

OSHA Updates – What you need to know now and how to stay current:

Cathi L. Marx; ALCM, COSS, COSM, CHPP

**President, Aspen Risk Management Group
April 17, 2018**



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Content Disclaimer

- The information presented is general in nature and is intended to present an overview of employment practices. The written and verbal contents of the presentation are not intended to constitute consulting and/or advice and no client relationship is established between the presenter and attendees.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Polling Question #1

Besides “distracted driving” what is the other “distraction” that is an epidemic?

- a) LED billboards!
- b) Labradoodles (they are so cute)
- c) “Distracted walking”
- d) Starbucks Coffee smell
- e) Springtime!



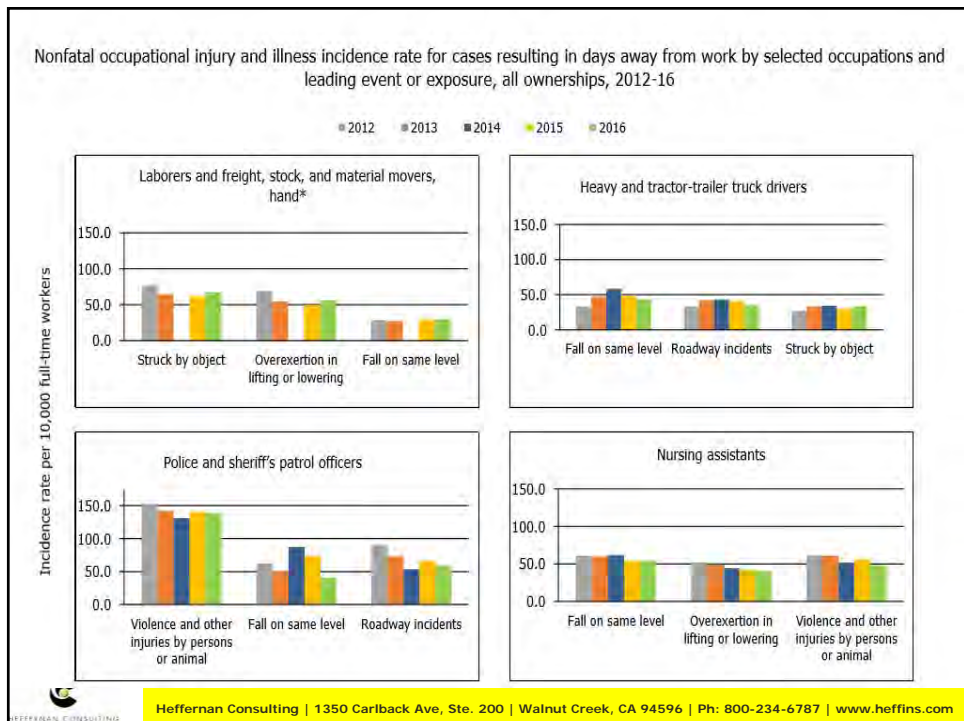
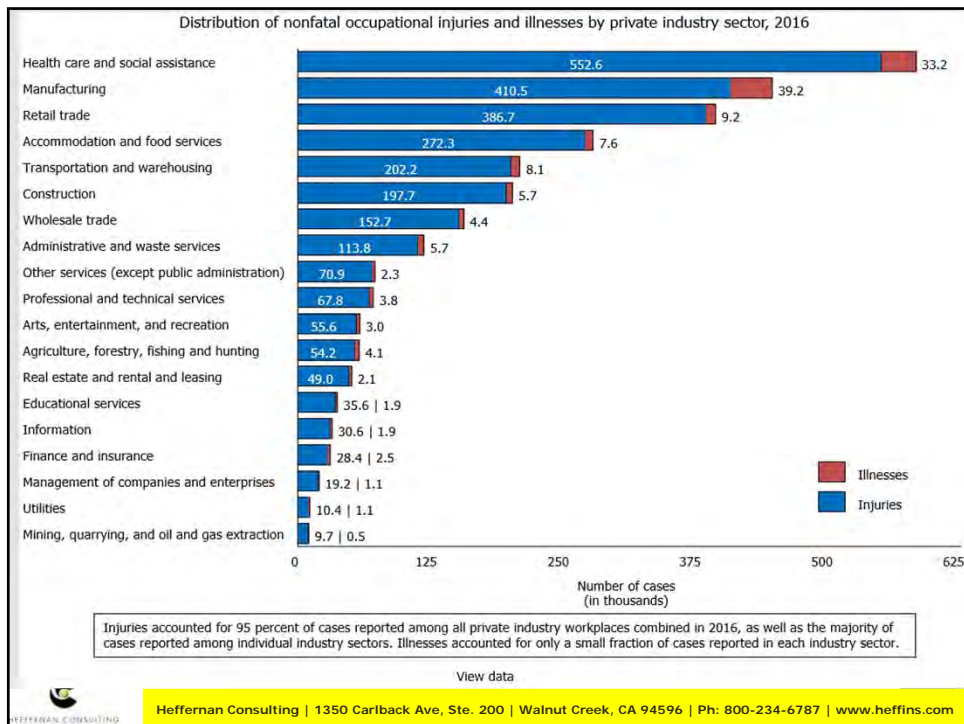
Heffernan Consulting | 1350 Carlbach Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

First Things First...

