

ADOSH ADVOCATE

Improving
workplace
safety &
health



<http://www.ica.state.az.us>

Volume 4 - 2012

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Shifting Sands...

A Farewell to Bill Wright



Bill Wright, my Assistant Director in Phoenix for the past several years, recently announced his retirement, effective September 5, 2012.

Bill started with ADOSH in December 2003 as a safety compliance officer. He assumed the role of assistant director in 2005. In that role, Bill had general oversight responsibility for the elevator and boiler safety sections, as well as the ADOSH compliance sections.

Bill has been a great asset to ADOSH and the employer community. His assistance and insight will be missed, but all of us here at ADOSH want to wish him a very safe, healthy and happy retirement.

Best wishes, Bill!

-Darin Perkins, ADOSH Director

*May the road rise up to meet you, may
the wind be ever at your back. May the
sun shine warm upon your face and the
rain fall softly on your fields. And
until we meet again, may God hold you
in the hollow of his hand.*

~ Irish Blessing

New Safety Supervisor

When Bill Cooper moved to the Consultation Section at ADOSH he left some mighty big shoes to fill and we finally found just the right fit! ADOSH welcomes Marshall Krotenberg as the new Safety Compliance Supervisor.

Marshall is no stranger to the Arizona safety community and you may have met him during his first stretch with ADOSH in 1992-1995. When he returned to work with ADOSH in 2010, many things had

changed, not the least of which was the use of computers for writing our reports!



Marshall is a Tucson native and attended the University of Arizona, earning his BS in Soil and Water Science and his Masters Degree in Toxicology. Additionally he has added the titles of Certified Industrial Hygienist and Certified Safety Professional to his years of experience in the field of safety and health. He has worked for the City of Tucson, TRW and Rimkus Consultation Group.

Safety is only one of Marshall's passions. He has many interests and hobbies including golf, fitness, wood working and brewing beer! His greatest passion is reserved for his family, specifically his wife of 18 years, Patricia, and two teenage children who are active in sports and life.

Marshall believes in leading by example and plans on building a fun and challenging work environment for his team.

ADOSH ADVOCATE

Published quarterly by the Arizona Division of Occupational Safety and Health for employers and employees of Arizona. The information in this newsletter is provided as a service and should not be considered as the exclusive source of the requirements of the standards. This document is in the public domain & we encourage re-printing. Comments and suggestions are welcome.

Arizona Division of Occupational Safety and Health
800 West Washington Street 2675 East Broadway Road
Phoenix, AZ. 85007 Tucson, AZ. 85716
(602) 542-5795 (520) 628-5478
Toll Free: 855-268-5251
Darin Perkins, Director

Phoenix Summit Photo Summary

The Phoenix Regional Safety Summit held at the Wigwam Resort on August 7-8, 2012, hosted vendors representing businesses from mobile drug testing to PPE to burn treatments who came to share and support.

Our keynote speakers were outstanding! On Tuesday morning, Chris Perez from the 377 Group, addressed the group



regarding violence in the workplace. On Wednesday, Dr. Mark Fischione, Chief Medical Examiner for Maricopa County, spoke to an even larger group regarding workplace fatalities and pandemic influenza response plans. At the audience's request, Dr. Fischione continued speaking into the lunch hour.

An OSHA 10-hour class was presented to a



full group of attendees. In addition, there were a myriad of other classes presented by folks like Connie Sasser, RN with the Grossman Burn Center, and Stephanie McDougall with the Arizona Department of Public Health Services.

Stephanie Steinberger with SCF-AZ presented a class on "Return to Work" and Angie Rolnik from Berry Plastics shared her "On-line Safety Resources" class. Two demonstrations, one on Fall Protection Equipment by Mike Maloney with Carson



Sales, and another by Carl Moore with the APS "weenie wagon" also added much to the event.

ADOSH wishes to extend our gratitude to all who helped put together a wonderful Summit! We look forward to 2013! Note: The Tucson Safety Summit has been rescheduled to April 2013.



Above, Guardian Fall Protection displays their stuff! Below, Dr. Mark Fischione instructs the attendees regarding workplace fatalities and pandemic flu. Above left, Chris Perez instructs attendees.



Above: Bill Cooper teaches the 10-Hour class. Below, left and right, The ADOSH display and vendors display some of their products and information



Flagstaff Summit Photo Summary

Coconino Community College co-hosted our Summit in Flagstaff on June 13-14, 2012. The College opened it's doors, literally and figuratively for approximately 175 Summit attendees!



