# Safety & Health Program Management—An Overview

## Overview Of Topic

The term "safety and health program" can mean one of two things:

- A comprehensive safety and health program, and/or
- One program in a collection of required and nonrequired safety and health programs.

### Comprehensive safety and health program

This program may be required for your jobsite under 29 CFR, Sections 1926.20 and .21. It all depends whether or not you find it necessary to have one in order to comply with the rest of Part 1926. OSHA encourages construction employers to institute and maintain a program which provides systematic policies, procedures, and practices that are adequate to recognize and protect employees from occupational safety and health hazards. According to the following OSHA sources, an effective program will include several elements:

| Source | Program elements |
|---|---|
| 29 CFR 1926.20, General safety and health provisions | • Programs necessary to comply with Part 1926; and<br>• Frequent and regular inspections of jobsites, materials, and equipment. |
| 29 CFR 1926.21, Safety training and education | • Safety training and education in the recognition and avoidance of unsafe conditions and applicable regulations to control or eliminate hazards or exposure. |
| OSHA Safety and Health Program Management Guidelines (1989)<br>*Note: Does not apply to construction employers.* | • Management commitment and employee involvement;<br>• Worksite analysis;<br>• Hazard prevention and control; and<br>• Safety and health training. |
| Draft Proposed Safety and Health Program Rule (1998)<br>*Note: Does not apply to construction employers at this time.* | • Management leadership and employee participation;<br>• Hazard identification and assessment;<br>• Hazard prevention and control;<br>• Information and training; and<br>• Evaluation of program effectiveness. |

OSHA has also concluded that effective management of worker safety and health protection is a decisive factor in reducing the extent and the severity of work-related injuries and illnesses. Effective management addresses all work-related hazards, includ-

ing those potential hazards which could result from a change in worksite conditions or practices. It addresses hazards whether or not they are regulated by government standards.

**Program in collection of safety and health programs**

There are several specific required and nonrequired safety and health programs:

- Accident reporting and investigation
- Back safety/lifting
- Behavior-based safety
- Bloodborne pathogens
- Compressed gases
- Confined space entry
- Construction equipment
- Contractor and subcontractor safety
- Company safety policy
- Crane and derrick operations
- Electrical safety (§§1926.400-.449)
- Emergency action plan (§1926.35)
- Emergency response plan (§1926.65(q))
- Ergonomics
- Excavations (§§1926.650-.652 & app.)
- Fall protection (§§1926.500-.503 & app.)
- Fire prevention
- Forklift operation procedures
- Gases, vapors, fumes, dusts, and mists
- Hazard communication (§1926.59)
- Hazardous waste (40 CFR 260-268)
- HAZWOPER (§1926.65)
- Hearing conservation
- Housekeeping
- Indoor air quality
- Integrated contingency plan (40 CFR 68, 112.7(d), 112.20, 264 (Subpart D), 265 (Subpart D), and 279; 30 CFR 254; 49 CFR 194; 33 CFR 154 (Subpart F); and 29 CFR 1926.35, .64, and .65)
- Lockout/tagout
- Machine and tool safety
- Medical surveillance and first aid (§§1926.60(n), .62(j), .1101(m), .1103-.1118, .1127(l), .1128, .1129, .1144, .1145, .1147, .1148, .1152)
- Office safety
- Oil spill prevention and response (49 CFR 130.31)
- Personal protective and lifesaving equipment
- Process safety management (§1926.64)
- Respiratory protection (§1926.103)
- Risk management (40 CFR 68)
- Return-to-work program
- Scaffolding and aerial lifts
- Spill prevention, control and countermeasure (40 CFR 112)
- Stairways and ladders
- Stormwater pollution prevention plan (40 CFR 122)
- Substance abuse program
- Superfund Amendments Reauthorization Act (40 CFR 302-370)
- Temperature extremes
- Toxic and hazardous substances (including asbestos and lead) (§§1926.60, .62, and .1101-.1152)
- Universal wastes (40 CFR 273)
- Used oil management (40 CFR 279)
- Welding and cutting
- Worksite security

Note: Required programs are followed by a regulation citation.

## Employee Training

Information and training, as part of a comprehensive safety and health program, should cover the following subjects: (a) nature of hazards and how to recognize them; (b) what is being done to control these hazards; (c) protective measures to prevent or minimize exposure hazards; and (d) applicable standard provisions.

Most specific safety and health programs will include a training element. Refer to specific regulations for the necessary elements of a specific safety and health program.