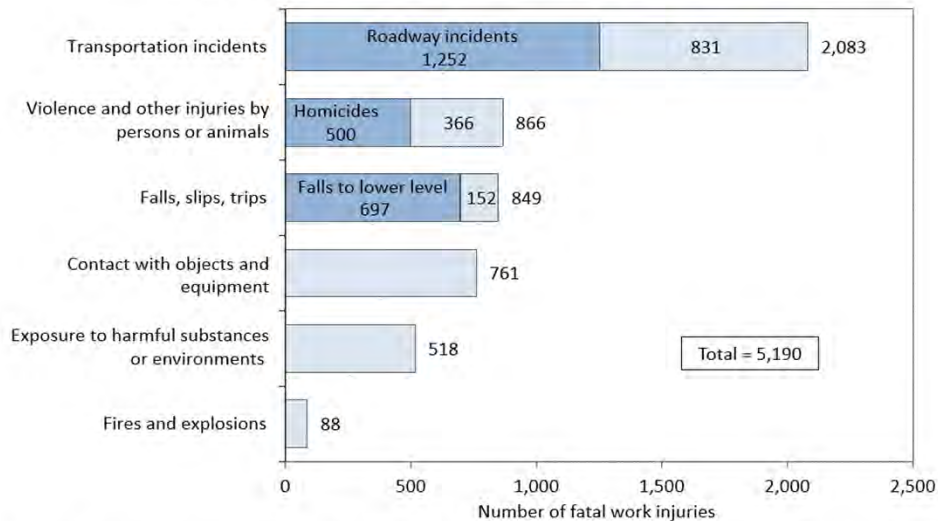
How and why are our employees getting hurt, and why is it important that we know this?



Heffernan Consulting | 1350 Carlbach Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com



Fatal occupational injuries by major event, 2016

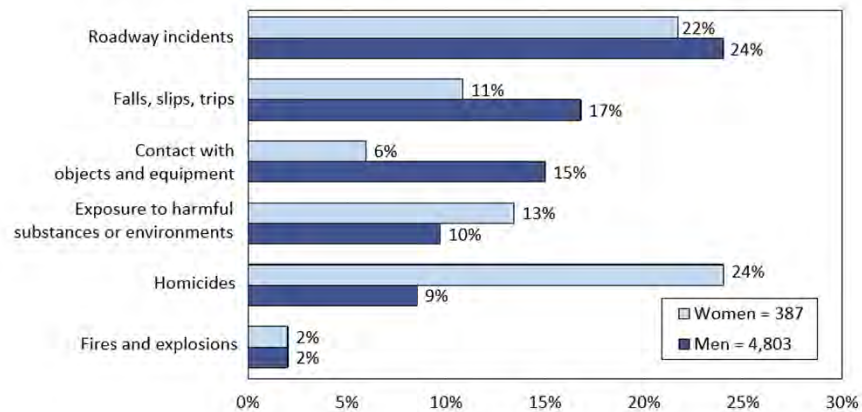


- More fatal work injuries resulted from transportation incidents than from any other event in 2016.
- Roadway incidents alone accounted for about one out of every four fatal work injuries.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Distribution of fatal injury events by gender of worker, 2016

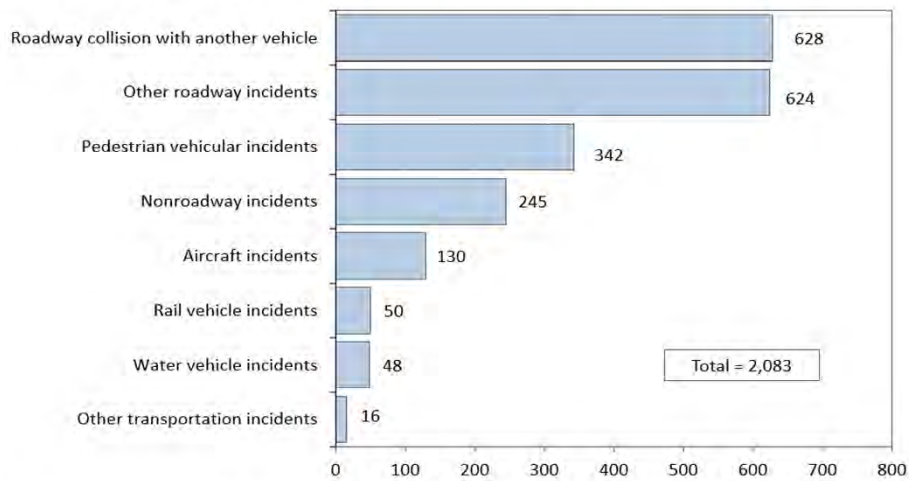


- Women experienced a higher proportion of fatal injuries due to homicides and exposure to harmful substances and environments relative to men.
- Men incurred a higher proportion of injuries from roadway incidents; falls, slips, and trips; and contact with objects and equipment.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Fatal occupational injuries due to transportation incidents, 2016