Greeting all at the Registration Desk are ADOSH Admin Assistants Rosemary Montanez and Sylvia Sinohui.



ADOSH Trainer Joe Ornelas instructing the OSHA 10-Hour Class comprised of 40 students.



ADOSH Consultation Supervisor Babak Emami instructs management about Employer Rights and Responsibilities and Consultation Services.

Our heartfelt thanks to Margaret Penado, City of Flagstaff and Alex Wright, CCC for all of the hard work to make the Summit a success. We also want to thank Mike Griffiths, The Guidance Clinic; Detective Matt Schmidt, Flagstaff PD; Grossman Burn Center; Carl Moore, APS Demonsration; and Mike Maloney, Carson Sales Co. for the Fall Protection Demo.

"It's what you learn after you know it all that counts."
~ Harry S Truman



A Thousand Words



The "Inbox"



We regularly receive questions and comments via e-mail. Following is a selection of some recently received at ADOSH's public e-mail box: adosh.comments@dol.gov

Q: If an employee participates in an employer sponsored blood drive allowed during working hours, and experiences an allergic reaction rash afterwards, is this a recordable illness to be entered on our OSHA 300 Log?

A: Since the Blood Drive is a voluntary activity it does not fall under OSHA Recordkeeping and does not need to be recorded. Here is some clarification from the Recordkeeping Handbook:

Paragraph 1904.5(b)(2) (iii) Injuries and illnesses will not be considered work-related if they

result solely from voluntary participation in a wellness program or in a medical, fitness, or recreational activity such as blood donation, physical, flu shot, exercise classes, racquetball, or baseball.

The key words here are "solely" and "voluntary." The work environment cannot have contributed to the injury or illness in any way for this exception to apply, and participation in the wellness, fitness or recreational activities must be voluntary and not a condition of employment.

This exception allows the employer to exclude cases that are related to personal matters of exercise, recreation, medical examinations or participation in blood donation programs when they are voluntary and are not being undertaken as a condition of work. For example, if a clerical worker was injured while performing aerobics in the company gymnasium during his or her lunch hour, the case would not be work-related. On the other hand, if an employee who was assigned to manage the gymnasium was injured while teaching an aerobics class, the injury would be work-related because the employee was working at the time of the injury and the activity was not voluntary.

Similarly, if an employee suffered a severe reaction to a flu shot that was administered as part of a voluntary inoculation program, the case would not be considered work-related; however, if an employee suffered a reaction to medications administered to enable the employee to travel overseas on business, or the employee had an illness reaction to a medication administered to treat a work-related injury, the case would be considered work-related.

It may be easier to determine workplace relatedness if we consider the reason records are kept...to determine the hazardness (yes...that is a word!) of the industry, and if an illness or injury is not related to the industry, or work being performed, to report it would skew the data. Keeping that purpose in mind, a blood drive does not reflect on the hazards of the industry and reactions to the blood drive would be secondary to that activity. If the initial activity was not associated with the workplace then the secondary reaction could not be deemed workplace related. RECORDKEEPING CLASSES and WEBINAR THIS QUARTER!

- 1) An employee harvesting cantaloupes died as a result of a heart attack.
- 2) An employee was crushed between an excavator arm and the body of the excavator.
- 3) An employee died of burns sustained from a fire, resulting from welding on a fuel tank.
- 4) An employee died on a construction site, possibly as a result of heat stroke.
- 5) The owner of an automotive repair facility was crushed by the arm of a tow truck.

**Occupational
Fatalities
Investigated
by ADOSH
April - June
2012**

ADOSH Education and Training Calendar

Registration for each class begins 30 days prior to the date of the class. Most classes are **free of charge** but are subject to change or cancellation without notice. Some classes or seminars listed are not exclusively sponsored by ADOSH and *may* carry a nominal fee to cover the cost of course materials, space rental, etc. **NOTE: The phone number or web address listed for each class is the number participants need to call for registration purposes and may or may not be a direct number to ADOSH or the trainer. Registration Problems? Please call 602-542-1769.**

