

INdiana Labor

Insider

2019 July - September

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BASICS**

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Indiana Labor Insider
FALL 2019 EDITION

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**A Letter From
Commissioner Rick J. Ruble**

Welcome to the *Indiana Labor Insider* 2019 fall edition! On behalf of the Indiana Department of Labor, we present our quarterly publication that we hope will offer beneficial information and important dates for all working Hoosiers!

In this special edition of our newsletter, we're going **back to basics**. Our staff members have provided some technical articles and expertise about several vital safety and health topics: hearing conservation (4), respiratory protection (8), bloodborne pathogens (6), and hazard communication (10). Our hopes are that these fundamentals and program-starters will help employers looking to overhaul or enhance their occupational safety and health compliance in their workplaces.

With summer behind us, it's never too early to get a jumpstart on winter preparations. Many Hoosier employers will need to ready outdoor labor hazard controls for the icy season. At minimum, it's a great time for all motorists to do seasonal maintenance and preparation—a great method of helping prevent slides and accidents.

Additionally, we are excited to announce that registration is now open for the 2020 Indiana Safety and Health Conference & Expo! The annual event will be held at the Indiana Convention Center in downtown Indianapolis from February 24-26, 2020. The event will feature more than 70 educational sessions, networking opportunities, more than 100 exhibitors and sponsors, and more. This year, we're keeping a "Focus On Safety!" (12)

Finally, I'd like to take this opportunity to remind motorists to keep your attention on the roads this season as road construction and other infrastructure work concludes.

Thank you for your commitment to occupational safety and health. One injury is too many, and we can only keep Hoosier workers safe with your cooperation and integrity to prevent and eliminate dangers.

To your health and wealth,

BACK TO BASICS

HEARING CONSERVATION

CONTRIBUTOR
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According to the Occupational Safety and Health Administration (OSHA), noise-induced hearing loss is the most common occupational hazard for American workers. Hearing loss from noise is slow and painless; a worker can have a disability before they may even notice any symptoms. If you must raise your voice to speak with a person only three feet away, you are in high hazardous noise. Hearing loss is completely preventable.

OSHA's noise standard is based on the **American Conference of Governmental Industrial Hygienist** threshold limit values in effect at that time. The 8-hour time weighted average (TWA) that employees may be exposed to was established at 90 decibels (dB) for the permissible exposure limit (PEL) and an action level was established at 85 dB for an 8-hour TWA.

Determining Noise Levels

The first step in establishing an effective hearing conservation program is determining the noise levels that are present. Noise monitoring is conducted to determine whether employees are being exposed above the action level and the PEL. OSHA requires that employers monitor noise levels to accurately identify employees who may be exposed at or in excess of the action level of 85 dB. Noise monitoring equipment may include noise dosimeters and sound level meters. Noise dosimeters are used to determine an employee's exposure when the sound levels may vary throughout the day. Dosimeters are worn by the employee and the noise exposures are averaged over the time that the employee wears the dosimeter to determine whether the employee is being exposed above the action level and the PEL. Sound level meters take sound level readings at the moment that the meter is being used. Sound level meters may be used when a noise source is fairly constant throughout the work shift and to check sound levels when using a dosimeter.

Hearing Conservation Program Requirements

Once it has been determined that employees are being exposed above the action level of 85 dB, an employer is required by OSHA to develop and implement an effective hearing conservation program.

The following are the main components of a **hearing conservation program**:

- Noise monitoring to identify employees who may be exposed above the action level.
- Baseline audiometric testing is required within 6 months of an employee's exposure above 85 dB and an annual audiogram is required for all employees exposed above 85 dB after the baseline.
- Provide hearing protection for employees exposed above the action level of 85 dB after they've had a baseline audiogram.
- Require employees to wear hearing protection when the employee's exposure exceeds 90 dB for an 8-hour TWA and when employees are exposed above 85 dB and have not yet had a baseline audiogram.
- Conduct annual training on the hazardous effects of excessive occupational noise exposure, the purpose of wearing hearing protection, and the selection, care, and fitting of hearing protection.
- The highest permissible noise exposure for the unprotected ear is 115 dB for 15 minutes/day. Any noise above 140 dB is not permitted.