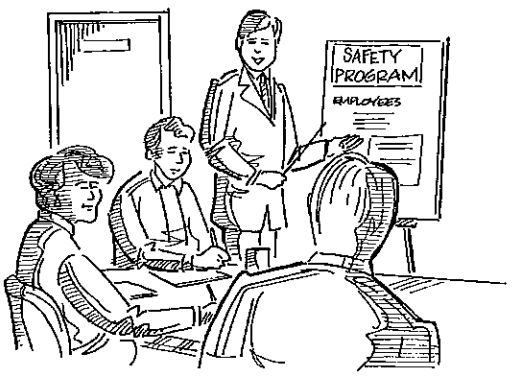
# KELLER'S CONSTRUCTION TOOLBOX TALKS

## Safety and health program management

To reduce the occurrence of job-related fatalities, injuries, and illnesses, many jobsites take a proactive approach. They develop what is called a "safety and health program." This program may include any and all of the following management elements:

**Management leadership**

- Establish responsibilities of managers, supervisors, and employees for safety and health;
- Provide managers, supervisors, and employees with authority, information, training, and resources needed to carry out their responsibilities; and
- Identify at least one person to handle reports about safety and health conditions, and, where appropriate, initiate corrective action.




**Employee participation**

- Communicate with employees about safety and health matters;
- Provide information to employees;
- Provide ways employees can get involved in hazard identification and assessment, prioritizing hazards, training and program evaluation;
- Establish hazard and incident reporting method; and
- Provide prompt responses to reports.

**Hazard identification and assessment**

- Conduct worksite inspections;
- Review safety and health information;
- Evaluate new equipment, materials, and processes; and
- Assess severity of identified hazards and rank those that can't be corrected immediately.

**Hazard prevention and control**

- Develop a plan to come into compliance. Set priorities and deadlines and track progress.

**Information and training**

- Ensure each employee is provided with information and training in safety and health; and
- Ensure each employee exposed to a hazard is provided with hazard information/training.

**Evaluation of program effectiveness**

- Evaluate the program to ensure it is effective and appropriate to workplace conditions.

Put these elements together and you have a program which is adequate to recognize and protect you and your co-workers from occupational safety and health hazards.

# KELLER'S CONSTRUCTION TOOLBOX TALKS


## Safety & Health Program Management—An Overview Sign-Off Sheet

This sign-off sheet documents the employees at this company, _____, who have taken part in a training session on Safety and Health Program Management—Overview. The session covered *(checkmark the appropriate training element(s))*:

- ❑ Programs implemented and maintained by the company.
- ❑ How the company has demonstrated management leadership.
- ❑ How the company has provided employees with opportunities for participation in establishing, implementing, and evaluating the safety and health program.
- ❑ How the company systematically identifies and assesses hazards to which employees are exposed and assesses compliance with OSHA standards (this includes implementation of jobsite, materials, and equipment inspections).
- ❑ How the company systematically complies with the hazard prevention and control requirements of OSHA standards.
- ❑ How the company ensures that each employee is provided information and training in the safety and health program.
- ❑ How the company ensures that each employee exposed to a hazard is provided with information and training in that hazard (the nature of hazards and how to recognize and avoid them, what is being done to control or eliminate these hazards, protective measures to prevent or minimize exposure hazards, and applicable standard provisions).
- ❑ How the employer evaluates the safety and health program to ensure that it is effective and appropriate to workplace conditions.

The space below is for employees to "sign-off" that they were in attendance.

**Date of Training:** _____ **Job Location:** _____

| **Employee Signature** | **Print Name Here** |
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Supervisor's Signature


# Safety & Health Program Management—Behavior-Based Safety

## Overview Of Topic

Behavior-based safety is a relatively new term that is being used to reflect a proactive approach to safety and health management. So what exactly is this relatively new concept, and how can it apply to your company and employees?

### What is behavior-based safety?

Behavior-based safety describes a proactive approach to injury prevention that either focuses on at-risk behaviors that can lead to an injury, or on safe behaviors that can contribute to injury prevention. In other words, behavior-based safety is an injury prevention process.

Safety is really an evolving process, which means it's continuous. If you really want to reduce work-related injuries, and keep reducing them, you need to make safety a way of life by involving employees in your safety process.

Though many people can agree on the definition for behavior-based safety, few can agree on what the process actually involves. For example, some experts feel that behavior-based safety should be a rigid set of procedures; others feel it should be more flexible, and should integrate personal values. Still others feel that behavior-based safety should incorporate humanistic concepts, such as self-esteem and personal motivation techniques.

### Corporate safety culture

The way each employee views the organization's corporate culture and the role that each employee plays in helping the organization achieve certain goals can have a significant impact on his or her individual motivation toward safety.

Whether employee attitudes are good or bad is at the core of what predicts results in terms of workplace safety and health. When refining the safety culture and performance of an organization, Dr. E. Scott Geller identifies some of the most important aspects that you may wish to concentrate on, including:

- Developing a clear safety mission and goals at the management level.

- Communicating the vision and goals to all levels of the company.
- Enabling each work group to attain its own specific safety goals.
- Encouraging individual participation by all members of the company.
- Empowering employees to set and achieve their own safety goals.
- Fostering mutual respect and support at all levels of the company.

