2019 VSHE Annual Safety Conference

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Topics to Discuss

• Standards & Information
• Financial Impacts
• Definitions
• Hierarchy of Fall Protection
• Solutions
• Safety & You
• Identify Rooftop Safety Hazards
• Rooftop Safety Program- 3 Step
Who is OSHA

- Occupational
- Safety &
- Health
- Administration

Responsible for protecting workers safety and health
OSHA Most Cited Violations (2018)

1. Fall Protection (1926.501)
2. Hazard Communication (1910.1200)
3. Scaffolding - General Requirements (1926.451)
4. Respiratory Protection (1910.134)
5. Control of Hazardous Energy - Lockout/Tagout (1910.147)
6. Ladders (1926.1053)
7. Powered Industrial Trucks (1910.178)
8. Fall Protection – Training Requirements (1926.503)
10. Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102)
Violations

Fall protection - 8th Straight Year being #1

- 2011-2018
Falls from heights and working surfaces are among the leading causes of serious work-related injuries and deaths. OSHA estimates that, on average, approximately 202,066 serious (lost workday) injuries and 345 fatalities occur annually among workers.
Falls From Heights

OSHA estimates the updates to their new standards will prevent 5,842 injuries and 29 fatalities every year.
The cost for taking safety risks is now more expensive than ever

Fines for violating the regulations set by OSHA continue to increase

Penalties for violating OSHA regulations increased by over 80% from 2015
<table>
<thead>
<tr>
<th>Type of Violation</th>
<th>2015</th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>Serious or other than serious posting requirements</td>
<td>$7,000</td>
<td>$12,471</td>
<td>$12,675</td>
<td>$12,934</td>
<td>$13,260</td>
</tr>
<tr>
<td>Failure to abate or failure to fix and improve beyond initial violation date (per day)</td>
<td>$7,000</td>
<td>$12,471</td>
<td>$12,675</td>
<td>$12,934</td>
<td>$13,260</td>
</tr>
<tr>
<td>Willful or repeat violations</td>
<td>$70,000</td>
<td>$124,709</td>
<td>$126,749</td>
<td>$129,336</td>
<td>$132,598</td>
</tr>
</tbody>
</table>
Details

- **Serious**: Significant chance of injury or death, should have known of hazard and protected employees.

- **Other-than-serious**: Violations do not pose an immediate physical threat. (documents, improper material storage)

- **Failure to Abate**: Issued citation with date by which you must act/correct. Failure to do so is when per day penalty come into play.

- **Willful**: Intentionally violates OSHA regulations or knowingly and willingly puts employees in harm’s way. *Fatal*: $250K (In.), $500K (Corp.), and possible jail time.

- **Repeat**: Already issued a citation within the last 3 years (unless under appeal). Company driven
FALLS COST U.S. EMPLOYEERS- Lost workdays, 6+
$16.1 Billion (BLS 2014)
*Liberty Mutual U.S. Workplace Safety Index, 2017
Example

• **September 2018**

SANDUSKY, Ohio -- The U.S. Department of Labor has issued a $142,270 citation against ---- after inspectors say an employee was “seriously hurt” while working at the amusement park.

“OSHA inspectors determined the injured employee fell through a skylight while working as part of a three-person crew to remove insulating blankets and covers from a roof,”

The company was also cited for its failure to train employees to recognize fall hazards.

The company has 15 days to comply, request an informal conference with OSHA’s area director or contest the findings in front of the OSHA review commission.
Example

- **September 2019**

  Akron, Ohio – Second day on the job a local contractor fell off the 3rd story roof he was repairing, receiving fatal injuries.

  The owner of the Construction failed to provide safety equipment to this individual that could have prevented his fatal fall in November 2017.

  This same owner had two other employees who fell off or through roofs they were repairing. Because of this, the judge said, he knew the danger his employees were in without the required safety equipment.

  He was Sentenced to 3 years in prison, ordered to pay $303,152 in restitution to the worker’s compensation bureau, and is facing a wrongful death lawsuit.
OSHA Basics

• 1910- General Industry Standards
  ◦ 1910.21 Scope and definitions
  ◦ 1910.28 Duty to have fall protection and falling object protection
  ◦ 1910.29 Fall protection systems and falling object protection-criteria and practices
  ◦ 1910.30 Training Requirements
  ◦ (4 feet)

• 1926- Construction Industry Regulations & Standards
  ◦ Subpart M Fall Protection
  ◦ 1926.500 Scope, Application, & Definitions
  ◦ 1926.501 Duty to have fall protection
  ◦ 1926.502 Fall protection systems criteria & practices
  ◦ 1926.503 Training requirements
  ◦ (6 feet)
2017 OSHA Changes (General)

- **OSHA 1910.28 (b)(13)—Work on low-slope roofs**
  - When work is performed **less than 6 feet from the roof edge**, the employer
  - (ii) When work is performed **at least 6 feet but less than 15 feet from the roof**
  - (iii) When work is performed **15 feet or more from the roof edge**, the employer
Infrequent

The task or job is performed only on occasion, when needed, on an occasional basis, or at sporadic or irregular intervals.