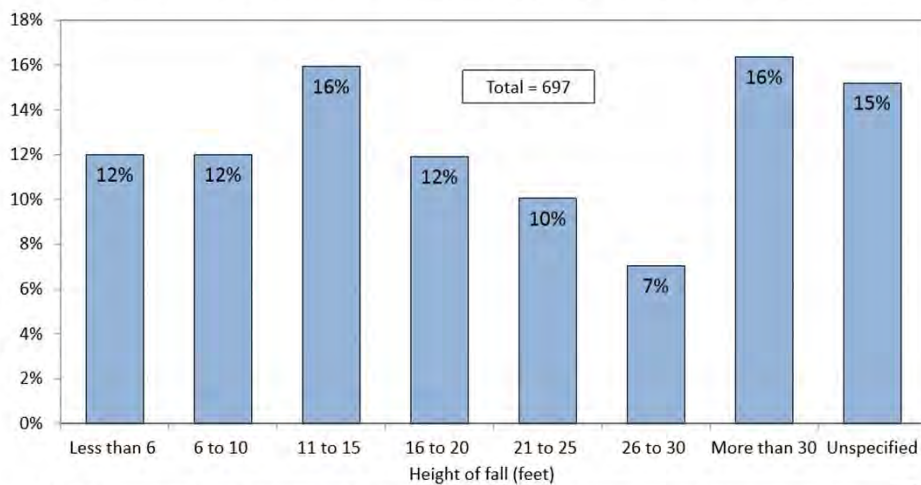


- Transportation incidents increased from 2,054 in 2015 to 2,083 in 2016.
- Together, roadway collisions with another vehicle and other roadway incidents account for about 60 percent of fatal work-related transportation injuries.



Heffernan Consulting | 1350 Carlbach Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Percent of fatal falls to lower level by height of fall, 2016

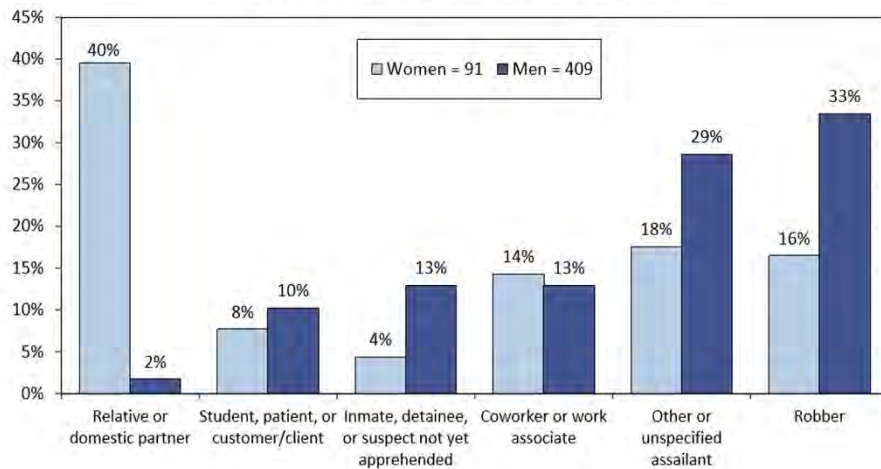


- A total of 697 work-related fatal falls to lower level were recorded in 2016, up 8 percent from 2015.
- Of the cases where height of fall was known (591 cases), 47 percent were falls of 15 feet or less.
- About one in five falls with a known height were from more than 30 feet.



Heffernan Consulting | 1350 Carlbach Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Percent of work-related homicides by gender of decedent and assailant type, 2016

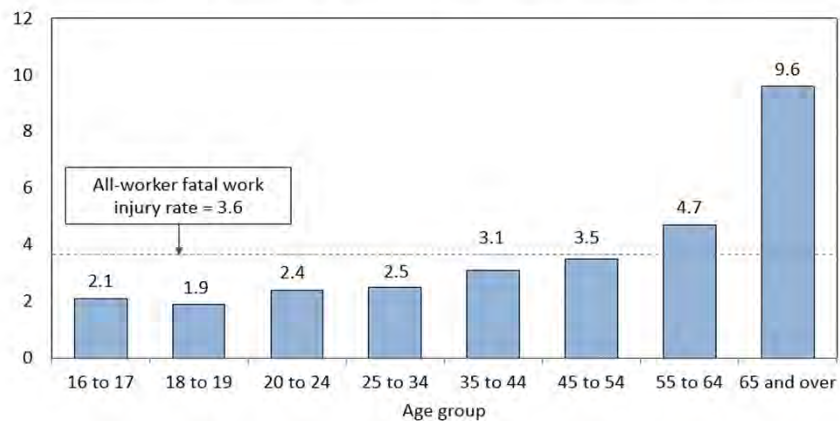


- Relatives or domestic partners were the most frequent assailant in work-related homicides involving women.
- Robbers were the most common work-related homicide assailant for men.



