

COMMON OSHA ISSUES IN SCHOOL MAINTENANCE OPERATIONS

APRIL 2019



WHERE ARE YOUR HAZARDS? WHO IS EXPOSED?

LADDERS

FALL HAZARDS

CHEMICAL USE

ERGONOMICS

LOCKOUT/TAGOUT

MACHINE GUARDING

TRAINING/SUPERVISION

MAINTENANCE WORKERS

KITCHEN WORKERS

JANITORIAL WORKERS

OFFICE WORKERS

TEMP EMPLOYEES

TEACHERS

TRAINING

- THE EMPLOYER MUST SEE THAT WORKERS ARE **PROPERLY INSTRUCTED**... IN THE SAFE OPERATION OF ANY **MACHINERY, TOOLS, EQUIPMENT, PROCESS, OR PRACTICE** THAT THEY ARE AUTHORIZED TO USE OR APPLY.
- AN EMPLOYER MUST INSTRUCT THEIR EMPLOYEES USING **BOTH A LANGUAGE AND VOCABULARY** THAT THE **EMPLOYEES UNDERSTAND**.

IF EMPLOYERS CUSTOMARILY NEED TO COMMUNICATE WORK INSTRUCTIONS OR INFORMATION TO EMPLOYEES AT **A CERTAIN VOCABULARY LEVEL OR IN A LANGUAGE OTHER THAN ENGLISH**, THEY WILL ALSO NEED TO **PROVIDE TRAINING** TO EMPLOYEES **IN THE SAME MANNER**.

QUESTIONS ABOUT TRAINING

- WHO IS IN **CHARGE OF YOUR SAFETY TRAINING PROGRAM?**
- **WHO DOES THE TRAINING?** DOES IT HAPPEN BEFORE THE EMPLOYEE STARTS WORKING?
- **WHAT IS THE CONTENT?** HOW BROAD IS IT? HOW SPECIFIC IS IT?
- ARE ANY **CERTIFICATIONS** ISSUED?
- **WHO KEEPS RECORDS?**
- DO YOU EVER CONDUCT **REFRESHER TRAINING** WITH EMPLOYEES?
- HOW OFTEN IS YOUR **TRAINING PROGRAM AUDITED?**
- DOES EVERYONE RECEIVE **GENERIC TRAINING**, OR IS YOUR PROGRAM TAILORED TO THE **SPECIFIC DEPARTMENT** THE EMPLOYEE WORKS IN?
- WHAT DO YOU DO TO **ENSURE THE TRAINING YOU PROVIDED WAS EFFECTIVE?**

SUPERVISION

- THE EMPLOYER MUST SEE THAT WORKERS ARE **PROPERLY... SUPERVISED** IN THE SAFE OPERATION OF ANY MACHINERY, TOOLS, EQUIPMENT, PROCESS, OR PRACTICE THAT THEY ARE AUTHORIZED TO USE OR APPLY.
- THE EMPLOYER MUST TAKE ALL **REASONABLE MEANS** TO **REQUIRE** EMPLOYEES:
 - TO **WORK AND ACT** IN A **SAFE** AND HEALTHFUL MANNER;
 - TO **CONDUCT THEIR WORK IN COMPLIANCE** WITH ALL APPLICABLE SAFETY AND HEALTH RULES;



QUESTIONS ABOUT SUPERVISION

ARE SUPERVISORS ACCOUNTABLE FOR THE **SAFETY PERFORMANCE** OF THOSE
THEY SUPERVISE?

DO THEY **KNOW THE SAFETY RULES** APPLICABLE TO THEIR JOBS?

HAVE THEY BEEN TRAINED IN THE **SAFETY REQUIREMENTS** OF THE JOBS THEY
SUPERVISE?

HOW ARE VIOLATIONS OF SAFETY RULES HANDLED? IS IT UNIFORM?



