

# The Safety & Health Advisor

## Fall 2022



### **Fall Season – Defensive Driving Tips**

Driving during windy and rainy conditions is an added challenge for drivers any time of year. For drivers in New England, these added hazards combined with wet leaf covered streets, wet roads caused by clogged storm drains, and solar glare can make driving even more difficult in the fall. Practicing defensive driving is even more critical to avoid the risk of accidents associated with these hazards.

According to the US Department of Transportation Federal Highway Administration, 75% of weather-related vehicle crashes occur on wet pavement and 47% happen during rainfall. Nearly 5,700 people are killed and more than 544,700 people are injured in crashes on wet pavement annually. Every year, over 3,400 people are killed and over 357,300 people are injured in crashes during rainfall.

Allowing plenty of extra time due to weather, or delaying travel all together due to extreme conditions is a key defensive driving rule to avoid accidents associated with speeding/rushing. Here are several other important tips to keep you safe when driving in the fall.

#### **Get your vehicle ready**

AAA suggests checking and replacing wipers that leave streaks or don't clear the glass in a single swipe. Also make sure all headlights, brake lights and turn signals are working so other drivers will see you during downpours and low light conditions. Turn on your headlights whenever you drive.

Having tires with plenty of tread and are properly inflated is also important for maintaining good traction on wet roadways. Check tread depth with a quarter inserted upside down into the tire groove. If you can see above Washington's head, it's time for new tires. Check each tire's pressure, including the spare, at least once a month when the tires are cold.

#### **Highlights in this Issue**

*Fall Season – Defensive Driving Tips*

*October is Fire Prevention Month!*

*Fire Prevention considerations during Construction*

*OSHA's newest list of Top 10 Violations*

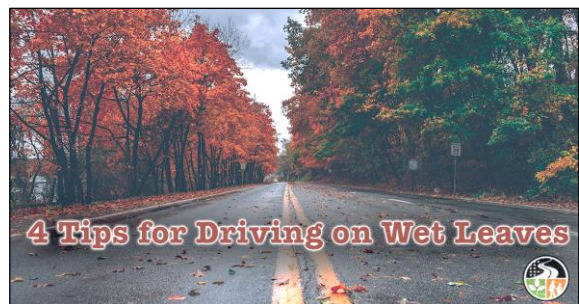
*OSHA Expands Severe Violator Enforcement Program*

<https://exchange.aaa.com/safety/driving-advice/wet-weather-driving-tips/>

Making sure your windshield and other vehicle side and rear windows are cleaned, both inside and out, is also important to reduce the effects of glare, particularly during low light commuting hours. Before starting the engine, clean off any leaves on the windshield, top of the car and hood. Using your vehicles front visor on sunny days, along with wearing sunglasses can also greatly reduce windshield glare, and improve visibility.

#### **Reduce your Speed**

Roadway speed limits are created for optimal conditions, not during heavy wind, rain, or when roads are covered with leaves. If you are driving in these conditions, stay below the speed limit, so you have time to react to any unexpected situations. Slippery leaf covered roads pose an even greater threat on winding roads or during abrupt turns, making it even more important to leave yourself additional stopping distance. The National Highway Safety Administration offers some additional tips when driving on wet leaf covered roadways.



<https://nationalhighwaysafetyadministration.com/e2/fo-ur-tips-for-driving-on-wet-leaves>

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Even defensive drivers can experience skids. If the vehicle begins to skid, it's important to not panic and follow these basic steps:

- Continue to look and steer in the direction in which you want the car to go.
- Avoid aggressive steering and braking maneuvers such as slamming on the brakes, as this can make the skid even worse.
- As your vehicle straightens out, you'll need to adjust your steering again.

Allowing extra stopping time between you and the vehicle in front of you will go a long way to help avoid the risk of being in a skid.

Remember that defensive driving includes watching the road, observing the car in front of you, and continuously scanning your surroundings by keeping your eyes moving.

Finally, avoid driving distractions, and if you need to take a call or complete other tasks that take your focus off driving, pull over in a safe location first (or wait until you've arrived at your destination and safely parked).

### Workplace Fire Prevention

October is Fire Prevention Week/Month and 2022 is the 100<sup>th</sup> anniversary of this event. This year's NFPA (National Fire Protection Association) theme is "Fire Won't Wait, Plan Your Escape!™". This is a good time for organizations to review their fire procedures, including evacuation.



The review should begin with fire prevention practices. Many practices can be applied to the home environment as well. Organizations that have a safety or Joint Loss Management committee may want those individuals to facilitate an employee education or awareness campaign on this topic or participate in facility safety inspections to include fire prevention and fire response.

First, the work environment needs to be evaluated for potential fire risks. Those risks will vary depending on whether you are a manufacturer, warehouse, healthcare facility, restaurant, office or a construction site.