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Rate of fatal work injuries per 100,000 full-time equivalent workers by age group, 2016



- Workers age 65 and over had the highest fatal injury rate of all workers.
- The largest number of fatal work injuries involved workers in the 55 to 64 and 45 to 54 age groups.



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Federal OSHA TOP 10 Most Frequently Cited Regulations 2017



https://www.osha.gov/Top_Ten_Standards.html



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

- Fall protection, construction ([29 CFR 1926.501](#)) [[related OSHA Safety and Health Topics page](#)]
- Hazard communication standard, general industry ([29 CFR 1910.1200](#)) [[related OSHA Safety and Health Topics page](#)]
- Scaffolding, general requirements, construction ([29 CFR 1926.451](#)) [[related OSHA Safety and Health Topics page](#)]
- Respiratory protection, general industry ([29 CFR 1910.134](#)) [[related OSHA Safety and Health Topics page](#)]
- Control of hazardous energy (lockout/tagout), general industry ([29 CFR 1910.147](#)) [[related OSHA Safety and Health Topics page](#)]

OSHA's 2017 Top 10 Most Frequently Cited Violations



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

- Ladders, construction ([29 CFR 1926.1053](#)) [[related OSHA Safety and Health Topics page](#)]
- Powered industrial trucks, general industry ([29 CFR 1910.178](#)) [[related OSHA Safety and Health Topics page](#)]
- Machinery and Machine Guarding, general requirements ([29 CFR 1910.212](#)) [[related OSHA Safety and Health Topics page](#)]
- Fall Protection–Training Requirements ([29 CFR 1926.503](#)) [[related OSHA Safety and Health Topics page](#)]
- Electrical, wiring methods, components and equipment, general industry ([29 CFR 1910.305](#)) [[related OSHA Safety and Health Topics page](#)]

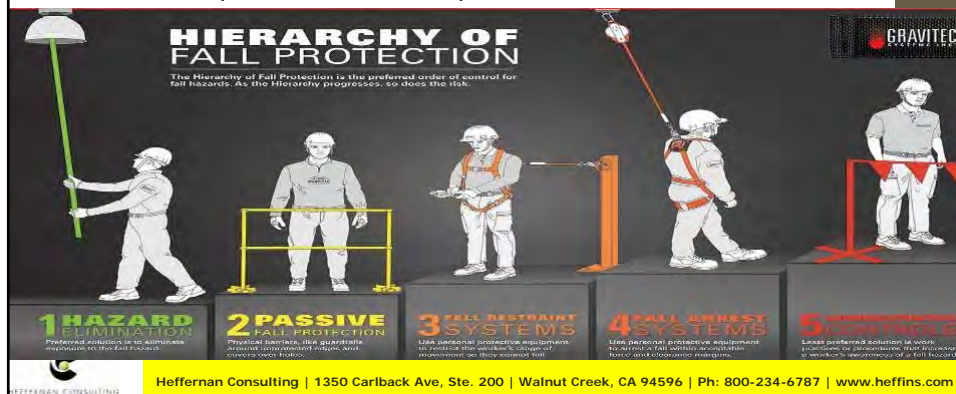
OSHA's 2017 Top 10 Most Frequently Cited Violations



Heffernan Consulting | 1350 Carlsback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

1. Fall Protection Issues:

- Lack of Fall protection
- Failure to provide a guardrail safety net or PFAS
- Lack of Fall protection on low slope roofs; < 4:14
- Failure to guard holes or provide covers (skylights)
- Lack of fall protection on steep roofs: >4:14



Heffernan Consulting | 1350 Carlsback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

2. Hazard Communication

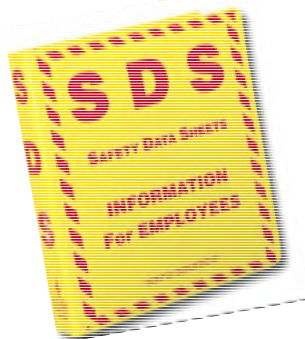
- Global Harmonized System - GHS



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Hazard Communication - Issues

- Failure to develop a written program
- Failure to train employees
- Failure to properly label each container of hazardous
- Failure to obtain SDS for each chemical
- Failure to maintain and update SDS for chemical; and substances



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

GHS Highlights

- Need to be fully implemented by 6/1/2016
- Must have new labels with pictograms
- Label warnings are more specific
- Written program must refer to GHS / SDS / Pictograms



Heffernan Consulting | 1350 Carlsback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffernan.com