THE TAKEAWAY

ISSUES WITH **TRAINING AND SUPERVISION** CAN **INFLUENCE THE SAFETY CULTURE** AND THE NATURE OF HOW WORK IS PERFORMED

LISTEN TO EMPLOYEES, **EMPOWER AND TRAIN SUPERVISORS**

MAKE SURE THE **MONITORING AND ENFORCEMENT** OF **SAFETY RULES** IS PART OF YOUR SUPERVISORY DUTIES

PERIODIC AUDITS, EMPLOYEE INTERVIEWS AND EMPLOYEE SURVEYS ARE SOME WAYS TO **ROOT OUT DEFICIENCIES, IMPROVE WORK PRACTICES, AND MONITOR SAFETY PERFORMANCE**

KEEP AN OPEN DIALOGUE WITH **UNIONS/STEWARDS** REGARDING THE **IMPORTANCE OF SAFETY**

The background is a light blue gradient. In the top-left and bottom-right corners, there are several realistic-looking water droplets of various sizes, some overlapping. The droplets have highlights and shadows, giving them a three-dimensional appearance.

LET'S LOOK AT SOME SPECIFIC SAFETY ISSUES

WALKING WORKING SURFACES

- ALL PLACES OF EMPLOYMENT, PASSAGEWAYS, STOREROOMS, SERVICE ROOMS, AND WALKING-WORKING SURFACES ARE KEPT IN A **CLEAN, ORDERLY, AND SANITARY CONDITION.**
- AISLES, PASSAGEWAYS, AND WALKWAYS ARE OF ADEQUATE WIDTH FOR THEIR INTENDED OR ACTUAL USE, **AND IN NO EVENT SHALL THEY BE LESS THAN 22 INCHES WIDE.**
- WALKING-WORKING SURFACES ARE **INSPECTED, REGULARLY AND AS NECESSARY,** AND MAINTAINED IN A SAFE CONDITION;
- THE FLOOR OF EACH WORKROOM IS MAINTAINED IN A CLEAN AND, TO THE EXTENT FEASIBLE, IN A DRY CONDITION. WHEN WET PROCESSES ARE USED, DRAINAGE MUST BE MAINTAINED AND, TO THE EXTENT FEASIBLE, DRY STANDING PLACES, SUCH AS FALSE FLOORS, PLATFORMS, AND MATS MUST BE PROVIDED.

SCISSOR LIFTS, BOOM LIFTS

- SCAFFOLDS USED IN GENERAL INDUSTRY MUST MEET THE REQUIREMENTS IN 29 CFR PART 1926, SUBPART L (SCAFFOLDS).
- THE MANUFACTURER'S OPERATING MANUAL MUST BE WITH THE EQUIPMENT. YOU **MUST FOLLOW** ALL **OPERATING AND MAINTENANCE INSTRUCTIONS AND RECOMMENDATIONS OF THE MANUFACTURER.**
- HOW MANY EMPLOYEES USE SCISSOR LIFTS? ARE THEY FROM DIFFERENT DEPARTMENTS? HAVE THEY BEEN TRAINED?

FALL PROTECTION

- MAINTENANCE, JANITORIAL WORKERS, ADMINISTRATIVE STAFF- WHO GOES UP TO GET A BALL/FRISBEE/DEBRIS OFF THE ROOF?
- TRIGGER HEIGHT TO IMPLEMENT SOME SORT OF FALL PROTECTION IS **4 FEET**
- IF YOU **COME WITHIN 6 FEET** OF THE EDGE OF A LOW-SLOPE ROOF (OR AN UNPROTECTED SKYLIGHT), YOU HAVE TO USE ONE OF THE FOLLOWING FOUR OPTIONS:
 - FALL ARREST, FALL RESTRAINT, GUARDRAILS, SAFETY NET
 - LOW SLOPE ROOFS ARE DEFINED AS THOSE WITH A 2:12 PITCH
- 6-15 FEET FROM THE EDGE OF THE ROOF (OR AN UNPROTECTED SKYLIGHT), YOU CAN USE A DESIGNATED AREA IF THE WORK IS TEMPORARY AND INFREQUENT

PERSONAL PROTECTIVE EQUIPMENT

- THE EMPLOYER **MUST PROVIDE TRAINING** TO EACH EMPLOYEE WHO IS REQUIRED BY THIS SECTION TO USE PPE AND EACH EMPLOYEE THAT IS PROVIDED TRAINING **MUST KNOW AT LEAST THE FOLLOWING:**
- WHEN PPE IS NECESSARY;
- WHAT PPE IS NECESSARY;
- HOW TO PROPERLY DON, DOFF, ADJUST, AND WEAR PPE;
- THE LIMITATIONS OF THE PPE; AND,
- THE PROPER **CARE, MAINTENANCE, USEFUL LIFE AND DISPOSAL** OF THE PPE.
- EMPLOYEES USING CHAIN SAWS MUST WEAR CHAPS OR LEG PROTECTORS THAT COVER THE LEG FROM THE UPPER THIGH TO MID-CALF.