## Employee Training

OSHA regulations do not contain training requirements for behavior-based safety. However, a training program can provide an overview of behavior-based safety and can be used to familiarize employees with your behavior-based safety process.

## Training Tips

This training material is based on Dr. Geller's "DO IT" approach to behavior-based safety. As with any type of training, the content needs to be adapted to the needs of the trainees. You may want to:

- Discuss the safety culture and safety goals of your organization.
- Outline some of the benefits your organization has realized since your behavior-based process has been in place.

### Where To Go For More Information

J. J. Keller & Associates, Inc. has a practical behavior-based safety program developed by Dr. Geller that can help you incorporate behavior-based safety into your organization's overall management system.

# KELLER'S CONSTRUCTION TOOLBOX TALKS

## Safety & Health Program Management—Behavior-Based Safety

The way you view your company's corporate culture and the role that you (and other employees) play in helping your company achieve certain goals has a significant impact on your motivation toward safety.

There are many different views of behavior-based safety. Some of the concepts are based on research; some are based on common sense. Some experts say behavior-based safety is all you need; others say it's only part of the safety effort needed. Some say reinforcement is the answer; others say there are not enough opportunities for reinforcement in the workplace.

**Why should your company use behavior-based safety?**


- Statistics reveal that many accidents are caused by at-risk behavior.
- The frequency of injuries can be reduced.
- The entire workforce can participate in the process.
- Safety improvements are made by teams.
- Behavior-based safety requires progressive and proactive thinking.
- When added to a safety program already attempting to comply with regulations, behavior-based safety may show "good faith."

**Key elements of behavior-based safety**

- Employee/management involvement.
- Identification of safe and at-risk behavior.
- Observation.
- Feedback.
- Intervention.
- Evaluation of process for effectiveness,

But, however your company looks at it, behavior-based safety is the process of focusing on behavior to prevent/reduce occupational injuries.


## Safety & Health Program Management—Behavior-Based Safety Sign-Off Sheet

This sign-off sheet documents the employees at this company, _____, who have taken part in a training session on Safety and Health Program Management—Behavior-Based Safety. The session covered:

- What behavior-based safety is.
- Why should your company use behavior-based safety.
- What are the key elements of behavior-based safety.

The space below is for employees to "sign-off" that they were in attendance.

**Date of Training:** _____ **Job Location:** _____

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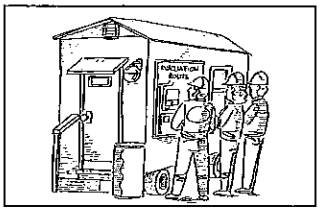


# Safety & Health Program Management—Emergency Action Plans

## Overview of Topic

OSHA's Emergency Action Plan standard, (29 CFR §1926.35) requires construction companies to have a written emergency action plan (EAP) if it has at least eleven employees, has no current written emergency action plan, and falls under a particular OSHA standard that requires an emergency action plan, including any one or more of the following:

| Standard and Paragraph Citation | Name |
|---|---|
| 1926.64 | Process Safety Management of Highly Hazardous Chemicals |
| 1926.65 | Hazardous Waste Operations and Emergency Response (HAZWOPER) |
| 1926.1117(i) | Vinyl chloride (if present in any quantity as a liquid or compressed gas, EAP required) |
| 1926.1127(h) | Cadmium (if present in any quantity, EAP required) |
| 1926.1144(i) | 1,2-dibromo-3-chloropropane (DBCP) (if present in any quantity, EAP required) |
| 1926.1145(i) | Acrylonitrile (if liquid present in any quantity, EAP required - see Subpart Z chapter for information on other written plans associated with this regulation) |
| 1926.1147(h) | Ethylene Oxide (EtO) (for each workplace where there is the possibility of emergency - see Subpart Z chapter for information on other written plans associated with this regulation) |

The written emergency action plan, is the written record of what your company does in emergencies. The emergency action plan should address emergencies that you may reasonably expect at the worksite. Examples are: fire, toxic chemical releases, and floods.

The plan should, at a minimum, include the following elements:

- *Purpose*—A statement of the plan's purpose.
- *Emergency escape procedures and assignments*—The use of floor plans or worksite maps which clearly show the emergency escape routes should be included in the emergency action plan.
- *Critical operations procedures*—To be followed by employees who remain to maintain critical operations before they evacuate.

- *Employee head count procedures*—Procedures to account for all employees after emergency evacuation has been completed.
- *Rescue and medical duty assignments*—Rescue and medical duties for those employees who are to perform them.
- *Fire and emergency reporting procedures*—Preferred means of reporting fires and other emergencies.
- *Responsible person list*—Names and/or regular job titles of persons or departments to contact for further information.
- *Types of emergency evacuations*—To be used in emergency circumstances.
- *Alarm system*—The employer must establish an employee alarm system complying with §1926.150(e).