3. Scaffold

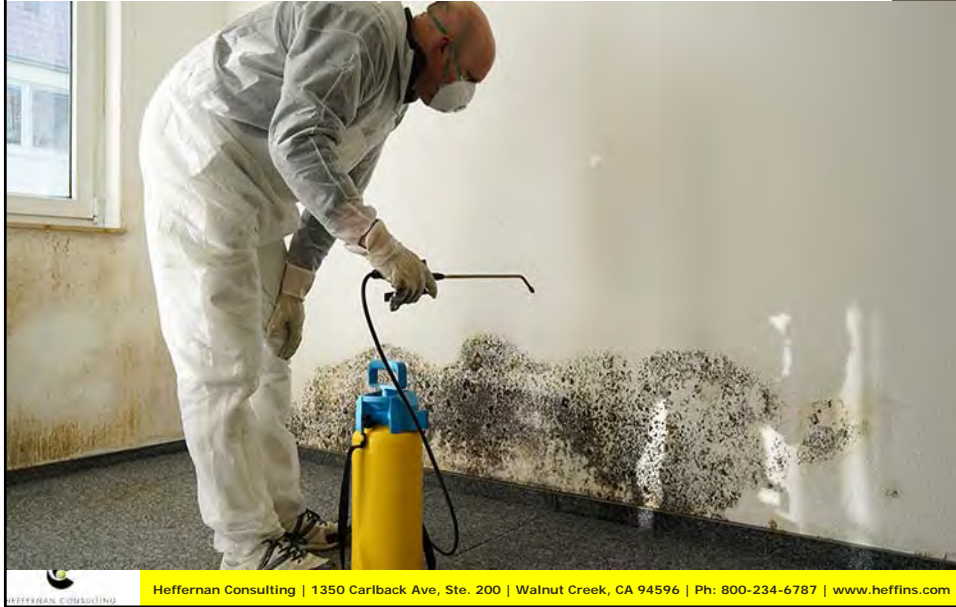


3. Scaffold

- Lack of Fall Protection
- Failure to ensure adequate platform Construction (planking)
- Failure to properly access (ladders or stairs)
- Failure to properly support scaffold
- Failure to install guardrail systems



4. Respiratory Protection



Respiratory Protection

- Lack of a written program
- Failure to perform medical evaluations before use/initial fit testing
- Failure to provide Appendix D when respirator use is voluntary
- Failure to ensure employees using a tight-fitting facepiece respirator pass an initial / annual fit test
- Failure to provide appropriate respirator based upon hazards / exposures



5. Lockout Tag Out



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Lock out Tag Out

- Failure to develop and document equipment-specific lockout procedures
- Failure to conduct periodic (annual) inspections of energy control program
- Lack of a written program
- Failure to train employees in LOTO procedures
- Lack of a written LOTO program
- Failure to properly apply LOTO device or tag



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

6. Ladders



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Ladders

- Failure to extend ladder at least 3 feet above upper landing surface
- Using ladders for the purpose other than which they were designed
- Using the top or top step of a stepladder
- Failure to remove a damaged ladder from service
- Employee carrying an object up or down the ladder, lack of 3 point contact



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

7. Powered Industrial Trucks

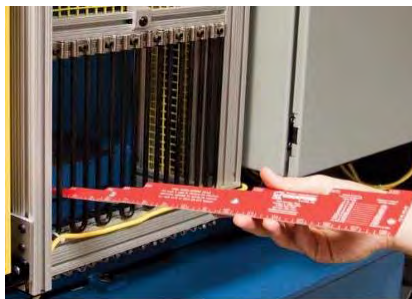
- Failure to ensure operator competency
- Failure to provide refresher training (every three years)
- Lack of operator certification
- Failure to remove defective / unsafe equipment from service
- Failure to perform daily inspection before use



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

8. Machine Guarding – General Requirements

- Failure to guard machinery
- Failure to guard point-of-operation
- Failure to anchor fixed machinery
- Failure to guard exposed blades
- Failure to affix / use guards per manufacturer's instructions



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

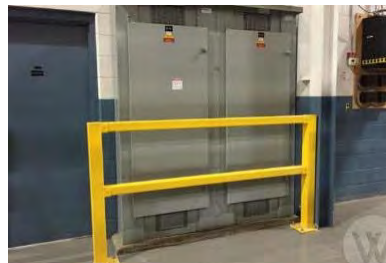
9. Fall Protection Training Requirements

- Failure to develop a training program
- Failure to maintain / document employee training
- Training not provided by a “competent person”
- Employee not knowledgeable in use of fall protection system or equipment
- Fall protection system/equipment not being used



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

10. Electrical Systems



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

10. Electrical Systems: General Requirements

- Failure to use electrical equipment in accordance with manufacturers instructions
- Failure to keep electrical work spaces and panels clear
- Failure to guard live electrical parts and conductors
- Use of electrical equipment containing recognized hazards
- Failure to identify disconnecting means and circuits



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

California Specific



Heffernan Consulting | 1350 Carlback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Twenty-Five Most Frequently Cited T8 CCR Standards in CY 2016

