

OSHA's Top 10 OSHA Citations for 2015

OSHA revealed its preliminary Top 10 most frequently cited workplace safety violations for the fiscal year and 2015 at the National Safety Council (NSC) Congress and Expo. The OSHA Top 10 list is a roadmap that identifies the hazards to avoid on the journey to safety excellence.

1. Fall Protection (1926.501) – 6,721
2. Hazard Communication (1910.1200) – 5,192
3. Scaffolding (1926.451) – 4,295
4. Respiratory Protection (1910.134) – 3,305
5. Lockout/Tagout (1910.147) – 3,002
6. Powered Industrial Trucks (1910.178) – 2,760
7. Ladders (1926.1053) – 2,489
8. Electrical – Wiring Methods (1910.305) – 2,404
9. Machine Guarding (1910.212) – 2,295
10. Electrical – General Requirements (1910.303) – 1,973

Source: <http://ehstoday.com/standards/osha/nsc-oshas-most-cited-violations-1006>

Update on OSHA Combustible Dust Standard

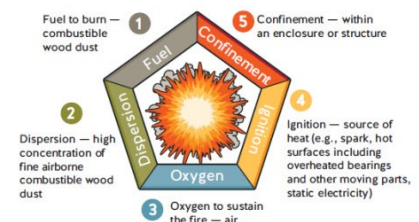
Under certain circumstances, **combustible dusts** (e.g., wood, metal, grain, soap, sugar, coal, plastic, rubber, and certain textile materials) can cause catastrophic explosion and fire. Between 1980 and 2005 there were 281 combustible dust incidents that killed 119 workers, injured 718 and caused extensive damage. In response, the Occupational Health & Safety Administration (OSHA) has taken measures to address combustible dust hazards.

There are five factors required for a combustible dust explosion: **fuel** (dust), **oxygen**, **ignition** (heat, spark, flame, static), **dispersion**-suspension of the dust in the air, and **confinement** (containment in an area, vessel, container). Not only is the initial (primary) explosion of fugitive dust dangerous, but it may dislodge additional accumulated dust in the air resulting in a more destructive, secondary explosion.

Typical causes come from a combination of factors including:

- Poor housekeeping – excessive accumulation of combustible dust
- Lack of hazard recognition – employees and management are unaware of dust hazards
- Lack of engineering controls - missing or improperly maintained dust collection systems
- Improper maintenance – leaks that allow dust to escape, disperse or accumulate

OSHA does not have a specific regulation on combustible dust, but inspections have increased under the Combustible Dust National Emphasis Program (NEP) resulting in enforcement and penalties. Employers are frequently cited under Hazard Communication [29 CFR 1910.1200], Housekeeping [1910.22(a)], and the General Duty Clause (Section 5(a)(1) of the OSH Act). OSHA has begun the rulemaking process and is currently in the pre-



rule stage with a Small Business Review panel expected in February 2016. More information can be found online at <https://www.osha.gov/dsg/combustible-dust/index.html>.

Prevention and Control Measures (from OSHA’s Combustible Dust Poster)

<https://www.osha.gov/Publications/combustible-dust-poster.pdf>

Prevention Measures	Separator devices to remove foreign materials that could ignite dusts, Employee training on chemicals that could become combustible dusts
Control Measures and Ignition Control	Hot Work Permit program, Electrically-powered vacuum cleaners and fork trucks rated for Class II locations, Grounding and bonding procedures to dissipate static charge
Dust Control	Ducts and dust collectors to prevent leaking-fugitive emissions, Working surfaces that facilitate cleaning and minimize dust accumulation, Regular housekeeping to minimize dust from floors-surfaces-ducts-piping and hoods
Protection Measures	Emergency Action Plan and un-obstructed emergency exit routes, Dust collectors located outside buildings (some exceptions), Explosion relief venting, Dust collector systems with spark detection and explosion deflagration suppression, Isolation devices for equipment connected by ductwork

Bonding and Grounding – QUICK TIPS

Static electricity can build-up and create a fire risk whenever pumping, pouring, transferring or bulking flammable liquids from one container to another. Problems with grounding and bonding include:

- Inappropriate choice of what is used as a pathway to ground
- Poor connections (e.g, loose wires, heavy paint layers on containers/drums)
- Damaged conductors
- Multiple containers in series



Best Management Practices

- **Confirm the ground.** Confirm grounding conductor is actually grounded
- **Create a reliable electrical connection.** Attach the grounding conductor to the source of ground permanently with metal-to-metal contact (e.g., mechanical, bolt and nut; welded connection).
- **Chisel-point clamps.** If grounding a single item to ground, use a chisel-point clamp requiring wrench tightening to ensure connection goes through paint on drums.
- **Conductor wire.** Use a conductor sufficient for the application (e.g., No. 4 copper for ground, No. 6 copper for bonding).
- **Clamp to conductor connection.** Make sure the clamp at the end of the grounding conductor is attached to the conductor to ensure metal-to-metal contact (e.g., compression fitting, welded connection, etc.).
- **Paint and other coatings.** When applying bonding or grounding straps to containers or other items, make sure the chisel point clamps are tightened to break through any layers of paint or other coatings.

Source: <https://www.wisconsin.edu/ehs/osh/bond-ground/>

OSHA GHS Hazard Communication – Update

OSHA has updated its hazard communication webpage (<https://www.osha.gov/dsg/hazcom/index.html>) providing easy access to topics on the agency’s revised standard. The next deadline for compliance is December 1st, when distributors shall not ship containers that are not compliant with new GHS labeling requirements.

As many manufacturers are still struggling to convert to the GHS-compliant SDSs and labels, OSHA’s Interim Enforcement Guidance for HCS 2012 (https://www.osha.gov/dep/enforcement/hcs_guide_052015.html) provides enforcement relief for the supply chain when there is evidence of reasonable diligence and good faith to obtain this documentation. **Composites One** is continuing due diligence efforts, maintaining records of these efforts, tracking progress, and providing updated information to customers as it becomes available.

For easy access to current SDSs, log into our B2B customer website at www.b2bcomposites.com or contact a Composites One Customer Service Representative to register and set-up account access.

Ask the Compliance Expert

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