## Employee Training

Before implementing the emergency action plan, you should designate and train a sufficient number of employees to assist in the safe and orderly evacuation of employees. In addition, you should review the plan with each employee covered by the plan: (1) initially when the plan is developed, (2) whenever the employee's responsibilities or designated actions under the plan change, and (3) whenever the plan is changed.

The employer shall review with each employee upon initial assignment those parts of the plan which the employee must know to protect the employee in the event of an emergency. For those employers with 10 or fewer employees the plan may be communicated orally to employees and the employer need not have a written plan.

## Training Tips

The handout provided here should be used with company-specific or site-specific information regarding your emergency action plan.

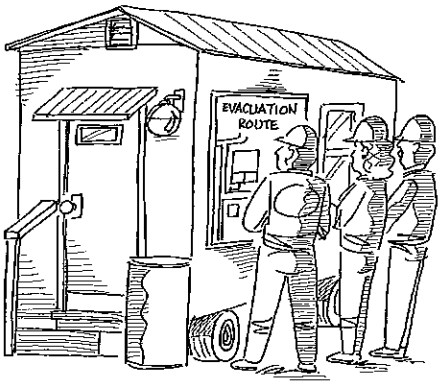
### Where To go For More Information

29 CFR 1926.35—Emergency action plans

# KELLER'S CONSTRUCTION TOOLBOX TALKS

## Emergency Action Plans (EAPs)

According to OSHA requirements, sometimes companies must have what is known as an emergency action plan (EAP), to plan for emergency situations and inform you of what you must do if and when they occur. Your company's EAPs must have the specific actions you are to take in case of an emergency, and should include the following elements:




- Best way to report fires and other emergencies.
- How the alarm system sounds for different kinds of emergencies.
- Emergency escape procedures and routes to take.
- Procedures for workers who stay behind to operate critical equipment or functions before they evacuate.
- Procedures to account for employees after evacuation is completed.
- Rescue and medical duties for designated employees.
- Names or regular job titles of persons or departments to be contacted for further information of duties under the plan.

Your employer will designate and train employees to assist in safe and orderly evacuation. If your company has fewer than ten employees, the EAPs do not have to be written. Your supervisor will give them to you verbally.

**Training for emergencies**

Training must be given:

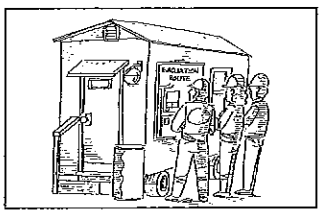
- When first starting your job.
- Whenever your job responsibilities change.
- Whenever the EAPs are first developed or changed.

The plans must be kept at each worksite and made available to all employees.

If your company is involved in maintenance or repair, major renovation, or specialty work in a facility where exposure to highly hazardous chemicals (such as a petrochemical plant) is possible; is working at a place covered by Hazardous Waste Operations & Emergency Response (HAZWOPER); or if vinyl chloride, cadmium, acrylonitrile, or 1,2-dibromo-3-chloropropane (DBCP) are present in certain quantities or forms; an EAP is required.

Your employer is responsible for training you on the known potential hazards at that specific site and the EAP you should follow.

# KELLER'S CONSTRUCTION TOOLBOX TALKS



## Safety & Health Program Management—Emergency Action Plans Sign-Off Sheet

This sign-off sheet documents the names of employees who attended this training session on Emergency Action Plans at _____.
(company name)

The session covered:

- What an emergency action plan is.
- What it should contain.
- What types of circumstances might require an emergency action plan to be put into place at a company.

The space below is for employees to "sign-off" that they were in attendance.

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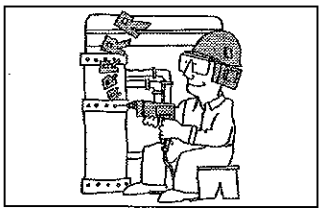


# Safety & Health Program Management—Hearing Conservation Program

## Overview of Topic

Research demonstrates that construction workers are regularly overexposed to noise. The National Institute for Occupational Safety and Health (NIOSH) estimates that 421,000 construction workers are exposed to noise above 85 dBA. According to NIOSH, 15 percent of workers exposed to noise levels of 85 dBA or higher will develop a hearing impairment. In addition to hearing loss, other risks of noise exposure include impaired balance and falls, hypertension, elevated blood pressure, reduced communication and effectiveness of audible warning devices (such as vehicle back-up alarms).