Standard	Description	Total Violations	Serious Violations	Percent Serious
3203	Injury and Illness Prevention Program	2187	171	7.8%
3395	Heat Illness Prevention	2014	240	11.9%
1509	Construction Injury and Illness Prevention Program	1192	69	5.8%
/ 3314	Clean, Repair, Service, Set-up and Adjust Prime Movers, Machinery and Equipment	843	356	42.2%
/ 5194	Hazard Communication	586	15	2.6%
342	Reporting Work-Connected Fatalities and Serious Injuries	547	5	0.9%
/ 5144	Respiratory Protection	432	21	4.9%
6151	Portable Fire Extinguishers	420	1	0.2%
5162	Emergency Eyewash and Shower Equipment	349	129	37.0%
461	Permits to Operate Air Tanks	334	0	0.0%
/ 2340.16	Work Space About Electric Equipment	319	1	0.3%
/ 3276	Portable Ladders	319	97	30.4%
1512	Construction: Emergency Medical Services	285	9	3.2%
/ 3650	Industrial Trucks: General Requirements	275	83	30.2%
/ 3668	Powered Industrial Truck Operator Training	231	26	11.3%
/ 3328	Safe Practices, Personal Protection: Machinery and Equipment	219	77	35.2%
/ 1670	Personal Fall Arrest Systems, Personal Fall Restraint Systems and Positioning Devices	176	129	73.3%
4650	Compressed Gas and Air Cylinders: Storage, Handling, and Use	173	31	17.9%
3400	Medical Services and First Aid	159	3	1.9%
14300.29	Employer Records of Occupational Injury or Illness: Forms	158	0	0.0%
/ 2500.8	Flexible Electrical Cords and Cables: Uses Not Permitted	155	2	1.3%
/ 3210	Guardrails at Elevated Locations	145	84	57.9%
/ 4002	Moving Parts of Machinery or Equipment	142	103	72.5%
1529	Asbestos	141	40	28.4%
/ 3380	Personal Protective Devices	140	20	14.3%

FFY 2016 - 2017 HIGH HAZARD INDUSTRY LIST

Industry Group	NAICS	Industry	DART	Establishments	Employees
Agriculture	1111	Oilseed and grain farming	11.6	719	3328
	112	Vegetable and melon farming	5.0	923	33377
	1121	Animal production and aquaculture	5.6	2585	28140
Construction	23611	Residential building construction	6.5	18311	94369
	23613	Framing contractors	6.1	702	16382
	23814	Masonry contractors	7.4	1185	10455
Manufacturing	3112	Grain and oilseed milling	4.4	91	4198
	3113	Sugar and confectionery product manufacturing	5.0	195	5901
	311423	Dried and dehydrated food manufacturing	4.4	60	3587
	311514	Dry, condensed, and evaporated dairy product manufacturing	4.6	35	1018
	31161	Animal slaughtering and processing	6.1	321	21500
	31183	Tortilla manufacturing	5.0	116	6510
	31199	All other food manufacturing	5.5	269	11633
	31211	Soft drink and ice manufacturing	6.2	180	12369
	321910	Other millwork (including flooring)	4.5	138	2993
	3252	Resin, synthetic rubber, and artificial synthetic fibers and filaments manufacturing	5.3	156	3382
	32739	Other concrete product manufacturing	4.6	125	5023
	3312	Steel product manufacturing from purchased steel	4.7	80	2570
	3314	Nonferrous metal (except aluminum) production and processing	4.5	89	2708
	331511	Iron foundries	4.9	27	775
	331523	Nonferrous metal die-casting foundries	5.8	28	947
	332313	Plate work manufacturing	7.0	100	1402
	332323	Ornamental and architectural metal work manufacturing	6.8	246	3188
	3326	Spring and wire product manufacturing	6.3	135	3069
	33311	Agricultural implement manufacturing	12.7	120	3361
	334514	Totalizing fluid meter and counting device manufacturing	5.8	26	854
	3351	Electric lighting equipment manufacturing	5.3	282	7141
	3352	Household appliance manufacturing	6.6	66	1803
	3366	Ship and boat building	4.5	116	7598
	33711	Wood kitchen cabinet and countertop manufacturing	4.8	799	8716
	3372	Office furniture (including fixtures) manufacturing	5.9	409	7984
	3379	Other furniture related product manufacturing	5.4	144	4201



HEFFINS CONSULTING

Heffins

1

14-6787 | www.heffins.com

Violations as they reflect the increases:

General OSHA Violations: \$12,726 (\$7000)

Serious OSHA Violations: \$18,000 - \$25,000 (\$7,000)

Willful Violations OSHA Violations : \$127,254 (\$70,000)

Repeat Violations OSHA Violations : \$127,254 (\$70,000)

<https://www.dir.ca.gov/title8/336.html>

Serious Repeated or Willful Repeated Violation of Crane Standard, Order, or Special Order Causing Death or Serious Injury - If the employer commits a serious repeated or willful repeated violation of a crane standard, order, or special order, and the Division has determined that the violation caused death or serious injury as defined pursuant to Labor Code 6302, the penalty shall be **\$140,000**. This penalty is not subject to adjustment.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

**Cal/OSHA Health, Safety, and Administrative Rulemaking Updates
March 29, 2018**

Boilers and Fired Pressure Vessel Permitting Fees.