TOOLS & EQUIPMENT

- EACH **EMPLOYER** SHALL BE RESPONSIBLE FOR THE **SAFE CONDITION OF TOOLS AND EQUIPMENT** USED BY EMPLOYEES, INCLUDING TOOLS AND EQUIPMENT WHICH MAY BE FURNISHED BY EMPLOYEES.
- ALL PLACES OF EMPLOYMENT MUST BE **INSPECTED BY A QUALIFIED PERSON** OR PERSONS AS OFTEN AS THE **TYPE OF OPERATION OR THE CHARACTER OF THE EQUIPMENT REQUIRES**.
- DEFECTIVE EQUIPMENT OR UNSAFE CONDITIONS FOUND BY THESE INSPECTIONS MUST BE REPLACED OR REPAIRED OR REMEDIED PROMPTLY.

TOOLS & EQUIPMENT DISCUSSION

- ARE EMPLOYEES INSPECTING THEIR EQUIPMENT BEFORE USE?
- ARE SUPERVISORS AND EMPLOYEES TRAINED IN REMOVAL FROM SERVICE CRITERIA FOR THEIR TOOLS/EQUIPMENT?
- ARE EMPLOYEES ALLOWED TO BRING IN TOOLS FROM HOME?
- ARE WORKPLACE INSPECTIONS CONDUCTED BY PEOPLE TRAINED IN HAZARD IDENTIFICATION?
- ARE SUPERVISORS TRAINED IN HAZARD IDENTIFICATION FOR THEIR SPECIFIC JOB?

LADDERS

THE EMPLOYER MUST ENSURE THAT:

- LADDERS ARE USED **ONLY FOR THE PURPOSES FOR WHICH THEY WERE DESIGNED**;
- LADDERS ARE **INSPECTED BEFORE INITIAL USE IN EACH WORK SHIFT**, AND MORE FREQUENTLY AS NECESSARY, TO IDENTIFY ANY VISIBLE DEFECTS THAT COULD CAUSE EMPLOYEE INJURY;
- THE CAP AND TOP STEP OF A STEPLADDER ARE **NOT USED AS STEPS**;
- THE EMPLOYER MUST **TRAIN EACH EMPLOYEE** IN THE PROPER **CARE, INSPECTION, STORAGE, AND USE** OF EQUIPMENT COVERED BY THIS SUBPART BEFORE AN EMPLOYEE USES THE EQUIPMENT.

NOTICE A TREND?

IN VIRTUALLY ALL OF THE PREVIOUSLY MENTIONED RULES, IF YOU ARE ABIDING BY THE RECOMMENDATIONS AND SPECIFICATIONS OF THE MANUFACTURER, YOU ARE ALSO COMPLYING WITH OSHA RULES

LOCKOUT/TAGOUT

- CONSTRUCTING,
- INSTALLING,
- SETTING UP,
- ADJUSTING,
- INSPECTING,
- MODIFYING,
- LUBRICATING,
- UN-JAMMING,
- CLEANING,
- TOOL CHANGES

Remember: If you can do these **without removing a guard, bypassing a safety device, or putting yourself in a danger zone**, the rules don't apply

