLTC/molds/index.html>. Additional information on indoor air quality issues, including mold can be found on the following websites:

NIOSH - <http://www.cdc.gov/niosh/topics/indoorenv/>

AIHA - <http://www.aiha.org/SplashPages/html/topic-mold.htm>

For answers to your specific questions on mold or indoor air quality, contact IH&SC’s Indoor Air Quality expert, David M. Gioiello, Jr. CIH, CSP at d.gioiello@ih-sc.com.

Inaccurate MSDS May Lead to Accidents

In recent years more attention has been given to the role that poor quality and inaccurate Material Safety Data Sheets may play in accidents involving chemicals. The U.S. Chemical Safety and Hazard Investigation Board issued a fourth report on an industrial accident that said an inaccurate MSDS played a role in September 2002. Senator Mike Enzi, chairman of the Employment, Safety, and Training Subcommittee of the Senate Health, Education, Labor and Pensions Committee, asked John Henshaw, OSHA

Administrator, in June to provide a report within 60 days on the progress of the agency review of MSDSs and to "describe actions OSHA has taken, and plans to take, to increase MSDS reliability and accessibility".

As a result, OSHA has developed new guidelines on hazard determination and MSDS preparation that should be released in February. OSHA Compliance Staff are also expected to place a greater emphasis on MSDS accuracy and completeness. We will keep you posted when these new tools from OSHA are available.

If you have questions on MSDS requirements or need help developing or improving your MSDS contact IH&SC's MSDS expert, Denese A. Deeds, CIH at d.deeds@ih-sc.com.

School Specific Issues

Asbestos Notification

Once every year, the Local Education Agency (LEA) must notify workers and building occupants (or their legal guardians) that an Asbestos Management Plan is available for their review. The LEA must also inform these people of any asbestos-activities related activities that are planned or in progress. [40 CFR 763.84(c) & (f), 19a-333-2(c) & (f)]

Different school systems notify in different ways. Placing the notification in the school calendar is gaining popularity and meets the regulatory requirements if a copy of the calendar is delivered to all employees and parents. Other means of notification include direct mail to parents or formal notification to the Parent-Teacher Organization. Faculty, staff, and other employees can be notified by posting a notice on employee bulletin boards.

No matter how you notify, be sure to keep a dated copy of the notification in the records section of your Asbestos Management Plan. This item is always considered during management plan audits and is a top five asbestos audit "gotcha." For questions or more information contact our asbestos expert, William R. Rath at w.rath@ih-sc.com.

New State Law about Indoor Air Quality

A new Connecticut state law concerning Indoor Air Quality in schools was approved on July 9, 2003. This law states that all schools "shall adopt and implement an indoor air quality program that provides for ongoing maintenance and facility reviews necessary for the maintenance and improvement of the indoor air quality of

its facilities." The school must report on the status of the facilities to the Commissioner of Education. Any building that is built, renovated, extended or replaced after January 1, 2003 and before January 1, 2008 will have an IAQ inspection funded by the appropriate board of education. These inspections must fulfill certain requirements in their scope, such as an inspection of the heating ducts and moisture incursion.

There is a new classification of a "Certified school indoor air quality emergency" defined as health risk in any building that requires immediate attention and will cost greater than one thousand dollars to fix. Any funding for renovations can be applied for with the Commissioner of Education. Any major building changes must be accepted by the state Board of Education, and there are four restrictions that will prevent a submitted building proposition from being allowed: high or moderate radon levels, unacceptable roof characteristics, failure to incorporate IAQ guidelines, and failure to properly train maintenance personnel that will be working in the new building.

More information about this law can be viewed at <http://www.cga.state.ct.us/2003/act/Pa/2003PA-00220-R00HB-06426-PA.htm>, or contact David M. Gioiello, Jr. CIH, CSP at d.gioiello@ih-sc.com.