Currently, employers are required to have a hearing conservation program that includes the following elements if sound levels exceed the values shown in Table D-2 of §1926.52:

| Program element: | Requirement: |
|---|---|
| Monitoring | Determine the sound level of machines and operations by methods such as sound surveys, full-shift dosimetry, use of insurance carriers, or reliance on information from equipment manufacturers and technical literature. |
| Engineering and administrative controls | If exposure limits are exceeded, implement engineering or administrative controls, where feasible. Engineering controls include rubber mountings, sound-absorbing tiles, and locating noisy equipment away from workers. Administrative controls include arranging schedules to reduce the time each worker spends at a noisy task. |
| Training | Instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her work environment to control or eliminate any hazards or other exposure to illness or injury. |
| Hearing protection | Provide hearing protection to reduce sound levels reaching the cochlea to within the limits specified in Table D-2. All insert hearing protectors must be fitted individually to each overexposed employee by a competent person, someone trained in ear protection fitting and able to recognize the difference between a good fit and a poor fit. |
| Audiometric testing | Periodic audiometric testing is required for employees overexposed to noise. |

Construction regulations §1926.21(b)(2), .52, and .101 include only minimum requirements for hearing conservation and lack the specific requirements for an effective hearing conservation program already found in general industry's §1910.95. OSHA intends to propose to extend to construction the hearing conservation protections provided in the general industry regulation. The following are the additional hearing conservation program elements required by general industry: audiogram evaluation, hearing protection for employees who suffer a standard threshold shift, specific training and information, and recordkeeping.

## Employee Training

An effective training program should be updated when protective equipment, work processes, or regulations change. It might include:

- Effects of noise and duration of noise on hearing;
- A discussion of any engineering and administrative controls implemented at the site.
- Purpose of hearing protectors and the advantages, disadvantages, and attenuation of various types;
- Instructions on selection, fitting, use, and care of hearing protectors;
- Purpose of audiometric testing and an explanation of test procedures;
- How to recognize and avoid unsafe conditions;
- The regulations §1926.52 and .101 as they apply to each employee's work environment; and
- How to control or eliminate any exposure.

## Training Tips

List the dBA levels of various equipment and tasks. For example, rock drilling can reach 115 dBA, chain saws 125 dBA, abrasive blasting 112 dBA, heavy equipment 110 dBA, demolition 117 dBA, and needle guns 112 dBA. Show slides of the equipment/tasks that require hearing protectors. Dispell myths about workers "getting used to" the noise. Have samples of all approved hearing protective devices. Indicate where workers can find hearing protectors.

### Where To Go For More Information

29 CFR 1926.21(b)(2)—Safety training and education.

29 CFR 1926.52—Occupational noise exposure.

29 CFR 1926.101—Hearing protection.

# KELLER'S CONSTRUCTION TOOLBOX TALKS

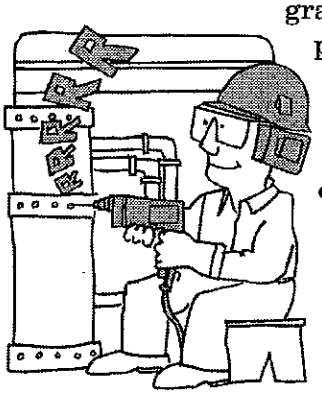
## Hearing Conservation Programs Offer Protection

Researchers estimate that 15 percent of workers exposed to noise levels of 85 dBA or higher will develop a hearing impairment. Unfortunately, it's not uncommon for construction equipment and activities to surpass these noise levels. Take a look at the sound levels of the following equipment and activities:

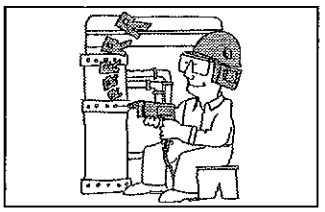
- Rock drilling—Up to 115 dBA
- Chain sawing—Up to 125 dBA
- Abrasive blasting—105 to 112 dBA
- Heavy equipment operation—95 to 110 dBA
- Demolition—Up to 117 dBA
- Needle guns—Up to 112 dBA

However, noise levels are not the only factors that create hearing impairment. The amount of time you are exposed is also a factor. OSHA permits exposures to 115 dBA for a maximum of 15 minutes for an 8-hour work day. So, for example, you can perform rock drilling for up to 15 minutes without protection. Lower dBA levels are allowed for longer periods of time. OSHA permits exposure to 90 dBA for an entire 8-hour work day.

However, it does not make business sense to perform rock drilling or any other activity based on noise levels and time limits. So what can construction companies do? The answer is—set up a hearing conservation program. A hearing conservation program is a company-specific program to protect the hearing of employees. Effective hearing conservation programs will have the following:



- **Exposure monitoring**—Your company will determine the sound level of machines and operations using any number of methods.
- **Engineering and administrative controls**—If exposure limits are exceeded, your company must implement engineering or administrative controls, where feasible. Engineering controls use technology to isolate or remove a hazard. Examples include rubber mountings, sound-absorbing tiles, and locating noisy equipment away from workers. Administrative controls change the duration, frequency, and/or severity of exposure. Arranging work schedules to cut down on the time each worker spends at a noisy task is an administrative control.
- **Training**—Your company will instruct you in how to recognize and avoid unsafe noise levels, the safety rules applicable to your work environment, and how to control or eliminate any noise hazards or exposures.
- **Hearing protection**—If exposure limits are exceeded even after engineering and administrative controls are implemented, your company will provide you with proper hearing protection. If you will be using insert hearing protectors, they must be fitted by a competent person. A competent person is someone who can tell the difference between a good fit and a poor fit. Plain cotton is not an acceptable protective device.
- **Audiometric testing**—If you are overexposed to noise, your company must periodically perform audiometric testing. This procedure checks your hearing by sending sounds (tones) through headphones. The person being tested responds to test sounds when they are first heard. The chart that records responses to the test sounds is called an audiogram. With audiometric testing, any hearing loss can be identified and dealt with properly and promptly.



# Safety & Health Program Management—Hearing Conservation Program Sign-Off Sheet

This sign-off sheet documents the employees at this company, _____, who have taken part in a training session on Safety & Health Program Management—Hearing Conservation Program. The session covered:

- Effects of noise and duration of noise on hearing;
- A discussion of any engineering and administrative controls implemented at the site;
- Purpose of hearing protectors and the advantages, disadvantages, and attenuation of various types;
- Instructions on selection, fitting, use, and care of hearing protectors;
- Purpose of audiometric testing and an explanation of test procedures;
- How to recognize and avoid unsafe conditions;
- Regulations §1926.52 and .101 as they apply to each employee's work environment; and
- How to control or eliminate any exposure.

The space below is for employees to "sign-off" that they were in attendance.

**Date of Training:** _____ **Job Location:** _____

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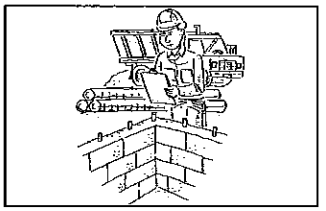


# Safety & Health Program Management—Safety Training & Education

## Overview Of Topic

29 CFR 1926.21 is the "general" training rule for all construction work. It requires employers to:

- Avail themselves of the safety and health training programs the Department of Labor provides, and
- Instruct employees in the recognition and avoidance of unsafe conditions and the regulations applicable to his/her work environment to control or eliminate any hazards or other exposure to illness or injury and the specific topics listed in the chart below.

The Department of Labor itself is required to establish and supervise programs for the education and training of employers and employees in the recognition, avoidance, and prevention of unsafe conditions at construction sites.

## Employee Training

The rule requires your company to instruct employees in the following:

| The following employees: | Must be instructed in: |
|---|---|
| Employees who handle or use poisons, caustics, and other harmful substances | The safe handling and use, and the potential hazards, personal hygiene, and personal protective measures required. |
| Employees who may be exposed to job site areas where harmful plants or animals are present | The potential hazards, how to avoid injury, and the first aid procedures to be used in the event of injury. |
| Employees required to handle or use flammable liquids, gases, or toxic materials | The safe handling and use of these materials and the specific requirements contained in Subparts D, F, and other applicable subparts of 29 CFR 1926. |

| The following employees: | Must be instructed in: |
|---|---|
| All employees required to enter into confined or enclosed spaces | The nature of the hazards involved, the necessary precautions to be taken, and the use of protective and emergency equipment required. Employers must comply with any specific regulations that apply to work in dangerous or potentially dangerous areas.<br>***NOTE:*** "Confined or enclosed space" means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined or enclosed spaces include, but are not limited to, storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines, and open top spaces more than 4 feet in depth such as pits, tubs, vaults, and vessels. |

## Training Tips

Training under 1926.21 is impossible to do as one training program. The training requirements above are best covered during each specific training program. For example, training employees who handle or use poisons, caustics, and other harmful substances can be done during hazard communication training. Confined space training could be performed during a confined space training program. Employees exposed to harmful plants and animals may be trained during first aid training.

In *all* of your company's training programs, however, be sure you explain how employees may recognize and avoid unsafe conditions and discuss the regulations applicable to their work environment so that they may control or eliminate any hazards or other exposure to illness or injury.

### Where To Go For More Information

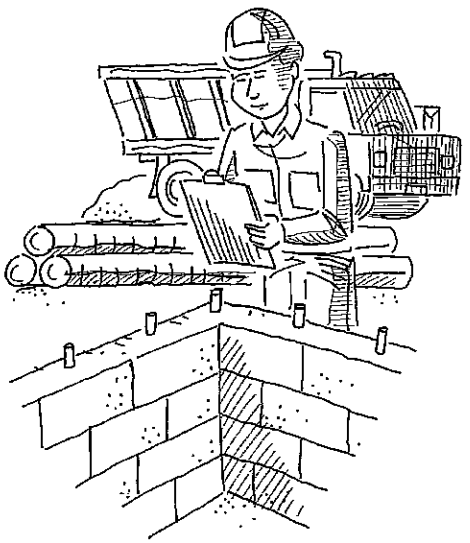
29 CFR 1926.21—Safety training & education