Extended Workshifts

Many employers require employees to work beyond an 8-hour workshift. When employees work extended workshifts, the action level is reduced according to the hours an employee works. The following table indicated the decibel level that would require that an employer develop and implement a hearing conservation program:

Exposure Time (Hours)	Action Level (dBA)
8	85
9	84.2
10	83.4
12	82.1
16	80

Hearing Protection

- Employer must ensure proper initial fitting.
- Employer must supervise the correct use of hearing protectors.
- Hearing protectors must be replaced as necessary at no cost to employee.
- Hearing protection devices must be cleaned and stored according to the manufacturer's specifications.

BACK TO
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BLOODBORNE PATHOGENS

CONTRIBUTOR
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The Occupational Safety and Health Administration (OSHA) promulgated the **Bloodborne Pathogen standard, 29 CFR 1910.1030**, in December 1991. The standard is designed to protect employees from exposure to blood or other potentially infectious materials (OPIM). Bloodborne pathogens are defined as infectious microorganisms in the human bloodstream that can cause disease.

The Most Common Dangers

Some of the most common bloodborne pathogens are hepatitis B (HBV), hepatitis C (HCV), human immunodeficiency virus (HIV), and Methicillin-resistant Staphylococcus aureus (MRSA). The most common modes of transmission of these pathogens include accidental puncture from contaminated needles, broken glass or other sharp instruments; contact between broken or damaged skin and infected body fluids; contact between mucous membranes and infected body fluids; sexual contact; and sharing of hypodermic needles. It is important to be aware of the modes of exposure and transmission in your environment.

OSHA regulates exposure to bloodborne pathogens and has developed a **Bloodborne Pathogen Exposure Control program**. The strategy requires employers to have an exposure control plan, and employees should know where this plan is located in their place of employment.

Protecting Yourself

You can protect yourself and others by following standard precautions:

- Using Personal Protective Equipment (PPE)
- Using safe-needle devices as specified
- Disposal of sharps and wastes appropriately
- Obtain Hepatitis B vaccination
- Perform proper Hand Hygiene
- Treat all blood and body fluids as infectious with body substance isolation practices

Personal Protective Equipment (PPE)

PPE should be available at any location where contact is possible with blood and/or body fluids. Safety is everyone's responsibility, especially that of each individual in the situation. The majority of bloodborne pathogen exposure occurs because employees do not follow safe work practices. PPE vital to employees at risk of exposure to these pathogens includes, but isn't limited to, gloves, face shields, gowns, masks, and goggles.

Employee Responsibility

- Know what PPE is required for your individual job tasks
- Know how safety mechanisms work on devices before use
- Report failure of any safety device or PPE
- Know how to properly dispose of infectious waste
- Properly dispose of biohazards
- Proper use and disposal of sharps
- Prevent the spread of infection

A Key to Prevention: Hand Hygiene!

According to the World Health Organization the most effective way to prevent the spread of infection is proper hand hygiene.

- Clean hands by rubbing with an alcohol-based formulation for 20-30 seconds if not visibly soiled.
- Wash hands with soap and water for 40-60 seconds if hands are visibly dirty or visibly soiled with blood and/or other body fluid, or after using the toilet.
- If exposure to potential spore-forming pathogens is strongly suspected or proven, handwashing with soap and water is the preferred means.
- Any healthcare worker, caregiver or person involved with direct or indirect patient care needs to be concerned about hand hygiene and should be able to perform it correctly and at the right time.

Additional Information

The INSafe division, a sub-agency of the Indiana Department of Labor, offers onsite consultation services for occupational safety and health. Services include noise sampling, air sampling, training, sample programs, etc. at no cost to employers. To schedule an onsite consultation with INSafe's team of experienced workplace safety and health staff, please visit www.in.gov/dol/insafeconsultation or email insafe@dol.in.gov. INSafe is also happy to field safety and health questions over the phone. To reach an INSafe consultant, you may call (317) 232-2688.

BACK TO BASICS

RESPIRATORY PROTECTION

IT HAPPENED HERE
Lake County

Preventive maintenance was taking place in a permit-required confined space (PRCS) with a nitrogen blanket. To train a new operator, the supervisor donned a full face piece air purifying respirator, although he failed to complete an entry permit and had not received proper training. The supervisor did not understand that the environment inside the PRCS was oxygen-deficient, and entered the PRCS while attendant assigned to keep watch was on lunch. The supervisor was overcome by nitrogen in the PRCS and died of asphyxia.