A task may be considered infrequent when it is performed once a month, year, or when needed.
2017 OSHA Changes (General)

**Temporary**
The duration of the task the worker performs is brief or short
1-2 hours to complete
Limited to simple task and short term scheduled maintenance or minor repair activities
• 1910.28(b)(13) *Work on low-slope roofs.*

• 1910.28(b)(13)(i) When work is performed less than 6 feet (1.6 m) from the roof edge, the employer must ensure each employee is protected from falling by a guardrail system, safety net system, travel restraint system, or personal fall arrest system.

• 1910.28(b)(13)(ii) When work is performed at least 6 feet (1.6 m) but less than 15 feet (4.6 m) from the roof edge, the employer must ensure each employee is protected from falling by using a guardrail system, safety net system, travel restraint system, or personal fall arrest system. The employer may use a designated area when performing work that is both infrequent and temporary.

• 1910.28(b)(13)(iii) When work is performed 15 feet (4.6 m) or more from the roof edge, the employer must:

  • 1910.28(b)(13)(iii)(A) Protect each employee from falling by a guardrail system, safety net system, travel restraint system, or personal fall arrest system or a designated area. The employer is not required to provide any fall protection, provided the work is both infrequent and temporary; and

  • 1910.28(b)(13)(iii)(B) Implement and enforce a work rule prohibiting employees from going within 15 feet (4.6 m) of the roof edge without using fall protection in accordance with paragraphs (b)(13)(i) and (ii) of this section.
2017 OSHA Changes (General)

1910.28 (B)(9) - FIXED LADDERS (THAT EXTEND MORE THAN 24 FEET (7.3 M) ABOVE A LOWER LEVEL)

- New Ladders - November 19, 2018
- Existing Ladders - November 18, 2036
- Need - Personal Fall Arrest System or a Ladder Safety System
- No Chains Require a Self Closing Gate
Ladder Safety Systems Examples
Definitions

• **Lower levels** - areas or surfaces to which an employee can fall.

• **Unprotected sides & edges** - any side or edge (except at entrances to points of access) of a walking/working surface, e.g., floor, roof, ramp, or runway where there is no wall or guardrail system at least 39” high.

• **Hole** - gap or void in a floor, roof, or other walking/working surface (e.g. skylights, hatches)
Hierarchy of Fall Protection

1. Eliminate Hazards
2. Passive Fall Protection
3. Fall Restraint Systems
4. Fall Arrest Systems
5. Controls
Solutions

- Guard Railing
- Hatch Guards
- Fall Protection Systems
- Skylight Guards
- Crossovers
- Ladders
- Walkways
- Engineered/Attached & Custom
- Warning Lines
Guard Railing
Guard Railing
Attached Guard Railing
Hatch Guard
Skylight Guards
PFA’s
Warning Line
Crossovers
Slip Resistant Walkways
Ladders
Because Safety Affects Us All
Safety Non-Compliance: What are your risk factors or costs to you?

Fiscal and personal responsibilities
- Personal injury or loss of life
- Financial responsibilities/consequences
  - $5.5 Billion annually from falls to a lower level*
- Business relationships
  - Poor safety record affects your business opportunities
- OSHA fines

*Liberty Mutual U.S.Workplace Safety Index, 2017
A team of certified safety professionals available nationwide to provide:

- Evaluation of Rooftop safety hazards
- Compliance solutions for rooftop hazards
- A full line of rooftop safety products
What is Provided?

• **On-Site Safety Inspections**
  • Walk roof section to accurately assess and identify fall hazards

• **Develop Safety Report**
  • Organize information gathered during inspection into an easy to read format
  • Provide Safety Recommendations
  • Products needed for compliance
  • Engineering support if needed
• Fall hazard identified

  • Hatch location exposes employees to fall hazard

  • Open roof hatch is considered a “hole”.
• Fall hazard identified

• Roof access location exposes employees to fall hazard
Fall hazard identified

• Skylights are not rated for fall protection and would be considered a “hole”
Fall hazard identified

- Serviceable roof-top equipment within 6 feet of an unprotected roof edge
Turn-Key Solutions

1. Identify fall hazards
2. Provide safety recommendations
3. Install selected recommendation
Roofing & Building Maintenance

• Let us show you how YOU too can lead with Safety!
• Contact the WTI safety solutions team:
  • SafetySolutions@tremcoinc.com
Questions