Annual Meeting and Safety Culture Training Session, January 29

The purpose of an annual meeting is to report to an organization’s members (that’s you!), to elect members of the Board of Directors and to conduct other membership business. Annual meetings can be formal, long and boring. But not ours! We have lined up a tremendous workshop to kick off the day:

**9:00 a.m. - 11:45 p.m. Workshop: Leading a True Safety Culture**

This session will be presented by one of our finest speakers, Ronn Lehmann. Ronn’s presentation combines an entertaining style with practical, engaging information to help organizations obtain results!

**Noon - 1:00 p.m. Annual Meeting/Luncheon**

Take the opportunity to get a glimpse of what we’ve been up to on your behalf, and chat with other members, our Board of Directors and our staff at the Annual Meeting luncheon. We’ll be done promptly at 1:00 p.m.

Join us at the Ramkota Hotel, 3200 W. Maple Street, Sioux Falls. Space limits us to only one hundred guests so please sign up as soon as possible. Member cost for the training session and lunch is $45 (plus 6% tax) per person ($20 for the annual meeting/luncheon only). Please respond by January 23 so we can be sure we have food for you: Call us at 361-7785/800-952-5539. We may even rustle up a door prize or two!

From all of us at your South Dakota Safety Council — our best wishes for a safe, secure and very prosperous 2014!

New Year – New Training Opportunities

The New Year brings new training opportunities! See highlights below and find details on pages 6-7.

- **OSHA 30-hour General Industry Training Course**, February 5-6, 11-12
- **OSHA 10-hour Construction Safety Course for Building Contractors**, January 23-24, Sioux Falls and Rapid City
- **Part 46 MSHA Annual Refresher**, January 31, Pierre; February 5, Rapid City; February 18, Aberdeen; March 12, Sioux Falls
- **Fall Protection Competent Person (half-day)/Scaffolding Competent Person (half-day), or combined full-day**, February 5, Rapid City; February 19, Aberdeen; March 19, Pierre
- **Defensive Driving Course, Basic, 4-hour**, February 11
- **OSHA 30-Hour Occupational Safety and Health Standards for the Construction Industry**, February 17-20, Aberdeen; March 17-20, Pierre
- **Aerial Work Platform (AWP) Operator Training**, February 26
- **First Aid/CPR/AED Employee Training, Hands-on**, March 12
- **Bloodborne Pathogen Training**, March 20
- **First Aid/CPR/AED Instructor Development Course**, March 26
Moving Beyond OSHA Recordkeeping
By Steve Gutmann, CIH, CPE; President, S. H. Gutmann Consulting, LLC

As we begin 2014, many of us will be sharing the OSHA 300 and 300A recordkeeping forms with employees. OSHA considers these summaries of workplace injuries and illnesses to be important for “discovering workplace safety and health problems and for tracking progress in solving those problems” (www.osha.gov/recordkeeping/detailedfaq.html). The data are most commonly used in two ways. The first involves calculating incidence and severity rates so progress can be compared year-to-year or to other companies. The second way is to highlight areas where incidents have taken place so more in-depth analysis can be done. The benefit is in finding out the causes of the incidents and fixing them before more occur.

This can be very helpful for many organizations. And the simplification of the recordkeeping rules by OSHA in 2001 helped a lot to improve the accuracy and usefulness of the OSHA recordkeeping data.

However, relying solely on the OSHA logs for this analysis has been criticized for two main reasons. First, using this data is considered to be “reactive.” That is, we’re reacting to incidents after they have occurred. Many consider this to be a great view of the past, but not necessarily of the present or future. Second, the information collected is often not sensitive enough to tell us much or show clear patterns or risks. As a result, people may become frustrated that their limited resources may not be solving the underlying problems. So, how does one become more “proactive?” And, how can we use our resources more effectively for the real sources of incidents?

Different organizations have successfully approached this issue using different methods and metrics. But the common theme has been to use more sensitive information to capture risks before incidents take place. One of the key aspects is to work more closely with employees. There are three aspects to making this successful. First, employees need to feel free to report issues early without a perception they will be penalized for doing so.

Second, management needs to have procedures in place to encourage these reports, to process them in a timely way and to get back to the employee to show progress. Even if the issue needs more research or evaluation, getting word back to the employee is important to show responsiveness. Third, employees need to work with management on identifying and implementing fixes both in the near term and long term.

