

OSHA'S TOP TEN VIOLATIONS

OSHA announced its preliminary list of the Top 10 most frequently cited workplace safety violations for fiscal year 2019. OSHA publishes this information so employers can take actions to evaluate their operations and safety programs and avoid violations before an OSHA inspector shows up. Composites manufacturers can use this list to take steps to find and fix recognized hazards to be compliant and keep workers safe.

1. [Fall Protection – General Requirements](#) (29 CFR [1926.501](#)) – 6,010
Violations can be issued if the employer does not provide adequate fall protection to employees. OSHA requires fall protection at elevations of four feet in general industry workplaces.
2. [Hazard Communication](#) (29 CFR [1910.1200](#)) – 3,671
No hazard communication program or training and lack of GHS-compliant SDSs are the most common violations. Workers have the right-to-know the hazards and identities of chemicals they are exposed to and what precautions they can take to protect themselves.
3. [Scaffolding](#) (29 CFR [1926.451](#)) – 2,813
80% of fall accidents happen from 30 feet or less. Workers on scaffolds must be protected by a fall arrest system or a guardrail system.
4. [Lockout-Tagout](#) (29 CFR [1910.147](#)) – 2,606
Lockout-Tagout is required to prevent employees from the unexpected energization, startup or release of energy from equipment and machinery. Not having lockout-tagout instructions, not conducting a periodic evaluation of the program, and failure to train employees and/or utilize locks and tags are frequent violations.
5. [Respiratory Protection](#) (29 CFR [1910.134](#)) – 2,450
In addition to the requirement to have a respiratory protection program, employers must also ensure employees get a medical evaluation before being allowed to wear a respirator and conduct a “fit” test prior to each use.
6. [Ladders](#) (29 CFR [1926.1053](#)) – 2,345
The most common violations are ladders not extending at least three feet above a landing, damaged/bent ladders, misusing or using the wrong type of ladder for the task, and employees using the top step of a ladder.
7. [Powered Industrial Trucks](#) (29 CFR [1910.178](#)) – 2,093
Documentation is required to show that operators have been trained on safe operation of the forklifts (and electric pallet jacks) they use. Refresher training and re-certification is required every three years. Forklifts must be operated in a safe manner and equipment and accessories must be in good condition.



8. [Fall Protection – Training](#) (29 CFR [1926.503](#)) – 1,773

Violations can be given for lack of training, inadequate or poorly understood training, and lack of training documentation. Be sure to test your employees and keep records as evidence that the training was understood.



9. [Machine Guarding](#) (29 CFR [1910.212](#)) – 1,743

Employers are required to protect employees from the hazards of moving machinery by utilizing machine guarding for “point of operation”, ingoing nip points, rotating parts, flying chips and sparks. This includes proper anchoring of equipment and guarding on fan blades.



10. [Personal Protective Equipment- Eye and Face Protection](#) (29 CFR [1926.102](#)) – 1,411

Typical violations include not having eye protection, side shields, and face shields to protect workers from flying parts, liquid chemicals and radiate energy (e.g., welding).



Source: <https://www.nsc.org/in-the-newsroom/osha-reveals-top-10-violations-for-2019-at-nsc-congress-and-expo>

EPA MACT STANDARD UPDATE

On November 1, 2019, EPA published a proposed rule change in the Federal Register to amend the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Surface Coating of Plastic Parts and Products. The rule is applicable to composites manufacturers with paint lines subject to Subpart PPPP. It does not apply to gel coating operations that are subject to Subpart WWWW. Key changes will require major sources of HAPs to comply with administrative changes for recordkeeping and reporting during startup, shutdown and malfunction. Comments on the proposed rule change are due December 2, 2019. See <https://www.govinfo.gov/content/pkg/FR-2019-11-01/pdf/2019-18345.pdf> for more information.

HEARING PROTECTION AND NOISE EXPOSURE

Depending on the length of exposure and level of noise (measured in decibels), workers can experience potentially damaging noise that can lead to permanent hearing loss. It is estimated that over 22 million workers in the US are exposed annually, but the good news is that **hearing loss in the workplace is preventable** by reducing noise through engineering controls, shortening exposure times and providing hearing protection!

United States. Per 29 CFR 1910.95, OSHA requires a Hearing Conservation Program to be developed if workers are exposed to 85 decibels (dBA) of noise for an 8-hour time-weighted average (TWA). The program requires employers to measure noise levels and provide free annual hearing (audiometric) exams, hearing protection, and training to employees. The permissible exposure limit (PEL) is 90 dBA for an 8-hour TWA. At higher noise levels, exposure time must be reduced by a standard exchange rate unless hearing protection is used. For example, only 2 hours of exposure to 100 dBA are allowed if a worker is not wearing any hearing protection. See the Composites One Regulatory Manual - Tab 12 located on B2B and OSHA’s website <https://www.osha.gov/SLTC/noisehearingconservation/> for more information on noise exposure the Hearing Conservation Program.

Canada. Similar to US OSHA regulations, Health Canada has occupational exposure limits (OELs) for workplace noise. The criterion level (Lc) is the steady noise level permitted for a full 8-hour work shift. Most jurisdictions have an 85 dBA as the Lc, but it is 90 dBA for Quebec and 87 dBA for organizations

following federal noise regulations. More can be found on the Canadian Centre for Occupational Health and Safety website (https://www.ccohs.ca/oshanswers/phys_agents/exposure_can.html).

Don't forget to keep records of noise exposure measurements, especially for grinding operations. The National Institutes for Occupational Health and Safety (NIOSH) has a free Sound Level Meter app that may help you evaluate noise levels <https://apps.apple.com/us/app/niosh-slm/id1096545820>. As a rule of thumb, if you need to shout to be heard at 3 feet away from a person, noise levels are likely over 85 decibels. Further testing using a dosimeter can determine individual exposures, which is important when determining the type of hearing protection needed for workers in various departments or conducting specific tasks. **Composites manufacturers may want to follow recommendations from NIOSH to implement noise controls such as hearing protection at 85 dBA.**

Hearing protection comes in many different styles and noise reduction ratings (NRRs). See Composites One's website for your personal protective equipment (PPE) needs.
<https://www.compositesone.com/product/process-consumables/ppe/>



Ask the Compliance Expert

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