Date	Time	Class	Address	City	Instructor	Phone	Host
October 2	9 AM - 12 PM	Gen Industry Hazard Awareness	921 Thatcher Blvd.	Safford	Ornelas	928-428-3250	Clel L. Flake
October 3	9 AM - 12 PM	OSHA 300 Recordkeeping	2675 E Broadway Blvd.	Tucson	Ornelas	520-628-5478	ADOSH
October 4	9 AM - 12 PM	Workplace Violence Prevention	2675 E. Broadway Blvd.	Tucson	Ornelas	520-628-5478	ADOSH
October 10	9 AM - 12 PM	Forklift Train-the-Trainer	2675 E Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
October 11	9 AM - 12 PM	Bloodborne Pathogens (SPANISH)	800 W Washington St	Phoenix	Lopez	602-542-1769	Rosemary Montanez
October 11	9 AM - 12 PM	Small Hand Tool Safety (SPANISH)	1090 W Union St	San Luis	Ornelas	928-341-8552	Andrea Catania
October 11	1 PM - 4 PM	Small Hand Tool Safety (English)	1090 W Union St	San Luis	Ornelas	928-341-8552	Andrea Catania
October 11	8 AM - 12 PM	Forklift Train-the-Trainer	3030 N 3rd St.	Phoenix	Mandeville	602-5421769	www.scfaz.com
October 16	9 AM - 11 AM	Machine Guarding	2675 E Broadway Blvd.	Tucson	Ornelas	520-628-5478	ADOSH
October 17	9 AM - 12 PM	Excavation Safety	2675 E Broadway Blvd.	Tucson	Atencio	520-628-5478	ADOSH
October 17	9 AM - 12 PM	Forklift Train-the-Trainer	500 S Central (Conference Rm B)	Florence	Ornelas	520-866-7920	Ana Escobel
October 23	9 AM - 12 PM	Excavation Safety (SPANISH)	800 W Washington St	Phoenix	Samaniego	602-542-1769	Rosemary Montanez
October 23	9 AM - 12 PM	Office Safety	2675 E Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
October 24	9 AM - 12 PM	Excavation Safety	2951 S 21st Dr.	Yuma	Ornelas	928-373-1138	Diane Robinson
October 24	1 PM - 4 PM	Flammable Liquids/Fire Safety	2951 S 21st Dr.	Yuma	Ornelas	928-373-1138	Diane Robinson
October 31	9 AM - 12 PM	Hazard Communication/GHS (SPANISH)	800 W Washington St	Phoenix	Ornelas/Samaniego	602-542-1769	Rosemary Montanez
November 1	9 AM - 12 PM	Hazard Communication/GHS	800 W Washington St.	Phoenix	Weberman	602-542-1769	Rosemary Montanez
November 6	9 AM - 12 PM	Office Safety	2675 E Broadway Blvd.	Tucson	Ornelas	520-628-5478	ADOSH
November 7	9 AM - 12 PM	Heavy Equipment Safety (SPANISH)	1450 N Hohokum Dr.	Nogales	Ornelas	520-988-0135	Alejandro Barcenas
November 8	9 AM - 12 PM	Workplace Violence Prevention	2675 E Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
November 13	9 AM - 12 PM	Workplace Violence Prevention	800 W Washington St	Phoenix	Mandeville	602-542-1769	Rosemary Montanez
November 14	9 AM - 12 PM	Machine Guarding	2675 E. Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
November 14	9 AM - 12 PM	Forklift Train-the-Trainer	3030 N 3rd St	Phoenix	Cooper	602-542-1769	www.scfaz.com

ADOSH Education and Training Calendar (Continued)

Date	Time	Class	Address	City	Instructor	Phone	Host
November 20	9 AM - 12 PM	Hazard Communication/GHS	2675 E Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
November 27	9 AM - 12 PM	Bloodborne Pathogens	2675 E Broadway Blvd	Tucson	Ornelas	520-628-5478	ADOSH
November 28	9 AM - 12PM	Welding/Compressed Gas Safety	2951 S 21st Dr	Yuma	Ornelas	928-373-1138	Diane Robinson
November 28	1 PM-4 PM	Machine Guarding	2951 S 21st Dr.	Yuma	Ornelas	928-373-1138	Diane Robinson
November 29	9 AM - 12 PM	Recordkeeping OSHA 300	LIVE WEBINAR	Phoenix	Atencio	602-542-1769	Rosemary Montanez
November 30	8 AM - 11 AM	Residential Fall Protection	800 W Washington St	Phoenix	Cooper	602-542-1769	Rosemary Montanez
December 4	9 AM - 12 PM	Recordkeeping Workshop (see article in this issue)	3000 N 4th St (CCC)	Flagstaff	Mandeville	602-542-1769	Rosemary Montanez
December 5	9 AM - 12 PM	Cranes in Construction	800 W Washington St.	Phoenix	Cooper	602-542-1769	Rosemary Montanez
December 6	9 AM - 12 PM	Office Safety	1070 W Calle De Las Casitias	Green Valley	Ornelas	520-631-1867	Mercedes Mendoza
December 18	9 AM - 12 PM	Recordkeeping Workshop (see article in this issue)	3030 N 3rd St (SCF Building)	Phoenix	Mandeville	602-542-1769	Rosemary Montanez
December 20	9 AM - 12 PM	Recordkeeping Workshop (see article in this issue)	800 W Washington St	Phoenix	Mandeville	602-542-1769	Rosemary Montanez

