



OSHA 2020
ARE YOUR MARINAS AND
TEAMS PREPARED?

OSHA – MANDATE & OVERSIGHT

OSHA

Established in 1970, **OSHA's** mission:

- Assure safe and healthful working conditions for working men and women.
- Setting and enforcing standards
- Providing training, outreach, education and assistance.

What Triggers a Property Inspection

- Fatalities and workplace catastrophes resulting in worker injury
- Complaints registered by employees
- Referrals from other agencies such as EPA, DEM, ACOE
- Follow-up inspections of OSHA violations
- Planned or programmed investigations of targeted industries

An Investigator Just Arrived On Your Property – Train Your Teams

- Contact the GM or MOD
- Request Investigator Credentials and the Reason for the Visit.
- Investigator must explain the reason behind the inspection.
- IF the GM or MOD is not available, please request the Investigator wait while you locate them. **THIS CANNOT TAKE MORE THAN 1 HOUR.**
- Inspector, accompanied by a member of management, will tour the site to review working conditions and identify violations.
- DO NOT allow the investigator to tour the site SOLO. This is your RIGHT.
- During the Tour, DO NOT COMMENT, PROVIDE PERSONAL THOUGHTS OR APOLOGIZE FOR ANY ISSUES. Simply respond you see the issue they are pointing out and making notes. **NO HUMOR OR JOKING.**
- Upon conclusion of site inspection, inspector will schedule a Closing Conference to Review Findings.

CONSISTENT MARINA SITE VIOLATIONS & FINES

- **Fire Extinguishers / Fire Hoses** – expired inspections, mounting, signs & training.
- **Fire Plans** – Written plans, Staff training.
- **Building Exits** – Unmarked Exits, Signs “ NOT AN EXIT”, Blocked Doorways, Blocked Stairwells
- **Haz Com** – Training, SDS Libraries, Written Plans, Poor Housekeeping & Fire Cabinets
- **Powered Equipment Training** – inspection program lacking, Hazard warning signs, no training, expired training, incorrect training(equipment specific), missing equipment documentation(manuals).
- **OSHA 300 Logs** – program missing, records incomplete.
- **Electrical Panels** – doors & labels missing, open circuits, blocked access & GFCI
- **Machine Guarding** – bench grinder guards, drill press mounting, hydraulic press guard, GFCI
- **PPE** – respirator training, fit testing, respirator hygiene, gloves, eye protection, hard hats (hoisting)
- **Battery Charging** – ventilation, training, eye wash station.
- **Open Flame – NFPA** - grills and heaters on docks. Flammable Structures built by customers.
- **Eye Wash Stations** – not installed, sized incorrectly or expired

FIRE EXTINGUISHERS AND FIRE SAFETY IN BUILDINGS

Fire Extinguishers

- Expired – Not Tagged Out
- Signage and Mounted 3 ½ to 5 feet off the floor
- Easily accessible – not blocked
- FIRE PLAN, TEAM TRAINING AND PRACTICE – LOCAL FD CAN HELP

Fire Safety – Buildings

- IDENTIFY EMERGENCY ESCAPE ROUTES
- BLOCKED ESCAPE ROUTES !
- WHAT'S THE PLAN – WHERE'S THE PLAN – TRAINING - WHO DOES WHAT, GATHER POINTS FOR STAFF.
- FIRE DRILLS WITH YOUR LOCAL FD.
- HAZ MATS ON SITE – LIST FOR FD.

HAZ COM MANAGEMENT IN YOUR MARINA OR BOATYARD ??



HAZCOM -SDS DOCUMENT MANAGEMENT

SDS MANAGEMENT

- IN 2012 OSHA TRANSITIONED FROM THE MSDS FORMAT TO THE SDS FORMAT.
- **MSDS** and **SDS** are **similar** other than GHS compliance in SDS Format.
- SDS Hard Copy Management – Each property needs Responsible Staff to Manage Program on Site.
- SDS Must be Provided ONE TIME by the supplier or **upon request**.
- Right to Know – all employees have the right to inspect the SDS Documents.
- Maintaining Records, Updating and Availability are very important.
- Digital – presents challenges and generally not recommended for the size of MOST operations – Is your staff able to access and present DIGITAL SDS files quickly when an investigator requests to inspect ?

HAZCOM PLAN –

- All employers with hazardous chemicals in their workplaces must prepare and implement a written **hazard communication program**
- All Employers must ensure that all containers are labeled
- Employees must be provided access to SDS sheets, and insure that an effective training **program** is conducted for all potentially exposed employees.
- WHAT IS IN THE PLAN and WHERE IS YOUR HAZ COM PLAN STORED.
- WHO ARE THE RESPONSIBLE STAFF THAT WILL MANAGE THE PLAN, ACTIONS AND ITS CONTENTS.
- MAKE THE REVIEW A PART OF YOUR MONTHLY TEAM MEETING ON EACH SITE.
- HOW DO YOUR TENANTS AND CONTRACTORS MANAGE THEIR PLANS?

POWERED EQUIPMENT OPERATOR TRAINING

Equipment Training

- **OSHA** requires that every **EQUIPMENT** operator be trained and certified to **Operate** the powered industrial truck found in the workplace, and that the **operator's** performance be evaluated on the provisions of 1910.178(l)(3) every three years. ... That is the only **operating "license"** required by **OSHA**.
- Travel Lifts fall under Forklift Operator Training.
- Tractors – training **CERTIFICATION** not required **HOWEVER** Roll Over Bars are.