Understanding the setting can help with identification of risks and the implementation of fire prevention measures to address them.



Some common fire hazards in the workplace may include:

- Cooking areas (i.e. kitchens, kitchenettes)
- Smoking materials
- Open flames (i.e. candles/incense)
- Electrical hazards (i.e. wiring/overloaded electrical outlets, damaged extension cords, appliances and equipment)
- Accumulation of combustible materials (i.e. papers, boxes, oily rags)
- Improper handling and storage of combustible/flammable liquids or gases
- Use of Halogen lamps
- Space heaters – *see the information link below*

<https://www.nfpa.org/-/media/Files/Public-Education/Resources/Safety-tip-sheets/PortableHeaterSafety.ashx>

- Hot work hazards (i.e., cutting, welding) – *May also require a trained fire watch*

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OSHA Standard 1910.39 – Fire Prevention Plans: While only required for employers in specific circumstances, this may be a good resource for employers to review during evaluation of the workplace. The recommended items include the following.

- List all major fire hazards, proper handling and storage procedures for hazardous materials, potential ignition sources and their control, and the type of fire protection equipment necessary to control each major hazard;
- Procedures to control accumulations of flammable and combustible waste materials;
- Procedures for regular maintenance of safeguards installed on heat-producing equipment to prevent the accidental ignition of combustible materials;
- The name or job title of employees responsible for maintaining equipment to prevent or control sources of ignition or fires; and
- The name or job title of employees responsible for the control of fuel source hazards.

OSHA provides a safety and health topics webpage about fire safety at:

<https://www.osha.gov/SLTC/firesafety/>

The NFPA also provides some free resource material (including educational tips) at:

<https://www.nfpa.org/Public-Education>

Members of the National Safety Council (NSC) have access to additional materials at:

[https://www.nsc.org/hidden-pages/member-newsletters/safety-spotlight?utm\\_source=sfmc&utm\\_medium=email&utm\\_campaign=MBR%20792638%20-%20Safety%20Spotlight%20Monthly%20OCT&utm\\_content=](https://www.nsc.org/hidden-pages/member-newsletters/safety-spotlight?utm_source=sfmc&utm_medium=email&utm_campaign=MBR%20792638%20-%20Safety%20Spotlight%20Monthly%20OCT&utm_content=)

### Fire Prevention during Construction

The consequences of construction fires can be devastating. Whether you're completing a home renovation or commercial project, don't let your work go up in smoke before it's finished.

All contractors and workers onsite should be aware of all potential fire hazards. Creating accountability and following fire prevention plans can help mitigate the potential for combustion. Here are 10 simple fire safety tips to keep in mind while working onsite:

1. **Keep the Site Clear:** Many flammable and combustible materials on construction sites like packaging, pallets, solvents, or paints are a perfect source of fuel for fires. Safely store products and supplies away from heat-generating equipment such as furnaces, water heaters, or portable heaters or areas hot work is being performed.
2. **Plan for Waste:** Excess materials, wood shavings, and flammable liquids should be removed daily. Discard oily rags properly to avoid risk of spontaneous fires especially in warm conditions. They should be dried outdoors then discarded in a covered metal container in a water or detergent based solution. Store them in a cool place away from heat sources.
3. **Safe electrics:** Electrical systems must only be installed by a competent electrician and should be regularly maintained. Don't forget about portable electrical equipment, which can easily be damaged during construction work due to trailing cables and heavy use. Visually check equipment for faults or damage before use as well as electrical cords.
4. **Beware of heaters:** Temporary heaters must be properly placed in a safe position. Heaters should not be left on while unoccupied and should be kept away from combustible materials. Space heaters account for 43% of U.S. home heating fires, according to the (NFPA).
5. **Initiate a no smoking policy:** Many fires can start accidentally, rather than intentionally, by something as simple as a discarded cigarette end. Smoking is the single most common cause of fire-related fatalities. This also applies to e-cigarettes and vaping devices. Smoking should be carefully controlled and confined to a designated area, on or off-site.
6. **Fire checks:** Performing regular walkthroughs of the facility to check for smoldering, hot equipment and stray sparks can help prevent workplace fires.

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Stop hot work at least 1 hour before the end of the shift, with fire checks at 30-minute intervals and up to and including 1 hour after completion of the work.

7. **Equipment check.** Make sure firefighting equipment is readily accessible, such as: fire extinguishers, hoses, hydrants and emergency water tanks. Ensure employees have been trained on proper use of fire extinguishers including types.
8. **Follow gas cylinder safety protocols.** If gas cylinders are being handled, ensure that they are safely secured in an upright position and fitted with a regulator and flashback arrester.
9. **Implement “hot work” guidelines.** Hot work involves working with ignition sources near flammable materials, such as welding, soldering and cutting. Ensure that all hot work completed has required permits to ensure the risk is adequately controlled. MA State Fire Code training and permit requirements for welding, cutting, and hot work:  
<https://www.mass.gov/service-details/welding-cutting-other-hot-works>
10. **Emergency action plan implementation:** Determine specific exit routes and persons in charge of essential duties such as: fire prevention, responding to a fire, and training. It is important to ensure everything possible is done to first get everyone in the area to a designated safe location, and second, protect the facility and surrounding environment.