NOTES: Please register for training classes hosted by SCF at their website: www.scfaz.com. Look for the safety seminars folder. If there are not enough people (10) for the class, or if the instructor is ill, the class will be cancelled. Please be sure we have contact information for you and check with the contact number above to ensure that the class will be held as scheduled.

Trainer's Corner

by Jenny Mandeville, ADOSH Trainer



We have added something new for Spanish Language training! So **SLOW DOWN** and take a look!



Paul Meier

This quarter we have scheduled in some Spanish language classes in the Phoenix area, offered by the ADOSH Consultation Staff in the following subjects/trainers:

Bloodborne Pathogens - Luis Lopez
October 10, 2012

Excavation Safety - Toby Samaniego
October 23, 2012

Hazard Communication- Joe Ornelas
October 31, 2012

OTHER LOCATIONS IN ARIZONA:

Small Hand Tool Safety Awareness in San Luis with Joe Ornelas: October 11, 2012

Heavy Equipment Safety Awareness in the City of Nogales with Joe Ornelas: November 7, 2012

Check our training schedule in this edition of the Advocate for times and locations and registration information.

SAFETY TRAINING IN SPANISH:

- www.osha.gov/dcsp/compliance_assistance/index_hispanic.html
- <http://www.orosha.org/educate/peso.html>
- http://www.osha.gov/dte/grant_materials/material_listing_language.html
- <http://www.consultationconnection.org/oti/>



Recordkeeping Workshops

This quarter we are offering a recordkeeping workshop to help you finalize your 300 forms and fill out your 300A Form to post in 2013. In addition, you will learn how to calculate your DART (Days Away, Restricted Transferred) and TRC (Total Recordable Cases) and compare those rates to the national statistics for your industry.

We will offer a WEBINAR OSHA 300 BASICS class on November 29th for those who need to know the basic information for filling in the OSHA 300 Log. The Workshops on December 18 and 20 in Phoenix will then take the information you entered and finalize the Log for the year. We have given you two dates to choose from for the Workshop, one in the morning and one in the afternoon. Both classes will contain the same information.

In addition to the calculations we will look for injury and illness trends to help you identify safety areas that might need more attention. We will suggest some ideas to help you with training and activities that will help your employees experience a safer workplace.

The class sizes will be limited, as this is a workshop with hands-on exercises. You will need to **bring the following items with you:**

- Your company's 2012 OSHA 300 Log
- Copy of the 101 form for each entry
- Total number of hours worked (projected through Dec. 31)
- Average number of employees for the year (full and part-time)
- Calculator if you need it (I do!)

Call today to reserve your place at the Workshop!



Recordkeeping Basics WEBINAR!
November 29th
Be prepared for the OSHA 300 Workshops in Phoenix and Flagstaff in December!
Call Rosemary at 602-542-1769 or email to Montanez.rosemary@dol.gov to get details and instructions emailed to you.

2012-2013 Influenza Vaccine

On February 23, 2012 the World Health Organization recommended that the Northern Hemisphere's 2012-2013 seasonal influenza vaccine be made from three different viruses: the H1N1 virus, the H3N2 virus the B virus.

Influenza is a serious disease that can lead to hospitalization and sometimes even death. Every flu season is different, and influenza infection can affect people differently.



Even healthy people can get very sick from the flu and spread it to others. The "seasonal flu season" in the United States can begin as early as

October and last as late as May.

CDC recommends that people get vaccinated against influenza as soon as flu season vaccine becomes available in their community. Influenza seasons are unpredictable, and can begin as early as October. It takes about two weeks after vaccination for antibodies to develop in the body and provide protection against the flu.

