

## Summary of the Most Common Programs Required by the OSHA Standards

OSHA standards require the programs/forms below. Please note the discussion of each program is brief. We advise not to develop a specific program based on these descriptions. For complete and detailed program requirements, obtain a copy of the OSHA Construction or General Industry Standards.

- **Bloodborne pathogen exposure program** (OSHA 29 CFR 1910.1030): If the potential exists for employee exposure to blood or other body fluids in the course of normal duties, the company is required to implement a program to deal with this exposure. This program includes a written exposure control plan, employee training, personal protective equipment, laundry controls, engineering controls and waste disposal procedures. Included in the program are site first aid team members.
- **Confined space entry** (OSHA 29 CFR 1910.146): Employers are required to assess their facilities and work sites to determine if there are any confined spaces. Confined spaces must then be evaluated to determine if they are permit-required confined spaces. A formal plan must be developed for entry and rescue. No employee shall be required to enter any permit-required confined space unless a written confined space entry procedure is developed and implemented.
- **Crane/Hoisting inspection program** (OSHA 29 CFR 1910.179, 184 or 1926.251, 550, 552): Program consists primarily of documented inspections of equipment. Employees are to be trained in proper inspection techniques in order to identify potential hazards. Depending upon equipment and use, inspections may be daily, monthly or from one to 12 months. Assistance can be obtained from the equipment manufacturer or commercial crane inspection companies.
- **Electrical safety-related work practices program** (OSHA 29 CFR 1910.331 - 335 and 399): Training must be provided to employees whose work might expose them to a risk of electrical shock while working on or near to exposed live parts or other electrical equipment. The content of the training shall include all work practices addressed in the standard. Also, written lockout/tagout procedures must be provided for work on the electrical systems.
- **Emergency action plan** (OSHA 29 CFR 1926.35/150 or 1910.38): The Emergency Action Plan shall be written (oral if 10 or fewer employees) and include: 1) emergency escape procedures, 2) operation of critical operations, 3) accounting procedures for all employees, and 4) rescue duties.
- **Trenching and excavations** (OSHA 29 CFR 1926.651 and 652): It is important, before beginning the job, for the contractor to establish and maintain an excavation plan for the work site that provides adequate systematic policies, procedures, and practices to protect employees from, and allow them to recognize, excavations safety and health hazards.

- **Fire prevention plan** (OSHA 29 CFR 1926.24 & 1910.39): Shall be written (oral if 10 or fewer employees) and include; 1) a list of major workplace fire hazards, and 2) names of personnel responsible for maintenance of fire control and prevention equipment. For both plans, employees **shall** be appropriately trained.
- **Fall Protection Program** (OSHA 29 CFR 1926 Subpart M): Required for all construction related activities as defined in Subpart M of CFR 1926. A written plan is required and should include the following key elements; 1) Conduct Fall Hazard Assessment, 2) Establish Policy and Develop Procedures, 3) Determine Appropriate Hazard Control Measures, 4) Elimination/Engineering Controls, 5) Selection and use of Applicable Systems, 6) Orientation and Training, 7) Inspection and Maintenance, 8) Program Audit.
- **First aid** (OSHA 29 CFR 1910.151 or 1926.50): Trained, designated first-aid responders must be provided at each work location that is not in "near proximity" to medical assistance. Near proximity would be a response time of five minutes or less for local EMS.
- **General Safety and Health Provisions** (OSHA 29 CFR 1926.20): These are the key major elements to a good general safety and health program 1) Management Commitment and Employee Involvement, 2) Work site Analysis, 3) Hazard Prevention and Control, 4) Safety and Health Training.
- Hazard communication program (OSHA 29 CFR 1926.59 or 1910.1200): Each employer is required to develop a written Hazard Communication (HAZCOM) program to include: 1) an inventory of all hazardous chemicals in the workplace, 2) labeling, tagging, or marking each container of hazardous chemical, 3) employee training on the hazards from these chemicals, 4) maintenance of Material Safety Data Sheets (MSDS's).
- **Hearing Conservation Program** (OSHA 29 CFR 1910.95 or 1926.101): Occupational noise levels must be evaluated to determine if a hazard exists and if so, what controls must be implemented. If noise levels exceed OSHA standards, then a formal Hearing Conservation Program must be established, to include: 1) noise monitoring, 2) employee training, and 3) periodic hearing examinations.
- **Hot work program** (OSHA 29 CFR 1910.106, 119, and 252): A Hot Work Program is required when hot work, such as welding or cutting, use of spark-producing powered tools, chipping operations, etc., is performed in an area where combustibles, flammables, or gasses may be ignited. Prior to hot work, an authorized person must inspect the area to determine: 1) need and feasibility, 2) fire or explosive hazards, and 3) control measures. A written permit should be issued identifying: 1) the scope of work performed, 2) precautions to be take, and 3) any follow-up upon completion of the work.
- **Laboratory chemical safety** (OSHA 29 CFR 1910.1450): Established if facility has laboratory facilities using hazardous chemicals (Example: Production plant having a quality control testing lab). Not required if laboratory only uses commercially

prepared kits or dip-and-read testing. Plan requires a written chemical hygiene plan, employee monitoring, medical surveillance, hazard identification and recordkeeping.