29 CFR 1926.50—Medical services and first aid

29 CFR 1926.59—Hazard Communication

# KELLER'S CONSTRUCTION TOOLBOX TALKS

## Safety Training & Education



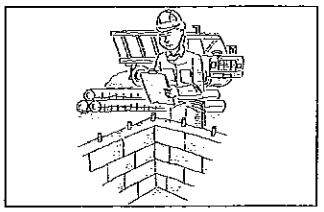
Good construction site safety not only protects your company's assets, it also protects you, your tools, and your job. You are an important player in job site safety. The simplest of tasks such as: placing trash where it belongs, coiling up extension cords when they are not being used, and stacking lumber out of the way, may seem unimportant and unnecessary, until someone gets hurt.

Your employer is responsible for training you in the recognition, avoidance, and prevention of unsafe conditions and in the regulations applicable to your workplace. This training should allow you to better control or eliminate any hazards or other exposure to illness or injury.

OSHA has listed some things you need to be specifically trained on, depending whether or not you are exposed to certain conditions. Mandatory training includes the elements in the table below:

| If you: | Then you must be trained in: |
|---|---|
| Handle or use poisons, caustics, and other harmful substances | The safe handling and use of these substances, and the potential hazards, personal hygiene, and personal protective measures required. |
| May be exposed to job site areas where harmful plants or animals are present | The potential hazards, how to avoid injury, and the first aid procedures to be used in the event of injury. |
| Handle or use flammable liquids, gases, or toxic materials | The safe handling and use of these materials and the specific requirements for occupational health, environmental controls, and fire protection and prevention, as well as other construction regulations. |
| Enter into confined or enclosed spaces | The nature of the hazards involved, the necessary precautions to be taken, and the use of protective and emergency equipment required.<br>***NOTE:*** "Confined or enclosed space" means any space having a limited means of egress, which is subject to the accumulation of toxic or flammable contaminants or has an oxygen deficient atmosphere. Confined or enclosed spaces include, but are not limited to, storage tanks, process vessels, bins, boilers, ventilation or exhaust ducts, sewers, underground utility vaults, tunnels, pipelines, and open top spaces more than 4 feet in depth such as pits, tubs, vaults, and vessels. |

Your employer may choose to train you in the topics above during regular hazard communication training, confined space training, and other training programs. Pay attention to these important topics and all items discussed during training. You and your co-workers' lives depend on your understanding of how to recognize, avoid, and prevent the hazards at your worksite.



## Safety & Health Program Management—Safety Training & Education Sign-Off Sheet

This sign-off sheet documents the names of employees who attended this training session on Safety Training & Education at _____.
(company name)

The session covered:

- The need for training on specific items depending on job responsibilities.
- The need for general training of employees on the recognition and avoidance of unsafe conditions.

The space below is for employees to "sign-off" that they were in attendance.

**Date of Training:** _____ **Job Location:** _____

| **Employee Signature** | **Print Name Here** |
|---|---|
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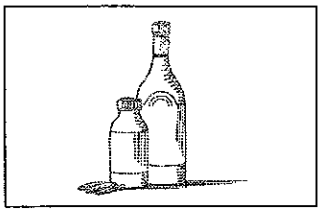
_____
Supervisor's Signature



## Safety & Health Program Management—Substance Abuse Program

### Overview Of Topic

Substance abusing employees cost you in absenteeism, sick leave, overtime pay, insurance claims, tardiness, workers' compensation, and other ways. In 1996, the U.S. Department of Health and Human Services released a study that pointed out that construction employees have one of the highest rates of illicit drug and heavy alcohol use. In general, unmarried workers have twice the rate of illicit drug and heavy alcohol use as married workers. However, the discrepancy between married and unmarried construction workers was especially notable.

OSHA does not have a substance abuse standard. However, in some situations, OSHA's General Duty Clause, Section 5(a)(1) of the OSH Act, may be applicable. The General Duty Clause states, "Each employer shall furnish to each of his employees employment and a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

While OSHA does not have a standard for substance abuse, other agencies do. In fact, we have covered one of them in this manual, under the Heavy Equipment—Motor—Federal Motor Carrier Safety Regulations—Controlled Substances & Alcohol Use & Testing topic. Also, if your company has certain types of contracts with the federal government, you may need to comply with certain federal regulations that require substance abuse programs.

However, OSHA strongly supports measures that contribute to a drug-free work environment and reasonable programs of drug testing within a comprehensive workplace program. The Agency is mainly concerned with safety-sensitive duties like security officers, emergency responders, and vehicle or equipment operators.

There are five standard components of a comprehensive work place substance abuse program that should be considered: (1) a written policy statement, (2) supervisor training, (3) employee education and awareness, (4) employee assistance, and (5) drug and alcohol testing.

