



# TRICOR Safety News

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## Remember to post OSHA 300 summary

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Beginning Feb. 1 employers must post the 300A summary of work-related injuries and illnesses that occurred the previous year. Employers are only required to post the Summary (OSHA 300A) from Feb. 1 to April 30. The summary must include:

- Total numbers of job related injuries and illnesses that occurred in 2010 and were logged on OSHA 300 forms.
- Employment information about the annual number of employees and total hours worked during the calendar year.

- If no recordable injuries or illnesses occurred than you must post the form with zeros in the total line.
- **Form must be displayed in a common area where all notices are usually posted.**
- **A copy must be made available to do those employees who do not have an established location.**
- Copies of the OSHA Forms 300, 300A and 301 are available at: <http://www.osha.gov/recordkeeping/>

[RKforms.html](#)

- Certain employers are partially exempt from keeping OSHA records to find out if you are one go to: <http://www.osha.gov/recordkeeping/ppt1/RK1lex-empttable.html>

**All employers, including those partially exempt must report an incident that results in death or hospitalization of 3 or more employees.**

Please contact any of TRICOR's safety team members with any questions!!



**Tom Osterholz**

Manager

[tosterholz@tricornet.com](mailto:tosterholz@tricornet.com)

**Alyssa Moen**

Safety Consultant

[amoen@tricornet.com](mailto:amoen@tricornet.com)

**Mary Schoettel, ARM**

Safety Consultant

[mschoettel@tricornet.com](mailto:mschoettel@tricornet.com)

## Helpful Reminders

Must save OSHA 300 logs, privacy case list, annual summary and 301 reports for 5 years 1904.33(a)

Must enter each recordable injury/illness on the OSHA 300 log within 7 calendar days 1904.29(b)(3)

Report to OSHA within 8 hours: a work related fatality or 3 or more in-patient hospitalization of employees from a work related incident 1904.39 (a)

## New OSHA Directive: Fall Protection for Residential Builders

*Excerpted from OSHA.gov, Directive No. STD 03-11-002, Effective 12/16/10*

This Instruction cancels OSHA Instruction STD 03-00-001, the Agency's interim enforcement policy on fall protection for specified residential construction activities, and replaces it with new compliance guidance. Under the new policy, employers engaged in residential construction must comply with 29 CFR 1926.501(b)(13).

Under 29 CFR 1926.501(b)(13), workers engaged in residential construction six (6) feet or more above lower levels must be protected by conventional fall protection (i.e., guardrail systems, safety net systems, or personal fall arrest systems) or other fall protection measures allowed elsewhere in 1926.501(b).

However, if an employer can demonstrate that such fall protection is infeasible or presents a greater hazard, it may implement a fall protection plan meeting the re-

quirements of 1926.502(k). The fall protection plan's alternative measures must utilize safe work practices that eliminate or reduce the possibility of a fall. The plan must be written and be site-specific. A written plan developed



for repetitive use for a particular style/model home will be considered site-specific with respect to a particular site only if it fully addresses all issues related to fall protection at that site.

### Significant Changes from the Enhanced Enforcement Program (EEP)

This Instruction cancels OSHA

Instruction STD 03-00-001, dated June 18, 1999, the Agency's interim enforcement policy on fall protection for specified residential construction activities, and replaces it with new compliance guidance.

Employers engaged in residential construction who wish to use alternative fall protection measures must meet the requirements in 29 CFR 1926.501(b)(13) and 1926.502(k).

Fall protection plans used to comply with 29 CFR

1926.501(b)(13) and 1926.502(k) must be written and site-specific.

This instruction interprets "residential construction" for purposes of 29 CFR 1926.501(b)(13) to include two elements: (1) a residence requirement; and (2) a wood frame construction requirement.

To view the directive and for more information, visit OSHA's [Residential Fall Protection](#) page.

## Now that OSHA has rescinded STD 03-00-001, what do residential construction employers have to do to protect employees from fall hazards?

- Employees working six (6) feet or more above lower levels must be protected by conventional fall protection methods listed in 1926.501(b)(13) (i.e., guardrail systems, safety net systems, or personal fall arrest systems) or alternative fall protection measures allowed by other provisions of 29 CFR 1926.501(b) for particular types of work.
- An example of an alternative fall protection measure allowed under 1926.501(b) is the use of warning lines and safety monitoring systems during the performance of roofing work on low-sloped roofs. (4 in 12 pitch or less). (See 1926.501(b)(10)).
- OSHA allows the use of an effective fall restraint system in lieu of a personal fall arrest system. To be effective, a fall restraint system must be rigged to prevent a worker from reaching a fall hazard and falling over the edge. A fall restraint system may consist of a full body harness or body belt that is connected to an anchor point at the center of a roof by a lanyard of a length that will not allow a worker to physically reach the edge of the roof.
- When the employer can demonstrate that it is infeasible or creates a greater hazard to use required fall protection systems, a qualified person must develop a written site-specific fall protection plan in accordance with 1926.502(k) that, among other things, specifies the alternative fall protection methods that will be used to protect workers from falls.

## ***"Don't drop the ball, Resolve to be Ready in 2011"***

***by Darryl Madden, Director, Ready Campaign***

For many, the New Year is a time for making resolutions and goals for the year to come. Spend more time with the family, lose 10 pounds, exercise more and/or reduce debt are resolutions that appear on many of our lists, but the Federal Emergency Management Agency's (FEMA) *Ready Campaign* is asking you to *Resolve to be Ready* by making an emergency preparedness resolution.