- **Lockout/Tagout program** (OSHA 29 CFR 1910.147, 333 and/or 1926.417): required for the servicing, cleaning and maintenance of machines and equipment in which the unexpected startup or energization (turning the power back on) or release of stored energy (power press at top of cycle) could cause injury to employees. Under this program, all possible sources of energy must be identified and secured (locked out/off) and / or tagged to warn other employees why the equipment is turned off.
- **Machine Guarding** (OSHA 29 CFR 1910 Subpart O): This subpart of the OSHA Standard requires guarding of all dangerous moving parts in three basic areas:
  1. *The point of operation*: that point where work is performed on the material, such as cutting, shaping, boring, or forming of stock;
  2. *Power transmission apparatus*: all components of the mechanical system that transmit energy to the part of the machine performing the work. These components include flywheels, pulleys, belts, connecting rods, couplings, cams, spindles, chains, cranks, and gears;
  3. *Other moving parts*: all parts of the machine which moves while the machine is working. These can include reciprocating, rotating, and transverse moving parts, as well as feed mechanisms and auxiliary parts of the machine.
- **OSHA Recordkeeping** (OSHA 29 CFR 1904): Records must be maintained for 5 years previous to the current year and must be available in the establishment for inspection. Under OSHA, only employers with more than 10 employees are required to maintain these records. There are some exemptions to this law. Under House Bill 308, all public employers are required to maintain the forms, regardless of number of employees and form 300A must be submitted every year. The following is a list of OSHA Recordkeeping forms;
  - **OSHA form 300**: "Log of Work-Related Injuries and Illnesses". Used to record every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
  - **OSHA form 300A**: "Summary of Work-Related Injuries and Illnesses". Used to summarize the statistical data gathered with form 300. This form must be posted from February 1 to April 30 of the year following the year covered by the form.
  - **OSHA form 301**: "Injuries and Illnesses Incident Report". This form is one of the first forms you must fill out when a recordable work related injury or illness has occurred. It is used to provide detailed information on injuries and illnesses, how they occurred, etc. This form is the basis for the information filled out on the OSHA Form 300.
- **Personal Protective Equipment** (OSHA 29 CFR 1910.132 & 1926 Subpart E): Each employer is required to perform and document a hazard assessment of the workplace to determine if hazards exist that make the use of personal protective equipment (PPE) necessary. If so, appropriate PPE must be selected. Training is required and includes:

1) when the PPE is necessary, 2) what PPE is required, 3) how to use the PPE, 4) the limitations of PPE, and 5) proper care and maintenance of the PPE.

- **Powered Industrial Truck Operator Training** (OSHA 29 CFR 1910.178 & 1926.602(d)): Employers shall ensure that each powered industrial truck operator is competent to operate a powered industrial truck safely, as demonstrated by completion of training and evaluation. Training elements include: 1) formal instruction, 2) demonstrations performed by the trainer, 3) practical exercises performed by the trainee, and 4) evaluation of the operator's performance in the workplace. Training program content shall include: 1) truck-related topics, 2) workplace-related topics, and 3) specific requirements spelled out in the standard.
- **Respiratory protection program** (OSHA 29 CFR 1910.134 or 1926.103: For the use of respiratory protection, it is required that either initial air monitoring or a reasonable estimate of exposure be made to determine the need for such protection. If respiratory protection is required (because of an over-exposure or employer requirements), then a formal, written nine step respiratory protection program is required. Items to be included in such a program are: 1) procedures for selecting respirators, 2) medical evaluations, 3) fit testing procedures, 4) procedures for proper use in routine and reasonably expected emergencies, 5) procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding and otherwise maintaining respirators, 6) ensuring adequate air quality for supplied air respirators, 7) employee training relative to the hazards to which they are exposed, 8) employee training relative to the proper use of respirators, including putting them on, and 9) procedures for regularly evaluating the effectiveness of the program.
- **Safety training and education** (OSHA 29 CFR 1926.21): It is strongly recommended that you create a written safety training program.
- **Spill response plans** (OSHA 29 CFR 1910.120): Required for all operations where there is a reasonable expectation of emergency response operations for the release of, or substantial threat of release of, hazardous substances (e.g. storage tanks of chlorine, paints, solvents, pesticides, herbicides, etc.). A written plan is required identifying: 1) the hazards involved, 2) evaluation of the hazards, 3) control of the hazards, 4) emergency response actions, 5) clean-up, and 6) decontamination procedures.

### **Additional programs/policies training**

Following are some additional programs and policies that companies should consider when developing their health and safety programs. A thorough job safety analysis (JSA) to identify all potential health and safety concerns is imperative in order to insure all employees are properly trained and protected.

- **Operating procedures for each piece of equipment**  
Specific operating procedures should be established for each piece of equipment used by the company. Employees should be trained using these operating procedures to ensure consistency of training.
- **Heat stress/cold stress**

Certain occupations may require very specific employee training, equipment, and procedures to prevent either heat stress or cold stress on the employees. Such occupations may include construction, meat packing, foundry, landscaping, etc. The employer is required to evaluate any potential hazards (including heat and cold) and develop procedures to protect their employees.

- **Radiation (ionizing, non-ionizing)**

This area may include the use of lasers on construction sites, employees repairing scanning equipment, medical/dental X-rays, ultraviolet radiation (sun) for workers outside, and radar/communication equipment.

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