"When workers are ill, the economy is sick. Sick workers may be good for Kimberly-Clark (tissues), Procter & Gamble (NyQuil), along with CBS (Oprah), but they also hurt productivity. The overall economic impact of the flu in the U.S. is \$87.1 billion each year. According to the Center for Prevention and Health Services, the flu indirectly costs employers about \$76.7 million, on average, in missed work and other indirect costs like health-care."(Reuters -Lauren Young)According to the Centers for Disease Control and Prevention (CDC), on average 13 percent of the U.S. population gets the flu every year, with active flu seasons seeing closer to 20 percent, or more than 62 million Americans.

Get the message out about flu season:

Three free employee training modules on flu prevention have been shared with ADOSH and the public and can be found at www.actasafety.com.

Asleep at Work

(Complied from selected NIOSH, CDC, National Sleep Foundation publications)

How much sleep is enough sleep? A growing number of American workers are not getting enough sleep. Research shows an increase from 24% in the 1980s to 30% in the 2000s in the percentage of American civilian workers reporting 6 or fewer hours of sleep per day—a level considered by sleep experts to be too short (Luckhaupt, Tak, & Calvert 2009).

We know that sleep is important. The need for sleep is biologically similar to the need to



eat and drink, and it is critical for maintaining life and health and for working safely. Sleeping 7-8 hours a night is linked with a wide range of better health and safety outcomes.

Both workers and employers share in the responsibility to reduce risks connected to poor sleep. Therefore, it is important for both workers and managers to make sleep a priority in their personal life and in the assignment of work.

Claire Caruso, PhD, RN and Roger R. Rosa, PhD CDC/NIOSH

It has been estimated that workers' tiredness is the main and immediate cause for 18% of all accidents and injuries occurring at the workplace. Additionally 25% of all highway accidents are caused by tiredness. Traffic accidents caused by tiredness related to lack of sleep of heavy truck drivers are especially serious. According to the National Sleep Foundation, workplace tiredness is costing the United States industry at least 80 billion dollars yearly.

What Can Employers Do?

Establish at least 10 consecutive hours per day of protected time off-duty in order for workers to obtain 7-8 hours of sleep.

Frequent brief rest breaks (e.g., every 1-2 hours) during demanding work are more effective against fatigue than a few longer breaks. Allow longer breaks for meals.

Five 8-hour shifts or four 10-hour shifts per week are usually tolerable. Depending on the workload, twelve-hour days may be tolerable with more frequent interspersed rest days. Shorter shifts (e.g., 8 hours), during the evening and night, are better tolerated than longer shifts.

Examine work demands with respect to shift length. Twelve-hour shifts are easier for "lighter" tasks (e.g., desk work).

Plan one or two full days of rest to follow five consecutive 8-hour shifts or four 10-hour shifts. Consider two rest days after three consecutive 12-hour shifts.

Provide training to make sure that workers are aware of the ups and downs of shiftwork and that they know what resources are available to them to help with any difficulties they are having with the work schedule.

Examine near misses and incidents to determine the role, if any, of fatigue as a root cause or contributing cause to the incident.

The Risks of Shift Work/Long Hours

RISKS FOR WORKERS:

- Sleep deprivation
- Lack of adequate time to recover from work
- Decline in mental function and physical ability, including emotional fatigue and a decline in the function of the body's immune system
- Higher rates of depression, occupational injury, and poor perceived health
- Higher prevalence of insomnia among shift workers with low social support
- Increased risk of illness and injury
- Strain on personal relationships, such as marriage and family life
- Increased risk of long-term health effects, such as heart disease, gastrointestinal disorders, mood disturbances, and cancer

RISKS FOR EMPLOYERS:

- Reduced productivity
- Increase in errors
- Absenteeism and presenteeism (present at work but not fully functioning because of health problems or personal issues)
- Increased health care and worker compensation costs;
- Workforce attrition due to disability, death, or moving to jobs with less demanding schedules.

RISKS TO THE COMMUNITY:

Potential increase in errors by workers leading to medical errors, vehicle crashes, and industrial disasters

What can workers do?

Make sure you give yourself enough time to sleep after working your shift.

Avoid heavy foods and alcohol before sleeping and reduce intake of caffeine and other stimulants several hours beforehand since these can make it difficult to get quality sleep.

Exercise routinely, as keeping physically fit can help you manage stress, stay healthy, and improve your sleep.

