

Are You OSHA Compliant?

Make sure your facility is safe by doing your own OSHA-type safety inspection

By Jim Parrie, Ph.D., CPF

Many people look upon OSHA as a thorn in the side. In fact, many of the regulations can help to make your facility more efficient and productive. No matter how organized a facility is you cannot prevent 100 percent of the accidents all of the time. But you can minimize the opportunity for accidents and the severity of those accidents.

All businesses, large or small, should conduct a regular OSHA-type safety inspection at least quarterly. Using OSHA-type inspection forms can assist you in ensuring your employees' safety and health. Your employees' attitude toward health, safety, and the environment comes directly from you. How you enforce cleanliness and safety tells your employees how you feel about them, your company, your product, and life itself.

Electrical

One common safety situation that has caused fires in framing facilities is improperly maintained electrical equipment. This may consist of cracked outlet covers, receptacles, junction boxes, and the like. It is very common to find multiple pieces of electrical equipment plugged into one surge protector that may be plugged into another surge protector forming a giant electrical octopus. This is extremely dangerous. It is further compounded by the fact that most facilities have large amounts of sawdust everywhere. A small spark or excessive heat in an extension cord can cause sawdust to ignite, and create an explosion or fire.

I have routinely seen employees use frayed or spliced extension cords instead of buying a new one. Asked why, the typical response is that everyone is too busy. Which is cheaper, a \$500 fine from the fire marshal, a business-ending fire, or an \$8 extension cord?

Blocked Electrical Panel Box Aisle

All aisles and passageways need to be kept clear and in good repair with no obstructions that could create a hazard. Permanent aisles and passageways also must be appropriately marked. Access to electrical control panels must be kept clear at all times. Make sure that electrical panel boxes are kept closed and are easily accessible in the event that an emergency shut off is needed.

Lights Without Safety Guards

Lamps for general illumination need to be protected from accidental contact or breakage. According to OSHA, "Protection shall be provided by elevation of at least 7 feet from normal working surface or by a suitable fixture or lamp holder with a guard." However, production framers often have sticks of moulding that are 10' to 12' long. Make sure that all task lighting is high enough for any materials you use. You can use wire cages over the outside of the fixtures or clear plastic tubes over each fluorescent tube.

Fire Protection

Fire is a four-letter word that no owner wants to hear in his or her facility. A fire itself generally causes less damage than the smoke and water that result from it. Many businesses are under-insured for fire disasters. They don't carry enough coverage or don't have business continuation insurance. Fire prevention is still often neglected because the general feeling is, "We have never had a fire" or "It won't happen to us." The logic is common but baffling. Should you wait until you have a fire to conduct fire prevention or buy fire insurance? Fire prevention steps can be quite simple and involve common sense. Here are some

The third in a series of articles that will provide an overview of OSHA regulations that can affect production framing. These articles are not "how to's" because of the sheer size of OSHA regulations but are designed to point out common dangers for employees at framing businesses. Nor are they meant to be the sole resource for creating an OSHA policy for a business. There are many other resources and consultants available that can assist you in complying with OSHA regulations, and some may also be free.

excerpts from OSHA that may help you avert disaster. According to OSHA, an employer must provide portable fire extinguishers for employees to use in the workplace, and employees must receive annual fire extinguisher training. In many facilities it is common to find the following:

Fire Extinguisher/Aisle Blocked: Make sure that aisles and pathways to fire extinguishers are always kept clear. This includes not being covered by jackets, coats, or having pneumatic or electrical cords placed on or wrapped around them.

Fire Extinguisher Improperly/Not Mounted: “The employer shall provide portable fire extinguishers. The employer shall mount, locate, and identify them so they are readily accessible to employees.” Mount between 36" and 44" above floor level.

Fire Extinguisher Out of Date Inspection/Charged Status: “Portable fire extinguishers shall be inspected monthly and serviced at least once a year. A record shall be kept to show the maintenance or recharge date.” The monthly inspection can be an in-house procedure.

Fire Extinguisher Needs Charge Gauge: “The employer shall assure that portable fire extinguishers are maintained in a fully charged (charge gauge) and operable condition and kept in their designated places at all times except during use.”

Fire Extinguisher Needed Within 75' of Flammable(s): “A suitable fire control device, such as a small hose or portable fire extinguisher, shall be available at locations where flammable or combustible liquids are present.” If your facility has a fire control sprinkler system, it must be inspected and serviced on an annual basis and all control valves must be secured in an open position.

Signs and Labeling

Many OSHA regulations can actually provide for a more organized and efficient work environment. They dictate that adequate signage be used throughout all manufacturing areas. This signage can actually help train new employees and make it easier for everyone to know where things are and what to do next. Some common signage violations are:

Door(s) Need Identifying Signs

“Any door, passage, or stairway which is neither an

exit nor a way of exit access, and which is so located or arranged as to be likely to be mistaken for an exit, shall be identified by a sign reading 'Not an Exit' or similar designation, or shall be identified by a sign indicating its actual character, such as 'To Basement,' 'Storeroom,' 'Linen Closet,' or the like.” It is common to see exit signs that are either blocked or doors that are locked. This is an easy fine for most fire marshals. You can handle all of your mandatory signage needs in a day and make you place look more professional. Use clear signage so people know where the supplies are located, where the mat remnants are, and so on. Training goes much faster when there is clear, adequate signage.