Americans who make New Year's resolutions are 11 times more likely to report continued success changing a problem than comparable individuals who have not made a resolution, according to the *Journal of Clinical Psychology*. The *Ready Campaign* would like to make an emergency preparedness resolution easy to keep by providing the tools and resources needed to take the three important steps: get a kit, make a plan and be in-

formed about the different types of emergencies that could occur in your area and their appropriate responses.

Flooding, winter storms, wildfires and earthquakes - no matter what Mother Nature has in store, preparing ahead of time can help to protect against her nastier surprises, speed recovery, and reduce losses - not to mention regrets. By following the *Ready Campaign's* three steps, preparing for an emergency can be a simple and realistic resolution you can keep all year long. You and your family can update or initiate your own emergency preparedness plan, build your own supply kit and be ready for winter storms, spring nor'easters or summer power outages.

Free preparedness resources, such as a Family Emergency Plan template and an Emergency Supply Kit Checklist are

just a click away at [www.Ready.gov](http://www.Ready.gov) or [www.listo.gov](http://www.listo.gov). The *Ready Web* site also has a special section for kids, ages 8-12, (*Ready Kids*) and small- to medium-sized businesses (*Ready Business*).

Emergencies will happen, but taking action now can help us minimize the impact they will have on our lives. Preparedness is contagious. What starts with one family can spread throughout a neighborhood, and every prepared community frees up emergency responders to take care of those who are in dire need. Preparedness is a shared responsibility; everyone is going to have to play a role.

***So Don't Drop  
the Ball,  
Resolve to be  
Ready in 2011***

## **Preparedness Tips for Workplaces and Communities**

### **For Workplaces:**

- Take a critical look at your heating, ventilation and air conditioning system to determine if it is secure or if it could feasibly be upgraded to better filter potential contaminants, and be sure you know how to turn it off if you need to.
- Think about what to do if your employees can't go home.
- Make sure you have appropriate supplies on-hand.

### **For Communities:**

- Find out what kinds of disasters, both natural and man-made, are most likely to occur in your area and how you will be notified. Methods of getting your attention vary from community to community. One common method is to broadcast via emergency radio and TV broadcasts. You might hear a special siren, or get a telephone call, or emergency workers may go door-to-

door. Contact a nearby Citizen Corps Council for help with emergency planning, or work with your local government and emergency management office to help start a Council in your area. Visit [citizencorps.gov](http://citizencorps.gov) to find local Councils in your community.

***For additional tips and information, visit [www.ready.gov](http://www.ready.gov)***

## TRICOR Safety Consulting

1370 North Water Street  
Platteville, WI 53818

Phone: 888- GO TRICOR

Fax: 888-229-6161

E-mail: [tosterholz@tricornet.com](mailto:tosterholz@tricornet.com)

[amoen@tricornet.com](mailto:amoen@tricornet.com)

[mschoettel@tricornet.com](mailto:mschoettel@tricornet.com)

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[tricorinsurance.com](http://tricorinsurance.com)



Our staff of safety specialists has practical "field safety" experience in manufacturing and/or construction operations. We bring a reality of what does work and, what does not to every situation.

As consultants, we think strategically to accomplish safety goals within the big picture of your business. We speak your language and understand the performance and budget constraints that affect your decision making. As specialists in our field, we'll think through your safety and loss control issues with you.

*Tom, Alyssa, and Mary*



## NEP revised to protect workers from exposure to diacetyl, diacetyl substitutes

To minimize or eliminate worker exposure to the hazards associated with microwave popcorn manufacturing, OSHA recently revised its National Emphasis Program (NEP) to include 2,3-pentanedione, 2,3-hexanedione, 2,3-heptanedione and all other related diacetyl substitutes that share the same alpha-diketone structure, as well as substitutes diacetyl trimer and acetoin. Effective January 18, 2011, this NEP will also provide guidance on targeting, inspection procedures, engineering controls, work practice controls, and compliance assistance.

In January 2006, the National Institute for Occupational Safety and Health (NIOSH) released a Health Hazard Evaluation Report on their investigation at a microwave popcorn production facility. Several former workers

from this facility were diagnosed with bronchiolitis obliterans, a severe obstructive lung disease. Following this investigation and the evaluation of lung function tests and air sampling results, NIOSH determined that inhalation exposure to butter-flavoring chemicals such as diacetyl present a risk for occupational lung disease. In 2010, a NIOSH study indicated that 2,3-pentanedione, a diacetyl substitute, produces similar health effects as diacetyl in rats. Similarly, a 2010 National Institute of Environmental Health Sciences (NIEHS) study also demonstrated effects in rats and mice from exposure to 2,3-pentanedione.

"It is alarming that workers continue to be at risk of dying from exposure to diacetyl and diacetyl substitutes," said Assistant Secretary of Labor for Occupational

Safety and Health Dr. David Michaels. "Illnesses and death from these chemicals are preventable and this revised directive will help ensure that employers use necessary measures to protect workers from this hazard."

Currently, OSHA has permissible exposure limits (PELs) for some diacetyl substitutes, however most flavorings do not have PELs. Additionally, microwave popcorn manufacturing facilities are subject to other applicable OSHA mandatory standards including Respiratory Protection and Hazard Communication.

To read the revised National Emphasis Program – Microwave Popcorn Processing Plants, click [here](#).