Choose to sleep some place dark, comfortable, quiet, and cool so you can fall asleep quickly and stay asleep.

Seek assistance from an appropriate health-care provider if you are having difficulties sleeping.

DO YOU NEED A SLEEP STUDY?

- You should let your doctor know if you or a family member/sleep partner thinks you might have a sleep problem. Talk with your doctor if you:
- Have chronic (ongoing) snoring;
 - Often feel sleepy during the day, even though you've spent enough time in bed to be well-rested;
 - Don't wake up feeling refreshed and alert;
 - Have trouble adapting to shift work..

For additional information on sleep disorders:
<http://www.nhlbi.nih.gov/health/health-topics/topics/slpst/whoneeds.html>

ARIZONA SHARP/VPP NEWS



(Above) Tracy Rios, Site Manager for Fluor Facility & Plant Services in Tucson, AZ receives the VPP Recertification Letter from ADOSH Director Darin Perkins. Fluor originally certified as a VPP Site in April of 2009. This is their first recertification. Congratulations Fluor!



ADOSH Assistant Director and VPP Coordinator Jessie Atencio presents the VPP Re-certification letter to Bob Ellis, Plant Manager for Mesquite Power in Arlington, AZ.

This is Mesquite Power's first re-certification after their initial VPP STAR Certification, awarded in January of 2009. Great Work Mesquite!



(Above) Mesquite Power LLC is a natural gas fired power plant that began operation in April 2003. Safety is an integral part of their company's mission. An excerpt from their mission statement gives us insight to their values: **To promote new standards in reliable energy capacity while maintaining, without compromise, the highest principles of business ethics, integrity, safety and environmental responsibility.** Mesquite Power employees are held accountable for their participation and adherence to the safety program.

(Left) Tracy Rios and HSE Sr. Specialist John Scheidt proudly display the company's VPP flag and letter. Fluor Facility & Plant Services is a world-wide corporation that performs facility maintenance, lab maintenance, engineering, limited construction, prototype development, metrology shipping and receiving and risk control. Fluor provides facilities support functions for two other VPP sites, IBM and Raytheon, including hazmat response services.

(Right) Babak Emami, ADOSH Consultation Supervisor and Safety Consultant Toby Samaniego presented **J M Eagle** with a SHARP Certificate during a ceremony that included Kingman Mayor John Salem and City Councilwomen Janet Watson and Erin Cochran. Pictured directly above, from left to right, are: Jimmy Boblett, plant superintendent; Chris Williams; Alex McAfee; services manager; Salem; Mike Kenny, plant manager; Mary Doherty, safety committee member; Samaniego; Emani; and Tim Bussey, Watson, Peggy Roseth and Cochran.

In preparation for the evaluation, four Kingman plant employees completed a 30 hour safety and health training class provided by the Arizona Division of Occupational Safety and Health. As a result of their training and commitment to safety, the plant recorded injury rates lower than the industry average. JM Eagle is the world's largest manufacturer of high density plastic pipe.



PERMIT-REQUIRED CONFINED SPACE ENTRY: 29 CFR 1910.146 by Steve Weberman, IH Consultant

Many workplaces contain spaces that are considered "confined" because their configurations hinder the activities of employees who must enter, work in, and exit them. A confined space has limited or restricted means for entry or exit, and is not designed for continuous employee occupancy. Confined spaces include, but are not limited to underground vaults, tanks, storage bins, manholes, pits, silos, process vessels, and pipelines. OSHA uses the term "permit-required confined space" (permit space or PRCS) to describe a confined space that has one or more of the following characteristics:

1. Contains or has the potential to contain a hazardous atmosphere;
2. Contains a material that has the potential to engulf an entrant;
3. Has walls that converge inward or floors that slope downward and taper into a smaller area which could trap or asphyxiate an entrant;
4. Contains any other recognized safety or health hazard, such as unguarded machinery, exposed live wires, or heat stress.



Confined space hazards are addressed in specific standards for general industry, construction industry and shipyard employment and generally requires the following elements:

Written Programs: Any employer who allows employee entry into a permit space must develop and implement a written program for the safe entry into the space.

Controlling Hazards: The employer's written program should establish the means, procedures and practices to eliminate or control hazards necessary for safe permit space entry operations. A ventilation blower is the primary piece of equipment that will be utilized to control unwanted air contaminants that are at or above the permissible exposure limits and to ensure that oxygen levels are between 19.5% - 23.5%.