Here are some examples of proactive reporting:
• First-aid cases (e.g., a minor cut, bruise, or an ache or pain)
• Close calls (sometimes called “near-misses”)
• Employee complaints or comments
• A formal process for reporting “potential hazards”
• Safety observation data
• Employee feedback and/or data from Lean, Six Sigma or quality events
• Results of audits, inspections or workplace reviews
• Creating/updating JSAs or PPE assessments and identifying issues for follow-up
• Employee input early in design projects or equipment purchases

The potential value of this approach can be seen in a number of ways. First, it can result in reporting of issues before they become OSHA recordable cases. The issues are usually less severe, easier to treat and treatment is more effective. Second, evaluating issues reported early can uncover production problems and inefficiencies. Correcting them could lead to improved productivity, better product quality and reduced production costs.

(continued on next page)
Moving Beyond OSHA Recordkeeping, continued

So, as you head into 2014, remember the value of effective OSHA injury and illness recordkeeping. At the same time, a focus on proactive measures can improve effectiveness even more for finding and improving workplace issues.

Does your organization feel “employees are our most important resource?” How can you get them involved? Can you do it so they can feel they are helping to improve performance and competitiveness?

Steve is president of S. H. Gutmann Consulting, LLC, providing services in the areas of ergonomics, industrial hygiene and safety and health management system performance. Steve is a Certified Industrial Hygienist (CIH) and Certified Professional Ergonomist (CPE), and has over 30 years’ experience in the field.

Safety News Round-up

NIOSH Seeks Comment on Heat Standard, Carcinogen Policy, Manual of Analytic Methods The National Institute for Occupational Safety & Health (NIOSH) is seeking comment on proposed criteria for a recommended standard on exposure to heat and hot environments. NIOSH will also hold a related public meeting on February 13, 2014. Find details in the December 27 Federal Register.

NIOSH is also seeking public comment on a significant update to its carcinogen policy, which was first issued in 1978. Comments must be received by February 15.

NIOSH is planning a 5th edition of the Manual of Analytic Methods (NMAM), which will be published in a searchable electronic format. The NMAM is a standard resource that provides methods for evaluating worker exposure to contaminants in the workplace. NIOSH is seeking input through a survey and is also looking for labs willing to help evaluate methods that may be included in it.

Other News from NIOSH A new resource has been added to the NIOSH “Prevention through Design” program. Preventing Falls Through the Design of Roof Parapets contains information to help reduce risks from falls during construction, operation, maintenance, and demolition of buildings.

NFPA Launches Electrical Safety Certification Program The National Fire Protection Association (NFPA) has announced a new Certified Electrical Safety Compliance Professional (CESCP) certification program, created to encourage electrical safety within the industry. The program is based on NFPA 70E, Standard for Electrical Safety in the Workplace, 2012.

Study Compares Healthcare Worker Injuries by Age A new study examines the relationships between age and occupational injury risks among healthcare workers, finding slip and fall injuries to be five times higher among older workers than younger ones.

Annual Workplace Injury/Illness Survey Released The national rate of non-fatal workplace injuries and illnesses reported for 2012 continues the pattern of statistically significant declines that, with the exception of 2011, occurred annually for the last decade, according to estimates from the Survey of Occupational Injuries and Illnesses just released by the U.S. Bureau of Labor Statistics.

Cross-Generation Motivation and Safety A new article in OHS Online suggests that instead of focusing on differences between older and younger workers, bringing them together on common safety ground can improve engagement, motivation, and safety.

OHS Online: Cross-Generation Motivation and Safety
News from Federal OSHA

White House regulatory office releases final rule covering electrical power safety. Bloomberg BNA reports that a review of the draft final rule to protect workers constructing and repairing high-voltage power lines has been completed by the White House Office of Information and Regulatory Affairs. The next step will be OSHA’s publication of the final rule in the Federal Register; no date for that yet.

Comment period extended on injury tracking rule. OSHA has released a Federal Register Notice extending the comment period on the proposed injury/illness tracking rule by 30 days to March 8, 2014. The extension comes in response to a request from the National Association of Home Builders. OSHA will hold an informal meeting on the proposed rule, January 9 in Washington, D.C. OSHA is proposing to add requirements for the electronic submission of injury and illness information employers are already required to keep under existing standards, Part 1904. Business groups say they are likely to oppose the plan, claiming that raw injury data can be misconstrued or may disclose sensitive information that may be misused.

OSHA renews partnership with electrical industry. OSHA has renewed a national partnership with employers, workers and professional associations representing about 80 percent of the electrical transmission and distribution industry. The partnership has developed best practices to reduce injuries, illnesses and deaths among linesman and other electrical workers.

Silica rulemaking fact sheets in English, Spanish. Five new fact sheets on OSHA’s proposed rule for respirable silica are now available in both English and Spanish, including information for the construction industry, general industry and maritime, and small businesses. Go to the OSHA Publications Page and scroll down to the titles beginning with OSHA’s Proposed Crystalline Silica Rule.