CONTRIBUTOR
Patricia McIntire
VPP Team Leader (Central)

The Occupational Safety and Health Administration (OSHA) has requirements that employers must consider in evaluating the safety of breathing airborne hazards at work. When necessary, a key aspect of the regulations may involve the OSHA Respiratory Protection Standard 29 CFR 1910.134 (Respiratory Protection.)

What Is Respiratory Protection?

Generally, there are two types of respiratory protection, air purifying and air supplying. Both types are specific to the manufacturer specifications. Air purifying respirators filter out the hazard from the air and include tight fitting half mask, full face respirators and filtering face pieces among other apparatus. Air supplying respirators have uncontaminated air from an independent source such as compressed airline self-contained breathing apparatus. Respiratory protection applies to all occupational airborne exposures to contaminated air where the employee is:

- Exposed to a hazardous level of an airborne contaminant or otherwise required to wear respirators; or
- Permitted to wear respirators.

According to OSHA, an estimated 5 million workers are required to wear respirators in 1.3 million workplaces throughout the United States. Respirators protect workers against insufficient oxygen environments, harmful dusts, fogs, smokes, mists, gases, vapors, and sprays. These hazards may cause cancer, lung impairment, diseases, or death.

Jumping Into the Basics

The first consideration is that the employer needs to evaluate whether respiratory protection is required for the occupational safety of the worker. This may require industrial hygiene sampling of the air for evaluation. If respiratory protection is not required, given the employer hazard assessment of the work, the key aspect is that of voluntary use of respirators (addressed later in this article).

If there is a need for respiratory protection beyond filtering face pieces (dust masks), then the requirement for the respirator program needs significant consideration and planning as one cannot just supply respirators to workers. When there is an airborne hazard (i.e. nuisance dust, oil mist or silica), there are significant requirements of the employer

regarding keeping the air safe to breathe. This includes:

- Where feasible, use of engineering controls for management of the airborne hazard and
- Implementing a respiratory protection program that complies with the respiratory protection standard that includes provision of appropriate respiratory protection & assurance of proper use

Elementally, where respirators are required, there shall be a written program with:

- Worksite specific procedures (likely done in coordination with a job safety analysis and/or Personal Protective Equipment (PPE) Hazard Assessment);
- Worker training on the program (i.e. use, care and maintenance; training on procedures for proper use and maintenance will assure the worker is using the respirator in a safe and healthful manner);
- Information from the manufacturer of the respirator, which may provide details on such use and maintenance;
- Medical evaluations/clearance before respirator use (Professional medical evaluations are necessary to determine whether the user is fit to wear a respirator without adverse health effects);
- Respirator selection procedures (including more than one type and size of respirator appropriate to the hazard exposed; proper selection and, if appropriate, fit testing of tight fitting face pieces will assure that the respirator will provide adequate protection against the contaminants that affect use);
- Fit testing (except dust masks or loose fitting respirators, such as powered air-purifying respirators)

Voluntary Use

Employers who allow their employees to wear respirators on a voluntary basis when not required by OSHA or the employer must implement limited provisions of a respiratory protection program. When a filtering face piece respirator (dust mask) is all that is used, the employee must be provided a copy of 29 CFR 1910.134 Appendix D regard to detailing safety precautions to consider. For all other voluntary users, an additional written respirator program that covers medical fitness and proper maintenance procedures must be implemented besides the required Appendix D. Remember, voluntary use is only permitted when your employer has determined that there is no airborne hazard that requires use of a respirator.

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HAZARD COMMUNICATION

CONTRIBUTOR
Jameson Berry
 INSafe Construction
 Safety Consultant

In 2013, the Occupational Safety and Health Administration (OSHA) began enforcing new regulations regarding hazard communication. Almost all employers in both construction and general industry need to have a comprehensive hazard communication program. Among the changes to a comprehensive hazard communication strategy important for Hoosier employers to take into account, there were several very important changes pertaining to basic **training**. Before any employees are assigned to work, they need to be trained on the following:

Where Hazards Are Present

It doesn't matter whether we are talking about a bag of concrete, hydraulic fluid, gasoline, or industrial cleaner, if employees are exposed to hazardous substances, the employer needs to provide training to the employees about those substances.