Equipment for Safe Entry: In addition to personal protective equipment suitable for the work being performed, other equipment that employees may require for safe entry into a permit space.

Detection of Hazardous Conditions: If hazardous conditions are detected during entry, employees must immediately leave the space. The employer must evaluate the space to determine the cause of the hazardous atmosphere and modify the program as necessary.

When entry to permit spaces is prohibited, the employer must take effective measures to prevent unauthorized entry. Non-permit confined spaces must be evaluated when changes occur in their use or configuration and, where appropriate, must be reclassified as permit spaces.

A space with no potential to have atmospheric hazards may be classified as a non-permit confined space only when all hazards are eliminated in accordance with the standard. If entry is required to eliminate hazards and obtain data, the employer must follow specific procedures in the standard.

Also, keep in mind, pit areas that contain pipes, valves and pumps where there could be hazardous liquids or gases within those pipes valves and pumps could pose three serious conditions:

1. The configuration hazard which includes the pipes, valves, and pumps that are laid out in a manner whereby an employee could get entangled and fall causing serious injury and/or death;
2. A possible engulfment hazard if liquid or gas would start to escape filling the pit area causing serious illness/injury and/or death;
3. A toxic hazard could be liquid chlorine within the piping system and the above scenario plays out which could result in serious illness, injury and/or death.

The OSHA Permit Required Confined Spaces standard does not mention how deep a confined space has to be when determining if the confined space is classified as a PRCS. A confined space becomes a PRCS based on the three criteria stated above. Pit areas that are three feet deep or less could still be considered a PRCS based on this criteria and/or if the company's safety officer or management official makes the determination that the confined space is a PRCS.

Informing Contractors and Contract Employees:

Employers must inform any contractors or contract employees whom they hire to enter permit spaces. Decide who's PRCS Plan will be followed; either the contractor's plan or the host employer's plan. There must be at least one plan involved and followed.

Entry Permits:

A permit, signed by the entry supervisor, must be posted at all entrances or otherwise made available to entrants before they enter a permit space. The permit must verify that pre-entry preparations outlined in the standard have been completed. The duration of entry permits must not exceed the time required to complete an assignment. Air quality tests and calibration information of the equipment must be written on the permit.

Worker Training:

Before the initial work assignment begins, the employer must provide proper training for all workers who are required to work in permit confined spaces. After the training, employers must ensure that the employees have acquired the understanding, knowledge and skills necessary to safely perform their job duties. There may be additional training required when conditions and the entry plan change.

After completion of training, the employer must keep a record of employee training and make it available for inspection by employees and their authorized representatives. The record must include the employee's name, the trainer's signature or initials and dates of the training.

Assigned Duties:

There are three personnel classifications of employees that will be involved with the safe entry into a PRCS. The "Entry Supervisor" will be responsible to direct employees involved in the PRCS entry and to ensure that entry procedures are followed.