Online whistleblower form. Whistleblowers can now file retaliation complaints online with federal OSHA. Detailed information on employee whistleblower rights, including fact sheets and instructions on how to submit the form in hard-copy format, is available on the OSHA website.

Public comment on chemical safety standards. Federal OSHA has published a request for public comment on potential revisions to its Process Safety Management (PSM) standard and related standards (Explosives and Blasting Agents, Flammable Liquids and Spray Finishing), as well as potential changes to PSM enforcement policies.

Mechanical power presses standard. OSHA has issued a proposed rule that updates and streamlines the standards for the use of mechanical power presses, specifically around record requirements. Comments must be submitted by February 24, 2014.
Revisiting the Hierarchy of Controls

By Michael Wood, Administrator, Oregon OSHA

In recent weeks, I have had several conversations that ended up hinging on the hierarchy of controls – in most cases, the issue was that the hierarchy was being overlooked in the discussion and controls (such as personal protective equipment) that relied upon a high level of worker “compliance” were being incorrectly treated as controls that largely eliminated the hazards in question.

I have written before that I believe the essence of the hierarchy of controls is less focused on a discussion of “engineering controls” versus “administrative controls” versus “work practice controls” and more focused on a simple set of principles:

• First, a control is preferred if it minimizes the need for the worker’s active participation to ensure its effectiveness.

For example, the reason that ventilation is superior to respirator use is not because respirators, if properly used, are inherently less effective. It is because they are more vulnerable to improper use by individual workers. In the same way, a guardrail system is superior to individual fall restraint systems not because the fall restraint systems do not work, but because the individual workers do not need to “hook up” the guardrail systems in order to make them work properly.

Simply put, no hazard can be considered to be fully addressed as long as there is a possibility that the control can fail due to “worker error” (whether the result of poor training, poor work practices, contradictory expectations, inattention, or anything else).

• Second, a control is preferred if, to the degree it does rely upon active participation on the part of the worker, the worker’s actions reflect natural and largely automatic actions.

This principle is at play in having dials and valves turn the same direction and not using red for “on” and green for “off” on controls (you’d be surprised how often these simple approaches are overlooked for one reason or another). To take an extreme example, there is really no mechanical reason why turning the steering wheel of an automobile to the right also turns the car in that direction. But, if you reverse it, no amount of “worker training” is going to overcome the worker’s natural and conditioned inclinations. I haven’t run across a worksite that goes to that extreme – but I’ve encountered a few that have come close to it.

• Third, a control is preferred if it cannot be easily defeated without active and conscious participation on the part of the worker being protected.

This is the principle at play in the use of interlocks and other “passive” guarding systems. It also is at play in covering a fixed ladder that should not normally be used with a screen making it impossible to climb rather than relying upon a “no unauthorized entry” sign. The sign will be completely effective if it is followed. But, clearly, the screen over the ladder is a superior control – not because it works better when properly employed, but because it is much less likely to be actively subverted (and, therefore, much more likely to be properly employed).

• Finally, a control is preferred if it eliminates or at least minimizes injury to the employee if a failure does, in fact, occur.

Substituting a less hazardous chemical for a more hazardous one will not eliminate the possibility of a spill. But it is clearly a good idea that reduces the inherent risk of the activity in question, because it reduces the consequences, even though it does not reduce the likelihood of a problem occurring.

As we design our workplace activities, these principles – especially if designed into the basic work processes – can reduce the need for enforcement and progressive discipline, as well as the need to focus excessive attention on shifting worker behavior. They can make our workplaces more intrinsically safe – and that’s where we are likely to see the greatest benefits in the long run.

Upcoming Training Highlights

January 23-24, Sioux Falls and Rapid City  OSHA 10-hour Construction Safety Course for Building Contractors  Facilitators identify safety and health principles that help you meet OSHA requirements, mitigate risk and prevent injury. The class focuses on the areas of construction most common to vertical work. Members: $130 / Non-members: $195.

January 31, Pierre; February 5, Rapid City; February 18, Aberdeen; March 12, Sioux Falls  Part 46 MSHA Annual Refresher  MSHA training is required for all employees and independent contractors working in or around mining operations that are: engaged in mining operations, including developing, drilling, blasting, extracting, milling, crushing, screening or sizing materials, or hauling materials within the mine; a maintenance or service worker, working on mining equipment for frequent (a pattern of recurring exposure) or extended periods (more than five consecutive work days); or a construction worker who is exposed to hazards of mining operations for frequent or extended periods. Members: $60 / Non-members: $90.