Exit Sign(s) & Not an Exit Sign(s)

“Every building designed for human occupancy shall be provided with enough exits to permit the prompt escape of occupants in case of emergency. The word 'EXIT' must be composed of plainly legible letters not less than 6 x ¾ inches and in contrast with surroundings.” Any door, passage, or stairway that is not an exit or a way to exit shall be identified by a sign reading “NOT AN EXIT.” These words must be composed of plainly legible letters not less

Immediate Needs

- | | |
|---|--|
| <input type="checkbox"/> Hazard Communication Program
Per 29 CFR 1910.1200 | <input type="checkbox"/> Contingency Plan
Per 40 CFR 265.50 |
| <input type="checkbox"/> Personal Protective Program
Per 29 CFR 1910.132 | <input type="checkbox"/> Tier I and Tier II
LA Dept. of Public Safety |
| <input type="checkbox"/> Bloodborne Pathogen Program
Per 29 CFR 1910.1030 | <input type="checkbox"/> Forklift
Per 29 CFR 1910.178 |
| <input type="checkbox"/> Respirator Program
Per 29 CFR 10.123,132,134 | <input type="checkbox"/> Lockout/Tagout
Per 29 CFR 1910.147 |
| <input type="checkbox"/> Emergency Action Plan
Per 29CFR 1910.38 | <input type="checkbox"/> Confined Space
Per 29 CFR 1910.146 |
| <input type="checkbox"/> Storm Water Runoff Permit
Per LRS 48:385 | <input type="checkbox"/> Personnel Trained in first aid/CPR
Per 29 CFR 1910.151 |

Here are some checklists you can use to see how your facility stacks up to OSHA guidelines. These lists are not meant to be all-inclusive or to substitute for OSHA regulations but to help you begin to make your facility compliant.

than 6 x ¾" and in contrast with surroundings.

Exit Blocked/Locked

“Approaches to and from exits must be unobstructed, unlocked and always accessible during hours of operation.” Many framing facilities block most exits because they need the wall space to place goods. Check with your local fire code to see what minimum number of exits is needed for you square footage, occupancy, and business type.

No Smoking/Flammable Sign(s)

“Source of ignition, Class I liquids shall not be handled, drawn or dispensed where flammable vapors may reach a source of ignition. Smoking shall be prohibited except in designated localities. NO SMOKING/ FLAMMABLE sign(s) shall be conspicuously posted where haz-

ard from flammable liquid or vapors could be reasonably expected to exist. (This will apply to all dealership shop areas. Service, Paint and Body shop and may include undercoated and make-ready area as well. Designated smoking areas must have at least a 20 foot circumference from flammable materials.)” Smokers will always find a place to smoke. You should provide a safe, clean, and comfortable area for them. If you stick them outside in the sleet and snow, some will seek comfort indoors in an inconspicuous place, like maybe your moulding area. Most facilities do not allow smoking indoors, but you should still provide a designated and comfortable area for smoking outside.

Fire Extinguisher Sign(s)

In framing facilities it is really common to stack boxes

Signage

<ul style="list-style-type: none"> <input type="checkbox"/> EXIT <input type="checkbox"/> NOT AN EXIT <input type="checkbox"/> FIRE EXTINGUISHER <input type="checkbox"/> FLAMMABLE <input type="checkbox"/> WATCH YOUR STEP <input type="checkbox"/> HIGH VOLTAGE <input type="checkbox"/> DIRECTIONAL ARROWS <input type="checkbox"/> EYE PROTECTION REQUIRED <input type="checkbox"/> NO SMOKING* <input type="checkbox"/> PERSONNEL CPR/FIRST AID <input type="checkbox"/> DOOR LABEL SIGNS 	<ul style="list-style-type: none"> <input type="checkbox"/> EYEWASH STATION* <input type="checkbox"/> OSHA POSTER <input type="checkbox"/> HEAD CAUTION * <input type="checkbox"/> PERSONAL PROTECTIVE EQUIPMENT SIGNAGE <input type="checkbox"/> SCA POSTER* <input type="checkbox"/> FIRST AID CABINET* <input type="checkbox"/> FOOT PROTECTION* <input type="checkbox"/> OTHER.* <p>* Suggests items needed in specific areas</p>
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of molding in front of a fire extinguisher. This is an easy fire marshal fine. It also leads to poor procedures and inefficiency. You should have designated storage and staging areas.

Need Compressed Air Gauge

“Every air receiver must be equipped with a pressure gauge and with one or more safety valves. The safety valve(s) must be able to prevent pressure in the receiver from exceeding the receiver's maximum allowable working pressure by more than 10 percent. No valve of any type may be placed between the air receiver and its safety valve(s). All safety valves must be tested frequently and at regular intervals to determine whether they are in good condition. Air used for cleaning purposes must not exceed 30 psi.”