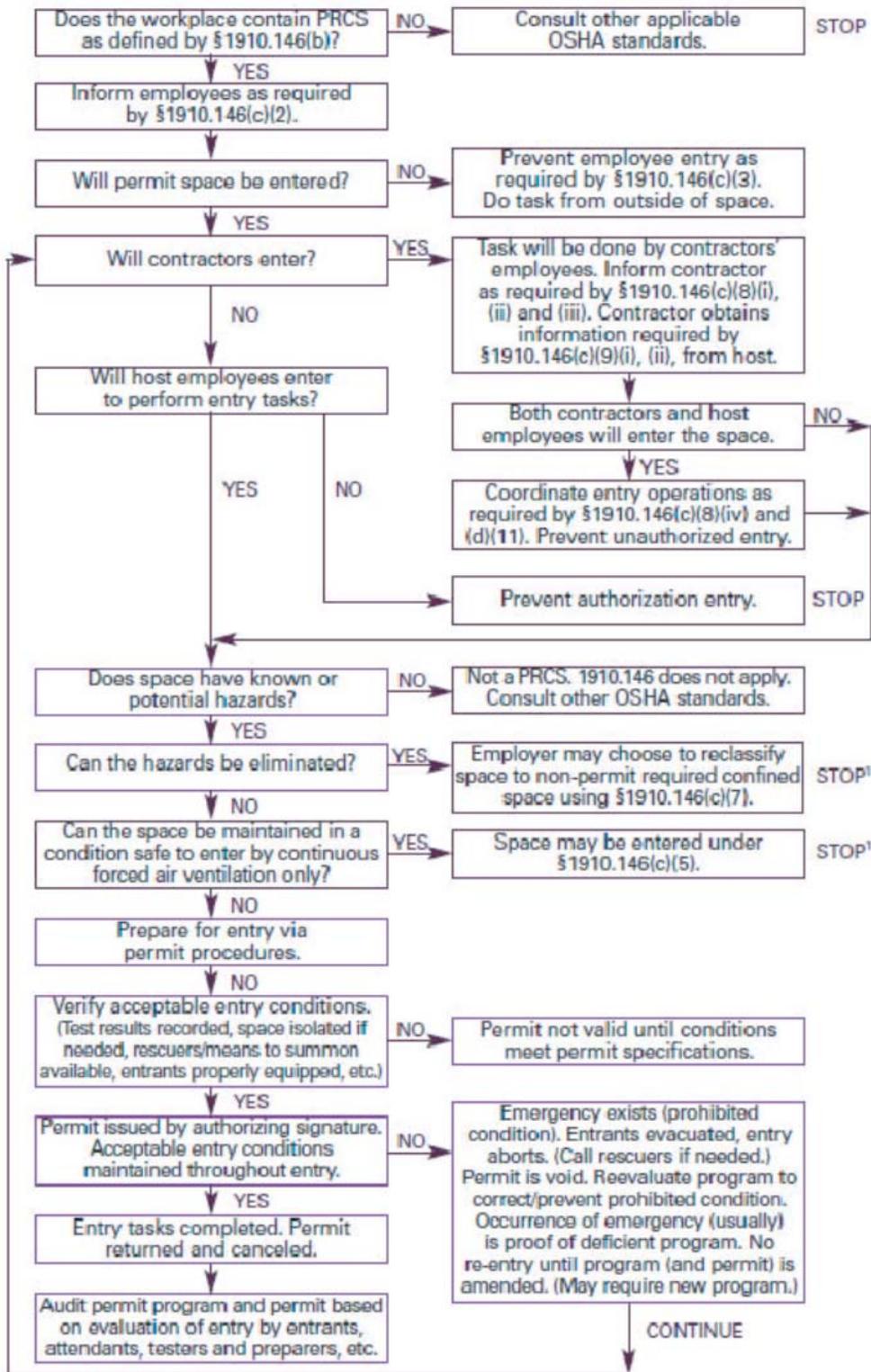
(Cont'd on page 10)



PERMIT-REQUIRED CONFINED SPACE ENTRY: 29 CFR 1910.146 (continued)

The authorized entrants are the only employees authorized to enter the PRCS. The “Attendant” is responsible for monitoring the PRCS conditions and the entrant’s physical well being while they are in the PRCS. The attendant cannot leave his post for any reason, or be assigned other responsibilities while the entrants remain in the PRCS. For example PERMITS please reference 29 CFR 1910.146 Appendix “C”

Permit-Required Confined Space Decision Flow Chart



¹ Spaces may have to be evacuated and reevaluated if hazards arise during entry.

Remembering Our Veterans
November 11, 2012



For it has been said so truthfully that it is the soldier, not the reporter, who has given us the freedom of the press. It is the soldier, not the poet, who has given us freedom of speech. It is the soldier, not the agitator, who has given us the freedom to protest. It is the soldier who salutes the flag, serves beneath the flag, whose coffin is draped by the flag, who gives that protester the freedom to abuse and burn that flag.

- Zell Miller



American Flag - Watercolor by ADOSH Compliance Officer Paul Meier

WE COULDN'T DO IT WITHOUT YOU! (WE DON'T EVEN WANT TO TRY)



Diane Robins, Yuma County Risk Management receives an engraved star from Jessie Atencio as a symbol of ADOSH's appreciation for her indispensable work on the Yuma Summit. For many years Diane has been the driving force behind ADOSH classes in Yuma.



Recently ADOSH needed some expert help translating a number of our publications from English into Spanish. Jessie Atencio contacted Pima Community College and was referred to Dr. Jeffrey Gabbitas, Professor of Linguistic Arts. Dr. Gabbitas (above)



Dr. Gabbitas then directed us to Emma Smiley, a student translator. ADOSH is grateful for the professional translation services that were rendered and looks forward to making more resources available in Spanish language format. Emma Smiley (above)