February 5-6, 11-12  OSHA 30-hour General Industry Training Course  The 30-hour course is a more in-depth study of OSHA regulations and required programs. More coverage is devoted to each of the topics of the 10-hour course, as well as additional topics including:
- OSHA recordkeeping
- Industrial hygiene
- Welding, cutting and brazing
- Flammable and combustible liquids
- Material handling – forklifts, overhead cranes
- Safety and health programs

February 5, Rapid City; February 19, Aberdeen; March 19, Pierre  Fall Protection Competent Person (half-day)/ Scaffolding Competent Person (half-day), or combined full-day. Members: $70 half-day; $105 full-day / Non-members: $105 half-day; $210 full-day.

February 11  Defensive Driving Course, Basic, 4-hour  DDC-4 is a fast-paced, four-hour driver improvement program that also makes an ideal refresher course. It's designed for employees who have already been through the eight-hour course, employees who have had traffic violations, or those who drive a company vehicle or their own vehicle on company time. Members: $40/person / Non-members: $50/person.

February 17-20, Aberdeen; March 17-20, Pierre  OSHA 30-Hour Occupational Safety and Health Standards for the Construction Industry  Provides an in-depth review of hazard awareness. Emphasis is placed on areas in construction that most commonly result in injury or damage. The OSHA 30-hour covers all topics covered in the OSHA 10-hour but to a greater depth. Members: $300 / Non-members: $450.

February 26  Aerial Work Platform (AWP) Operator Training  This course educates attendees in the safe operation of scissor lifts, boom lifts and articulating lifts. It covers the principles and hazards associated with operating an AWP as well as the unique characteristics of AWPs that operators will commonly operate. Members: $50 / Non-members: $75.
Upcoming Training Highlights, continued

March 12  **First Aid/CPR/AED Employee Training, Hands-on** Learn the skills to maintain the life of a victim until emergency medical personnel arrive. Upon course completion, participants receive National Safety Council First Aid/CPR/AED certificates. Members: $70/person / Non-members: $80/person.

March 20  **Bloodborne Pathogen Training**  OSHA’s Bloodborne Pathogens Standard (29 CFR 1910.1030) requires employers to safeguard employees who face potential occupational exposure to blood and other potentially infectious materials. This revised course covers an introduction to bloodborne pathogens, including hepatitis viruses and HIV; preventing infection from bloodborne pathogens; airborne pathogens, including tuberculosis and influenza. Updated information on the Needle Stick Safety and Prevention Act, TB testing and an expanded section on recordkeeping and exposure control plans also included. Members: $50 / Non-members: $65

March 26  **First Aid/CPR/AED Instructor Development Course**  This revised two day instructor development course is designed to prepare you to teach First Aid CPR/AED using the latest methods and materials from the National Safety Council’s Emergency Care Program. Members: $350/person / Non-members: $450/person.

For details on all courses, see [www.southdakotasafetycouncil.org/courses/c-home.cfm](http://www.southdakotasafetycouncil.org/courses/c-home.cfm). Questions? Contact Gary at gmiles@southdakotasafetycouncil.org. To register for any of these classes, please call us at 605-361-7785/800-952-5539.

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**Are You Prepared for Winter Weather?**

Don’t wait until it’s too late . . . now is the perfect time to take stock of your winter preparedness items. Invest in safety for you and your loved ones — *it could save a life!*

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Want to make **this kit** available to your employees to purchase on their own? Ask about how you can coordinate an **Employee Purchase Program** at your facility to save on shipping costs. For more information, contact Diane Hall at 605-361-7785 / 800-952-5539 or e-mail her at dhall@southdakotasafetycouncil.org.
Family Safety Training: Off-the-Job Protection for Employees

A growing number of businesses consider off-the-job/family safety critical to good management of health care costs, productivity and overall worker well-being. Encourage employees to think about the benefits of family safety training such as emergency preparedness, driver refresher training and water safety lessons for themselves and family members to help prevent unnecessary trips to the emergency room.

The South Dakota Safety Council and National Safety Council suggest several steps, including the following:

- **Become trained in first aid and CPR with AED.** Research shows 75 percent of out-of-hospital cardiac arrests occur at home and 25 percent of hospital emergency room visits could be eliminated if someone knew first aid.
- **Get “hands on” experience in using a fire extinguisher** and learn how to put out small fires in your home.
- **Refresh your driving skills.** A defensive driving course, either online or in a classroom, provides information on how to prevent collisions, recognize potential hazards and drive defensively in unpredictable conditions.
- **For teens,** learn about what puts teen drivers at greater risk for motor vehicle injury and death. The Alive@25 program can help teen drivers recognize risky situations and how to respond.
- **Learn to swim.**

Find more outdoor safety information from the South Dakota Department of Game, Fish and Parks.