Cal/OSHA and Director's Office staff have prepared an emergency rulemaking package under recent amendments to Labor Code section 7721 to implement permit fee increases. **Cal/OSHA expects to file the emergency rulemaking package with OAL in April 2018.**

Boilers and Fired Pressure Vessel Safety Orders.

Cal/OSHA held advisory committee meetings in September 2015 and February and August 2016 and expects to send the draft rulemaking package to **Standards Board staff in Summer 2018**. Advisory committee discussion drafts are available at <http://www.dir.ca.gov/dosh/doshreg/Pressure-Vessel-Safety-Orders/>.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Hotel Housekeeping. The proposed standard was adopted by the Standards Board on January 18, 2018 and approved by the Office of Administrative Law (OAL) on March 9, 2018 with an effective date of **July 1, 2018**. The final text of the regulation is available at <https://www.dir.ca.gov/OSHSB/Hotel-Housekeeping-Musculoskeletal-Injury-Prevention.html>.

Under the new rule, covered employers will be required to have a specific written Musculoskeletal Injury Prevention Program (MIPP). The MIPP must include:

- Procedures to identify and evaluate housekeeping hazards through worksite evaluations;
 - Include employees in the evaluation process;
 - Procedures to investigate musculoskeletal injuries to housekeepers;
 - Methods to correct identified hazards; and
 - Training of employees and supervisors on safe practices and controls, and a process for early reporting of injuries to the employer.
- The initial evaluations, written plan and training all must be completed by **September 29, 2018**.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Indoor Heat. Labor Code section 6720 requires Cal/OSHA to propose an indoor heat regulation to the Standards Board by January 1, 2019. Cal/OSHA convened advisory committee meetings on February 28, 2017, in Oakland; May 25, 2017, in Ontario; and February 8, 2018, in Oakland. **Cal/OSHA posted an updated draft text for the proposal on February 15, 2018.** Cal/OSHA staff are reviewing written and oral comments received from interested parties preparing changes to the draft text.

Advisory committee meeting information, draft text, and other materials are available at <http://www.dir.ca.gov/dosh/doshreg/Heat-illness-prevention-indoors/>



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Indoor Heat Proposed Elements

- **Not yet in formal rule making**
 - Triggered at Temperatures 80 degrees or more
 - Cool down to be provided with cool drinking water
 - “Light work” exception removed
 - High heat measures kick in at 90 degrees
 - Does not apply to professional administrative offices where temperature can be maintained at 85 degrees or less



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Marijuana (Medical). As provided in Labor Code section 147.5, Cal/OSHA convened an advisory committee on October 25, 2016, to evaluate whether there is a need to develop industry-specific regulations related to the activities of facilities issued a license pursuant to the Medical Marijuana Regulation and Safety Act (AB 243 and AB 266). Advisory committee meeting announcements and documents are available at

<http://www.dir.ca.gov/dosh/doshreg/Medical-Marijuana/>

Cal/OSHA's findings and recommendations based on advisory committee input were presented to the Standards Board at their June 15, 2017, meeting in Sacramento. **The Board agreed that there is no need to develop industry-specific regulations related to the activities of medical cannabis facilities at this time.**



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Marijuana (Recreational). As provided in Labor Code section 147.6, Cal/OSHA convened an advisory committee on January 31, 2018, to evaluate whether there is a need to develop industry specific regulations related to the activities of licensees under Division 10 (commencing with section 26000) of the Business and Professions Code, including, but not be limited to, **whether specific requirements are needed to address exposure to second-hand marijuana smoke by employees at facilities where on-site consumption of marijuana is permitted under subdivision (d) of section 26200 of the Business and Professions Code, and whether specific requirements are needed to address the potential risks of combustion, inhalation, armed robberies, or repetitive strain injuries.**

Cal/OSHA staff are reviewing written and oral comments received during and after the advisory committee meeting and preparing a report for the Standards Board regarding the findings and recommendations of the advisory committee. Advisory committee meeting announcements and documents are available at

<http://www.dir.ca.gov/dosh/doshreg/Medical-Marijuana/>.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Permissible Exposure Limits (PELs). The Health Effects Advisory Committee (HEAC) is being convened quarterly to evaluate hazardous substances and recommend exposure limits based on health effects and feasibility. The next meeting will be held in Oakland on December 12, 2017, to discuss PEL updates for methyl isobutyl ketone, hydrogen sulfide, manganese, peracetic acid, and 2-butoxyethyl acetate. Advisory committee schedule, support documentation, and meeting minutes are available at <http://www.dir.ca.gov/dosh/doshreg/5155Meetings.html>