## Employee Training

Employees should be trained in:

- The company's substance abuse policy and consequences;
- How to get help with substance abuse problems;
- How drugs/alcohol actually affect the company, the employee, the community, and children;
- Testing procedures, if any;
- Health effects of alcohol and drugs (illegal and prescription);
- Illegal drugs—what they look like, how they are used, their effects, the symptoms of overdose and withdrawal; and
- How to recognize the signs of substance abuse.

Supervisors are the key to the success of a substance abuse policy. As the people in direct contact with employees, supervisors can detect performance problems that may indicate substance abuse. Supervisors should be trained to observe employees' job performance, noting physical signs (unusual clumsiness and frequent illness), mood (extreme fluctuations in happiness and depression), more than usual absenteeism, violent reactions when things go wrong, an increased number of accidents, antisocial behavior, and frequent irritation by co-workers.

Other training topics for supervisors include: information on specific drugs, methods of detecting drug and alcohol use, insurance coverage for substance abuse treatment, prevention and education strategies, background on drug testing issues, and how the drug testing program relates to the employee assistance program.

## Training Tips

Education and awareness programs can vary. Talk to other companies that already have programs in place.

### Where To Go For More Information

Drug-Free Workplace Act of 1988.

USDOL, An Employer's Guide to Dealing with Substance Abuse.

# KELLER'S CONSTRUCTION TOOLBOX TALKS

## Substance abuse

Worker impairment caused by mood-altering substances is not new. For several decades, alcohol has topped the list of drugs that can adversely impact an employee's health; however, use of over-the-counter medications, as well as abuse of prescription drugs, poses an increasingly large problem in the workplace. In addition to alcohol, the common types of drugs that may be encountered in today's workplace include:

- **Marijuana:** Use of marijuana may impair or reduce short-term memory and comprehension, alter sense of time, and reduce a person's ability to perform tasks requiring concentration and coordination. Marijuana can also produce paranoia and psychosis.
- **Amphetamines:** Because of the stimulating effect these drugs have on the central nervous system, they are frequently abused by people who must stay awake for long periods of time.

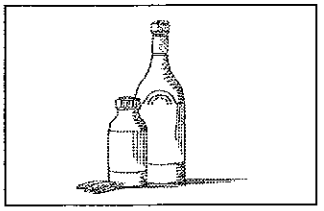
- **Barbiturates:** Barbiturates comprise the largest class of drugs, and, as a result, are the most widely abused. The effects of tranquilizers and barbiturates, when taken in large doses, are similar to those evident from overindulgence in alcohol.
- **Cocaine:** Cocaine, the most powerful natural stimulant, is widely abused and very dangerous. A powerful derivative of cocaine called crack (or rock), is also used, and is known as one of the most powerfully addictive drugs on the illegal market.
- **Inhalants:** A variety of psychoactive substances have been inhaled as gases or volatile liquids. Many popular commercial preparations, such as paint thinners and cleaning fluids, are mixtures of volatile substances making it difficult to be specific about their various effects.
- **Narcotics:** The term narcotic is given to drugs of the opiate family. Heroin and other semi-synthetic drugs such as Darvon, Dilaudid, and Percodan, are also derived from opium. Narcotics initially produce a feeling of euphoria, followed by drowsiness, nausea, and vomiting.
- **Hallucinogens:** Phencyclidine (PCP) is one type of hallucinogen that produces behavioral alterations that can be multiple and dramatic. Because the drug blocks pain receptors, violent PCP episodes may result in self-inflicted injuries.

**Know someone with a drug problem?**

Tell the person that based on what you've seen, you believe something is happening and it concerns you. Urge that person to get help.

**Think you have a drug problem?**

Talk to someone in your company's employee assistance program or call an information hotline: National Institute on Drug Abuse, (800) 662-HELP; 1-800-COCAINE; Alcoholics Anonymous, (212) 686-1100; or National Clearinghouse for Alcohol and Drug Information, (800) 729-6686.



## Safety & Health Program Management—Substance Abuse Program Sign-Off Sheet

This sign-off sheet documents the employees at this company, _____, who have taken part in a training session on Safety & Health Program—Substance Abuse Program. The session covered:

- The company's substance abuse policy and consequences.
- How to get help with substance abuse problems.
- How drugs/alcohol actually affect the company, the employee, the community, and children.
- Testing procedures, if any.
- Health effects of alcohol and drugs (illegal and prescription).
- Illegal drugs—what they look like, how they are used, their effects, the symptoms of over dose and withdrawal.
- How to recognize the signs of substance abuse.

The space below is for employees to "sign-off" that they were in attendance.

**Date of Training:** _____ **Job Location:** _____

| **Employee Signature** | **Print Name Here** |
|---|---|
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_____
Supervisor's Signature