### **Lessons from the Triangle Shirtwaist Factory Fire**

*OSHA requirements for multiple exits, unblocked doors, clear pathways and fire extinguishing equipment are in effect today in part because of the tragedy at the [Triangle Shirtwaist Company](#).*

*When fire erupted at that New York City factory back in 1911, lack of water, locked doors and inadequate fire escapes trapped workers inside and led to 146 deaths. Injuries and deaths from fires still happen, but the numbers have been reduced thanks to OSHA and NFPA guidelines.*

### **OSHA Expands Severe Violator Enforcement Program**

The Department of Labor recently updated the criteria for OSHA’s Severe Violator Enforcement Program (SVEP), expanding it to include violations of all hazards and standards across all industries. OSHA estimates it SVEP — which concentrates inspections on employers who have several willful, repeated or failure-to-abate violations — includes roughly 500 employers currently. Doug Parker, OSHA assistant secretary, estimated the changes would add 80 to 100 employers to the list each year, though he didn’t specify which industries they would come from.

According to OSHA, the updated criteria will include:

- Employers with at least two (2) willful or repeated violations will be put on the list, as well as those who receive failure-to-abate notices for high-gravity, serious violations.
- Follow-up inspections made one year — but not longer than two years — after the final order. When a review committee affirms the citation and issues the final order, it obligates the employer to abate the citation.
- Potential removal from the SVEP three years after receiving verification of abatement of hazards. In the past, removal could occur three years after the final order, not abatement.
- Allowing employers the ability to reduce their time on the list to two years — from three — if they consent to an enhanced settlement agreement that includes use of an approved safety management system.

See <https://www.osha.gov/enforcement/svep> for additional details on OSHA’s SVEP. [OSHA INSTRUCTION: CPL 02-00-169 – Severe Violator Enforcement Program \(SVEP\), September 15, 2022](#) ...”updates enforcement policies and procedures for SVEP to focus inspection resources on employers that have demonstrated indifference to their Occupational Safety and Health (OSH) Act obligations by committing willful, repeated, or failure-to-abate violations.”

OSHA made an annual adjustments to its civil penalties back in January with a maximum penalty amount of up to \$145,027 per ‘Willful’ or ‘Repeated’ violation!

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For additional details, see [OSHA Penalties](#) and the memo, [2022 Annual Adjustments to OSHA Civil Penalties \(January 12, 2022\)](#)

### OSHA's Top 10 Citations – FY 2022

OSHA recently released its Top 10 list of most-cited violations covering General Industry (1910) and Construction (1926) standards for the 2022 fiscal year. OSHA's goal of publishing this list is to alert employers about these commonly cited standards so they can take necessary steps to control recognized hazards before an inspector shows up. They show some slight changes from the 2021 FY list.

<u>Citation</u>	<u>Violations</u>
Fall Protection (1926.501)	5,260
Hazard Communication (1910.1200)	2,424
Respiratory Protection (1910.134)	2,185
Ladders (1926.1053)	2,143
Scaffolding (1926.451)	2,058
Lockout/Tagout (1910.147)	1,977
Powered Industrial Trucks (1910.178)	1,749
Fall Protection - Training Req 1926.503)	1,556
PPE - Eye & Face Protection (1926.102)	1,401
Machine Guarding (1910.212)	1,370

Here's a brief look at the Top 3:

#### [1926.501 - Duty to have fall protection](#)

Historically, falls are the leading cause of fatalities in construction, accounting for about one-third of all fatalities in the industry.

Employers must assess the workplace to determine if walking or working surfaces have the necessary strength and structural integrity to safely support workers.

#### [1910.1200 - Hazard Communication](#)

The OSHA Hazard Communication Standard is intended to ensure exposed workers and their employers are informed of the identities of hazardous chemicals, associated health and safety hazards, and appropriate protective measures.

#### [1910.134 - Respiratory protection](#)

OSHA requires employers to develop and implement a written respiratory protection program for situations in which permissible exposure limits (PELs) of airborne contaminants are exceeded, or when the employer or work site requires the use of respirators by employees.

Being prepared for an OSHA inspection is the key! View an **OSHA Inspections Fact Sheet** at <https://www.osha.gov/sites/default/files/publications/factsheet-inspections.pdf>.

*If you need assistance in evaluating your ergonomics or safety and health program, please contact Neal Freedman, John Cotnam, Mark Hickox or Colin Trombley from Atlantic Charter's Safety and Health Department at (617) 488-6500.*