Driver Safety

- Employers **are** responsible for ensuring that **EQUIPMENT** operators **are wearing seat belts**. If the operator **does not** use **seat belts**, the employer could be cited for failure to comply with OSHA standards which requires companies to protect employees from recognized hazards.
- **ONLY** Trained and Certified **OPERATORS ARE PERMITTED TO** operate equipment.
- Apprentice **OPERATORS CAN ONLY OPERATE EQUIPMENT** when a **CERTIFIED DRIVER** is present **DURING THE MOVEMENT**.
- Back Up Alarms **MUST BE OPERATIONAL**.

Equipment Inspection

- **OSHA REQUIRES** that **ALL POWERED EQUIPMENT be inspected daily WHEN USED**, or after each shift when used around the clock.
- **OSHA does not REQUIRE** that **POWERED EQUIPMENT inspections** be documented –**BUT HARD COPY RECORDS ARE PROOF OF INSPECTIONS AND A BEST MANAGEMENT PRACTICE. RECORD AND FILE INSPECTIONS.**
- **USE LOCK OUT TAG OUT PRACTICES WHEN REQUIRED. TAKE THE KEYS. ADD A TAG.**
- **Digitize Daily Inspections – THERE ARE COMMERCIALY AVAILABLE APPS TO STREAMLINE THIS PROCESS.**

PROPERTY ACCIDENTS AND THE OSHA 300 LOG

Property Accident Reporting to OSHA

- A **recordable** injury or illness under **OSHA** is one that requires medical treatment beyond first aid, as well as one that causes death, days away from work, restricted work or transfer to another job, or loss of consciousness.
- All employers are **required** to notify **OSHA** when an employee is killed on the job or suffers a work-related hospitalization, amputation, or loss of an eye.
- **A fatality must be reported within 8 hours. An in-patient hospitalization, amputation, or eye loss must be reported within 24 hours. Accidents that fall under these guidelines will trigger a site inspection.**

Property Accident Action Steps

- Respond and Treat Injured as required.
- Document Incident Details Photos and Witness Information.
- Do not over record – possibly creates inaccurate assumptions and may result in higher level of inspection.

300 Log Posting and Filing

- Posted between February 1 & April 30 each year.
- The summary must include the total number of job-related injuries and illnesses.
- If a company recorded no injuries or illnesses in 2019, the employer must enter "zero" on the total line.
- The form must be signed and certified by a company executive.
- Form 300A should be displayed in a common area where notices to employees are usually posted.
- Under HIPAA, an employee can request sensitive injury reporting be blocked or deleted from the Log and recorded as anonymous.
- 300 Logs MUST be kept on File for 5 Years.

MACHINE GUARDING-ELECTRICAL SAFETY-HAND TOOLS-PPE

Machine Guarding

- Bench Grinders Missing Guards
- Chop Saws with Wired Guards
- Hydraulic Press with NO Blast Guard
- DON'T NEED IT – SCRAP IT.
- NEED IT - REPLACE UNSAFE JUNK.

Hand Tools

- Pressure Switch Disabled
- Cracked Cases
- Frayed Cords
- No Guards

Electrical Safety

- OPEN CIRCUIT BREAKER SLOTS
- BLOCKED PANELS
- POOR SIGNAGE
- BROKEN OUTLETS – DAMAGED JUNCTION BOXES
- EXTENSION CORDS AND TERMINAL STRIPS

PPE - Personal Protective Equipment

- RESPIRATORY - FULL SEAL RESPIRATORS or Dust Masks
- EYE
- HEARING
- HAND

TOP 10 OSHA SERIOUS VIOLATIONS FINED IN 2018

OSHA defines a “serious” violation as “one in which there is a substantial probability that death or serious physical harm could result, and the employer knew or should have known of the hazard.”

1. Fall Protection (1926.501)
2. Hazard Communication & SDS (1910.1200)
3. Scaffolding - General Requirements (1926.451)
4. Respiratory & PPE (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)
9. Machine Guarding– General Requirement (1910.212)
10. Personal Protective and Lifesaving Equipment – Eye and Face Protection (1926.102)

SUBCONTRACTORS AND TENANTS – PROPERTY RESPONSIBILITY WHAT’S WRONG WITH THIS PICTURE ?



YOUR MARINA IS ULTIMATELY RESPONSIBLE FOR ALL ACCIDENTS RESULTING FROM CONTRACTORS OR TENANT ACTIONS WHILE ON THE PROPERTY.

- **CONSTRUCTION CONTRACTORS WORKING IN UNSAFE MANNER – FALL PROTECTION – HARD HAT – FAULTY EQUIPMENT – HAZ MAT – OPEN HOLES – ELECTRICAL – WELDING**
- **TENANTS CONDUCTING BUSINESS IN UNSAFE MANNER – UNSAFE EQUIPMENT – UNSAFE PRACTICES**
- **UNLICENSED TENANTS OR CONTRACTORS USING MARINA EQUIPMENT – FORKLIFTS – SHOP EQUIPMENT**