Detecting Hazardous Substances

We are talking about smells, sights, physical effects, taste, etc. Maybe a puddle on the floor, corrosion, dust, distinguishable odors, and maybe the container for the substance could all be ways to warn a worker about potential hazardous substances.

The physical and health hazards of substances used or which are present. Information about the physical and health hazards of a substance can be found on the Safety Data Sheet (SDS.) The employer should review the SDSs and understand the hazards associated with each substance. This way, the employer can proactively protect employees from the hazards.

Protection Methods Associated with Hazardous Substances

There may be handling techniques, engineering controls, or personal protective equipment that could protect an employee's wellbeing. Sometimes protection for employees can be provided in the way of ventilation; but maybe employees need a respirator, gloves, facemask, and/or special clothing.










The Labeling System

Each container of a hazardous chemical that is used in or around the work area must be properly labeled with the identity of the hazardous material, the appropriate hazard warnings (pictograms), and the name and address of the manufacturer. Appropriate labels must be on all containers, regardless of size. Containers must be approved and

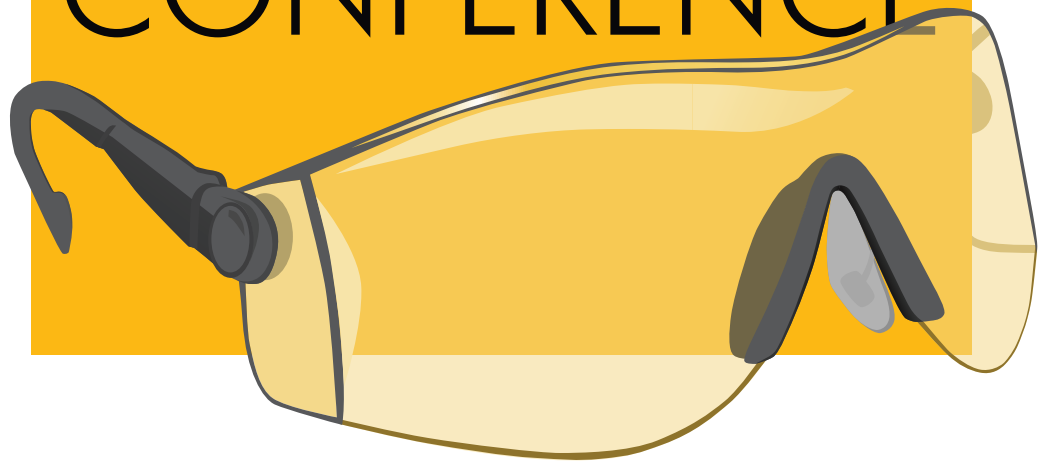
recommended for storage and/or dispensing of the particular hazardous chemicals contained in them. Worn, torn, or illegible labels must be replaced. Containers for materials that will be used within a particular work shift do not require labels. For example, if a painter will be using up the entire contents of a container of paint in one workshift, the paint container does not need to be labeled.

Safety Data Sheets (SDSs)

OSHA adopted the GHS (Globally Harmonized System) for hazardous materials. In doing so, the format for SDSs was standardized and pictograms were added. All SDSs will now have the following pictograms that call attention to the types of hazards associated with the material an employee may be exposed to. Important note: Contract laborers must be made aware of the locations of the Hazardous Chemical List and the SDS information book. They must know what procedures to follow if exposed and what measures to take to minimize exposure.

HEALTH HAZARD Carcinogen Mutagenicity Reproductive Toxicity Respiratory Sensitizer Target Organ Toxicity Aspiration Toxicity		FLAME Flammables Pyrophorics Self-Heating Emits Flammable Gas Self-Reactives Organic Peroxides		EXCLAMATION MARK Irritant (Skin and eye) Skin Sensitizer Acute Toxicity (Harmful) Narcotic Effects Respiratory Tract Irritant Hazardous to Ozone Layer	
GAS CYLINDER Gases Under Pressure		CORROSION Skin Corrosion/Burns Eye Damage Corrosive to Metals		EXPLODING BOMB Explosives Self-Reactives Organic Peroxides	
FLAME OVER CIRCLE Oxidizers		ENVIRONMENT (Non-Mandatory) Aquatic Toxicity		SKULL AND CROSSBONE Acute Toxicity (Fatal or toxic)	

20/20 INDIANA SAFETY & HEALTH CONFERENCE



FOCUS on SAFETY

February 24-26, 2020
Indiana Convention Center, Indianapolis

www.INSafetyConf.com

Join us in November for our annual Best Practice Meetings with our Indiana Voluntary Protection Program (VPP) and Indiana Safety and Health Achievement Recognition Program (INSHARP)! These meetings are open to the public and will provide networking and program-building opportunities to Hoosier businesses statewide!