ERGONOMICS

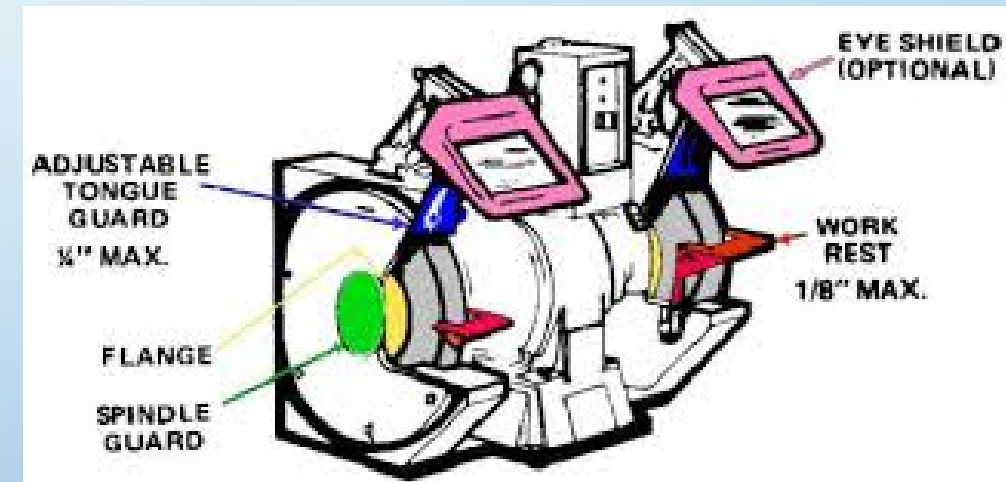
- DO YOU HAVE A STRETCH AND FLEX PROGRAM IN PLACE FOR MAINTENANCE WORKERS/DRIVERS/MOBILE WORKFORCE? HOW MUCH PLANNING/EFFORT GOES INTO PREVENTION OF SOFT TISSUE INJURIES?
- HAVE YOU ANALYZED THE WORKSTATIONS OF EMPLOYEES WHO MAINLY WORK FROM A DESK ON THE COMPUTER ALL DAY?
- DO YOU SEND EMPLOYEES TO AN OCCUPATIONAL HEALTH DOCTOR/CLINIC WHEN THEY ARE INJURED ON THE JOB?

OCCUPATIONAL HEALTH CONCERNS

- LEAD-BASED PAINT EXPOSURE
- SILICA EXPOSURE: BALL FIELD CONDITIONER
- NOISE EXPOSURE: LAWN MAINTENANCE
- BLOODBORNE PATHOGENS
- CONFINED SPACE ENTRY
- MANGANESE EXPOSURE DURING WELDING
- MOLD EXPOSURE
- INDOOR AIR QUALITY

TOP 10 OSHA VIOLATIONS-2018 PRIMARY & SECONDARY SCHOOLS

- 10. EXCAVATIONS
- 9. DAMAGED ELECTRICAL EQUIPMENT
- 8. ABRASIVE WHEEL GUARDING
- 7. RESPIRATOR PROGRAM
- 6. OSHA 300 ELECTRONIC REPORTING
- 5. EYE PROTECTION



TOP 10 OSHA VIOLATIONS-2018 PRIMARY & SECONDARY SCHOOLS

- 4. SCAFFOLD
- 3. PERSONAL PROTECTIVE EQUIPMENT ASSESSMENT
- 2. ASBESTOS
- 1. HAZARD COMMUNICATION PROGRAM



TOP 10 REASONS TO USE OR-OSHA CONSULTATION

- 10. OUR STAFF HAS OVER 600 YEARS OF COLLECTIVE S&H EXPERIENCE
- 9. WE'RE THE GROUP EVERYONE CALLS FOR SAFETY AND HEALTH ANSWERS
- 8. OUR REPORTS ARE "FOR YOUR EYES ONLY"
- 7. WE'RE NOT ENFORCEMENT
- 6. WE WRITE REPORTS, NOT CITATIONS



WHY USE OREGON OSHA CONSULTATION

- 5. YOU KNOW WE ARE COMING AND WE WILL NOT WATCH FROM ACROSS THE STREET.
- 4. YOU DO NOT HAVE TO SHUTDOWN YOUR OPERATIONS WHEN WE ARRIVE
- 3. WE ARE THE GOVERNMENT AND WE ARE HERE TO HELP YOU
- 2. IF EVERYONE HERE REQUESTS A CONSULTATION IT WILL HELP MY PERFORMANCE REVIEW
- 1. ITS FREE, ITS FREE, ITS FREE