Other Hazards

Hazardous conditions or practices not covered in an OSHA standard may be covered under Section 5 of the act. “Each employer shall furnish to each of his employees and a place of employment which are free from recognized hazards that are causing or are likely to cause death or seri-

ous physical harm to his employees.” This is the number one cause of slips, falls, and trip hazards in framing facilities. National research has shown that it takes approximately 8 to 10 minutes a day to eliminate these problems. It is highly recommended that your policy be “If you are not actively using pneumatic/electrical cords, have them put away,” and “If you spill it on the floor, clean it up immediately.” Enforcing this policy will tremendously reduce employee injuries and Workman's Comp claims.

Restroom and Drinking Facilities

“All facility restrooms and drinking fountains must be kept in a clean and sanitary condition at all times.” It is not uncommon to see employees pouring paint thinner or cleaning brushes in the kitchen sink or drinking fountain. This is a huge NO! Not only are you violating OSHA and

EPA regulations, you are possibly placing cancer-causing agents on surfaces that you will then touch or consume fluids from. Areas where food will be prepared or consumed should never be used to clean, mix, apply, or dispose of paint, sprays, solvents, or other potentially hazardous materials. OSHA regulations stipulate that, “Food and/or beverage items shall not be consumed in areas where

hazardous materials or vapors are present.”

Personal Protective Equipment

“Protective equipment, including personal protective equipment for eyes, face, head, and extremities; protective clothing; respiratory devices; and protective shields and barriers shall be provided and used. Businesses do not have to supply each employee with all PPE. However, the PPE required to help ensure against the hazard must be available for use at the site where injury is most likely to occur.” Workman's Comp statistics indicate that one of the highest incidents of injury in our type of industry is a foreign object in the eye. This results in a national average price of \$886 per emergency room visit. It is estimated that at least 88 percent of all injuries of this nature could be prevented by the use of safety glasses. It is recommended that all shop employees be supplied with safety glasses to be worn at all times while in the work area. Items that are required to be worn but that do not have to be supplied by the company are safety shoes and prescription safety glasses. However, you are required to provide safety goggles that fit comfortably over the prescription glasses of those affected employees. All employees in freight areas require foot protection.

Respirators Not Properly Stored

“Respirators shall be regularly cleaned and disinfected, and shall be inspected during cleaning. Deteriorating parts shall be replaced. Respirators for emergency use shall be inspected at least once a month and after each use. When not in use, respirators shall be stored in a convenient, clean, and sanitary location.” Store in airtight plastic bags when not in use.

Painters (& Spray Glue Users) Need Respirator Fit Tested

“For safe use of any respirator, it is essential that the user be properly instructed in its selection, use, and maintenance. Both supervisors and workers shall be so instructed by competent persons. Training shall provide employees an opportunity to handle the respirator, have it fitted properly, test its face-piece-to-face seal, wear it in normal air for a long familiarity period, and, finally, to wear it in a test atmosphere.”

Medical Evaluation

“Persons using respirators shall not be assigned to tasks requiring the use of respirators unless they are physically able to perform the work and use the equipment. Medical evaluations must be maintained in employee medical file.” These must be updated annually and results posted and put in employee medical file.

Work Area Not Properly Ventilated

“Ventilating and exhaust system shall be in accordance with the Standard for Blower and Exhaust Systems for Vapor Removal, NFPA No. 91-1961, where applicable and shall also conform to the provisions of this section. All spraying areas shall be provided with mechanical ventilation adequate to remove flammable vapor, mists, or powders to a safe location and to confine and control combustible residues so that life is not endangered. Mechanical ventilation shall be kept in operation at all times while spraying operations are being conducted and for a sufficient time thereafter to allow vapors from drying coated articles and drying finishing material residue to be exhausted. Independent exhaust: Each spray booth shall have an independent exhaust duct system discharging to

the exterior of the building, except that multiple cabinet spray booths in which identical spray finishing material is used with a combined frontal area of not more than 18 square feet may have a common exhaust. If more than one fan serves one booth, all fans shall be so interconnected that one fan cannot operate without all fans being operated.” Please note that paint gun cleaners must be vented to the outside.

Light(s) Not Equipped With Safety Guards

“Electrical wiring and equipment subject to deposits of combustible residues must be of the explosion-proof type.” This is required in all paint and body shop areas.

Sealed, Safety Outlet(s)

“Electrical wiring and equipment subject to deposits of combustible residues must be of the explosion-proof type.” This is also required in all paint and body shop areas.

Flammable(s) Not Stored in Proper Storage Cabinet

“Flammable liquids shall be kept in covered containers or tanks when not actually in use. The quantity of flammable or combustible liquid that may be located outside of an inside storage room or storage cabinet in any one fire area of a building shall not exceed: 25 gallons of Class IA liquid in containers. Adequate precautions shall be taken to prevent the ignition of flammable vapors. Keep flammable liquids away from all sources of ignition. The quantity of flammable or combustible liquids kept near the spraying operations may not exceed the supply for one day or one shift. Class I liquids shall not be dispensed into containers unless the nozzle and containers are electrically interconnected.” ■

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