You're invited!



REGION	LOCATION	DATE
CENTRAL INDIANA	Nucor Steel 4537 Nucor Road Crawfordsville, IN 47933	November 7, 2019
NORTHERN INDIANA	Raytheon 1010 Production Road Fort Wayne, IN 46808	November 13, 2019
SOUTHERN INDIANA	Cintas Uniform Services (134) 7233 Enterprise Park Drive Evansville, IN 47715	November 19, 2019

Please R.S.V.P. to Rebecca Ellson via email at rellson@dol.in.gov.

Frequently Asked Questions Fundamentals of OSHA Compliance

Q: Do OSHA regulations apply to small businesses?

A: Yes, federal Occupational Safety and Health Administration (OSHA) standards apply to employers of all sizes.

Q: What are my rights as an employer under OSHA rules? Or as an employee?

A: Employer rights are located in OSHA publication 3000, *Employer Rights and Responsibilities Following an OSHA Inspection*. Employee rights are located in OSHA publication 3021, *Employee Workplace Rights*. Both documents are available online for download.

Q: How can I get an Indiana OSHA poster?

A: You do not need to purchase an OSHA poster from a third party, you may download the file at www.in.gov/dol/2366.htm. (It will require 8.5x14" paper.) You may also contact the Indiana Department of Labor to request a hard copy by mail.

Q: What's the difference between a formal complaint and an informal complaint?

A: A formal complaint is made by an employee, representative of employees, or a relative of an employee who has provided their written signature. Formal complaints are assigned to an IOSHA compliance officer

to initiate an inspection. An informal complaint can be made anonymously by anyone and doesn't require a signature. Informal complaints will result in a letter to the employer listing possible violations and requiring proof of abatement.

Q: Can an employee refuse to do work that they think is unsafe without being fired?

A: With only a few exceptions such as discrimination or collective bargaining contracts, a Hoosier employer may terminate someone's employment at any time for almost any reason. However, employers are not allowed to terminate an employee engaged in a "protected activity," which includes raising a safety and/or health concern with the employer. The Whistleblower Protection Unit can be reached by calling (317) 234-3946.

Q: What is INSafe and how is it different from IOSHA?

A: INSafe is the consultation and education division of the Indiana Department of Labor. Whereas IOSHA conducts inspections, INSafe services are voluntary and will only occur at the employer's request. INSafe's services are confidential, not public record. INSafe does not penalize an employer for hazards they find. Instead, they work to eliminate hazards and educate employers into compliance.

**We're your partner in
workplace safety and health.**



INSAFE
SAFETY AND HEALTH CONSULTATION
www.in.gov/dol/insafeconsultation

The *Indiana Labor Insider* is a free, electronic newsletter of the Indiana Department of Labor's onsite workplace safety and health consultation division, INSafe.

Learn more about INSafe online at www.in.gov/dol/insafe.htm or email INSafe with questions, suggestions or comments at insafe@dol.in.gov.

Upcoming Safety Training & Seminars

Course	Date(s)	Location	More Information
OSHA General Industry 10-Hour	November 11-12, 2019	Indianapolis	CLICK HERE
OSHA General Industry 30-Hour	November 11-14, 2019	Indianapolis	CLICK HERE
OSHA #510 OSHA Construction	November 19, 2019	Vincennes	CLICK HERE
OSHA #503 Update for General Industry Outreach Trainers	December 10, 2019	Vincennes	CLICK HERE

Additional training and seminar opportunities are listed on the Indiana Department of Labor's website, www.in.gov/dol/2383.htm. If you would like to list your company or organization's training and invite other Hoosier workers, please contact us at insafe@dol.in.gov.

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