Specific substance rulemaking includes the following:

- **Benzyl chloride:** The proposal to reduce the PEL from 1 part per million to 0.03 part per million was adopted by the Standards Board on October 19, 2017, and approved by OAL on December 5, 2017. The new PEL goes into effect on **April 1, 2018**. The rulemaking documents are available at <http://www.dir.ca.gov/OSHSB/Airborne-Contaminants-Benzyl-Chloride.html>.
- **Other substances:** Cal/OSHA is preparing a rulemaking proposal for aluminum, tetrabromoethane, npropanol, cyclohexane, and trimelitic anhydride, which have gone through the advisory committee process. The draft rulemaking package will be sent to the Standards Board in 2018



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Recording and Reporting Occupational Injuries and Illnesses, with Anti-Discrimination Provisions.

Cal/OSHA staff drafted a proposed rulemaking package to conform to revised federal OSHA regulations requiring electronic submission of Log 300 records of injuries and illnesses. The package is currently under review within the Administration. In the meantime, **California employers are not required to follow the federal requirements.**

Additional information is posted at

<http://www.dir.ca.gov/dosh/calosha-updates/log300-reporting.html>



Heffernan Consulting | 1350 Carlsbad Ave., Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Workplace Violence in General Industry. The Standards Board granted Petition 542 in December 2014 and requested that Cal/OSHA hold advisory committee meetings to assist in developing a workplace violence prevention standard for general industry.

On May 29, 2015, Cal/OSHA sent the Standards Board a report discussing how benefits and lessons learned from the workplace violence in healthcare rulemaking could benefit the rulemaking process for general industry. Cal/OSHA convened advisory committee meetings on January 12, 2017, and January 25, 2018. **Cal/OSHA staff are reviewing all written and oral comments from interested parties and preparing an updated draft text.**

Advisory committee support documentation, meeting minutes, and the initial draft text are available at

<http://www.dir.ca.gov/dosh/doshreg/Workplace-Violence-inGeneral-Industry/>



Heffernan Consulting | 1350 Carlsbad Ave., Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Respirable Crystalline Silica Standard for Construction

Important Update

Employer obligations under the new Respirable Crystalline Silica standard for construction, found in the California Code of Regulations, [Title 8, section 1532.3](#), commenced on June 23, 2017. **Cal/OSHA began enforcing those obligations on September 23, 2017.** During the first 30 days of enforcement, Cal/OSHA was available to assist employers that were making good faith efforts to meet the new standard, to ensure understanding and compliance.

Effective October 23, 2017, Cal/OSHA is fully enforcing all appropriate provisions of the standard. This follows federal OSHA's approach regarding enforcement of their corresponding standard.

Please note: Cal/OSHA's new permissible exposure limit for respirable crystalline silica of 0.05 milligrams per cubic meter (0.05 mg/M³), found in [Title 8 section 5155, Table AC-1](#), went into effect on October 17, 2016. In addition, employers must continue to meet the requirements of [Title 8 section 1530.1](#) to control employee exposures to dust created by operations conducted on concrete or masonry materials.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Next Steps –

- Conduct Job Hazard Analysis for Key Jobs
- Review employee training records and ensure everyone has been trained “on the hazards of their job”, and can “recognize hazards or unsafe conditions”.
- Make sure written programs are in place that are reflective of the workplace;
- Conduct regular facility inspections, involve employees, correct hazards, provide feedback to staff after inspections.
- Conduct Safety Leadership classes with managers and supervisors; safety coaches, mentors, protectors, visionaries.

Join industry associations and stay current on OSHA related aspects of your Industry.



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Helpful Links

- BLS.gov
 - <https://www.bls.gov/iif/oshwc/cfoi/cfch0015.pdf>
- Cal OSHA
 - <http://www.dir.ca.gov/dosh/>
 - <http://www.dir.ca.gov/title8/index/T8index.asp>
 - <http://www.dir.ca.gov/dosh/PubOrder.asp>
 - http://www.dir.ca.gov/dosh/DOSH_Archive.html
 - <http://www.dir.ca.gov/dosh/citation.html>
- National Institute of Safety and Health Publications
 - <http://www.cdc.gov/niosh/pubs/default.html>
- Federal OSHA
 - <http://www.osha.gov/pls/publications/pubindex.list>
 - <https://www.osha.gov/dep/index.html>
- State of Washington Publications
 - <http://www.lni.wa.gov/Safety/Research/Pubs>
- CDC Pubs
 - <http://www.cdc.gov/publications.htm>
- State of Oregon Publications
 - <http://www.orosha.org/standards/publications.html>



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com

Discussion and Questions

Thank You!

Cathi L. Marx, ALCM, COSS, COSM, CHS-V

President; Aspen Risk Management Group

www.aspenrmg.com

619 294 9863



Heffernan Consulting | 1350 Cariback Ave, Ste. 200 | Walnut Creek, CA 94596 | Ph: 800-234-6787 | www.heffins.com