

Common IH findings

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JD, CSP, ALCM, ARM, CFPS

STM Training 2010



Permit Confined Spaces

CCR T8 § 5157

PERMIT SPACE PROGRAM

- Entry permits (permit System) (5157 (e))
 - Identity & Purpose & duration (Permit expiration)
 - Permit issued for two or more shifts
 - Form convoluted with no remarks section
 - Initials v. signatures

- Continuous and/or periodic monitoring (5157 (c) (5)(B)(6))

- Classification (downgrade) of confined space (5157 (c)(7))

- Written program adopts CFR Vs. Title 8

Permit Confined Spaces

CCR T8 § 5157

PERMIT SPACE PROGRAM

- Warning signs (location and availability (5157 (c)(2) & 3340)
- training on entrant & attendant & entrant supervisor & rescue person duties (5157 (g)& (h) & (i) &(j) & (k))
- Host employer v. subcontractor 5157 (c)(8)
- Comprehensive evaluation (observation, interview, doc review) (VPP)

Laboratory Type Hood Operations

§ 5154.2

- Testing for average and minimum face velocity (100/70 fpm) (5154.2 (c) (1)
or (150/125 fpm) (5209 (b)(11))
- Ventilation duration (5154.2 (d))
- Sash marking (5154.2 (e)(1))
- Deficient system placard (5154.2 (e)(1))
- Qualitative air flow monitor (Jan 2008)
(5154.2 (e)(3)(A))
- Operators qualifications (5154.2 (f))

Mechanically Driven Ventilation Systems § 5143

- Use of Portable ventilation (elephant trunks)
 - Air monitoring
 - maintenance
- Use of local ventilation
 - Pre-use
 - Employee training

Asbestos § 5208

{Not applicable to construction and ship building but to all GI}

The employer shall ensure that no employee is exposed to an airborne concentration of asbestos in excess of 0.1 fiber per cubic centimeter (0.1 f/cc) of air as an TWA

- Policy not defined (conduct inventory or assume all is asbestos & sample as needed)
- No or Incomplete Inventory of asbestos
- Inventory not provided to contractors
- No Asbestos awareness Training (initial/annual for employees likely exposed & class IV)
 - 1529 (k)(9)(B)
 - 5208 (j)(7)(B)
- Asbestos is a Regulated carcinogen, need report of use

Asbestos § 5208

■ Products still banned - 1989 TSCA

- Six asbestos-containing product categories that are still subject to the asbestos ban include:
- 1) corrugated paper, 2) rollboard, 3) commercial paper, 4) speciality paper, 5) flooring felt, and 6) new uses of asbestos.

■ Products not banned -

Asbestos-containing product categories no longer subject to the 1989 TSCA ban include:

- asbestos-cement corrugated sheet, asbestos-cement flat sheet, asbestos clothing, pipeline wrap, roofing felt, vinyl-asbestos floor tile, asbestos-cement shingle, millboard, asbestos-cement pipe, automatic transmission components, clutch facings, friction materials, disc brake pads, drum brake linings, brake blocks, gaskets, non-roofing coatings, and roof coatings.

Regulated Carcinogen

§ 5203

- **5203 regulated carcinogen:**
 - report use in writing to the Chief.
 - 24 existing Regulated carcinogens

Regulated Carcinogens §5203

Provide the information in items 1 through 6 below for each carcinogen checked on page one.

If multiple carcinogens are checked on page one, make extra copies of this page and indicate here the name of the carcinogen the information is for: _____

1. A brief description of each process or operation which may result in employee exposure to the carcinogen.
2. The location in the workplace where the carcinogen is present or used.
3. The number of employees engaged in each process or operation.
4. The name and address of any collective bargaining representative(s), or other representatives of the employees.
5. A brief description of the quantities of carcinogen present or used.
6. Nature of Business: Indicate the Standard Industrial Classification (SIC) or North American Industry Classification System (NAICS) code, see <http://www.census.gov/epcd/www/naics.html> or if the SIC or NAICS are unknown, what is the type of industry and principal product(s).

When completed this form should be mailed or faxed to the Division of Occupational Safety and Health at:

Mailing address: DOSH - OCCU
 P.O. Box 420603
 San Francisco, CA 94142

Fax number: (510) 286-7040

| <u>NAME OF CARCINOGEN</u> | <u>CODE SECTION</u> |
|--|---------------------|
| 2-ACETYLAMINOFLUORENE | <u>5209</u> |
| 4-AMINODIPHENYL | <u>5209</u> |
| BENZIDENE (and its salts) | <u>5209</u> |
| 3,3-DICHLOROBENZIDINE (and its salts) | <u>5209</u> |
| 4-DIMETHYLAMINOAZOBENZENE | <u>5209</u> |
| ALPHA-NAPHTHYLAMINE | <u>5209</u> |
| BETA-NAPHTHYLAMINE | <u>5209</u> |
| 4-NITROBIPHENYL | <u>5209</u> |
| N-NITROSODIMETHYLAMINE | <u>5209</u> |
| BETA-PROPIOLACTONE | <u>5209</u> |
| BIS-CHLOROMETHYL ETHER | <u>5209</u> |
| METHYL CHLOROMETHYL ETHER | <u>5209</u> |
| 4,4-METHYLENEBIS(2 CHLOROANILINE)MBOCA | 5215 |
| ETHYL ENFIMINE | <u>5209</u> |

NAME OF CARCINOGEN

CODE SECTION

ASBESTOS

**1529, 5208,
5208.1, 8358**

VINYL CHLORIDE

5210

COKE OVEN EMISSIONS

5211

1,2,DIBROMO-3-CHLOROPROPANE(DBCP)

5212

ACRYLINOTRILE

5213

INORGANIC ARSENIC

5214

ETHYLENE DIBROMIDE(EDB)

5219

ETHLENE OXIDE(ETO)

5220

FORMALDEHYDE

5217

BENZENE

5218

Hearing Conservation Program

§ 5097

- **Equipment calibration (No calibration/records missing or incomplete) (5097 (b)(2)(D))**
- **No re-monitoring**
 - **Monitoring shall be repeated whenever a change in production, process, equipment or controls increases noise exposures (5097 (b)(2)(D)(3))**
- **Administrative controls/PPE not enforced (3203)**
- **Inadequate warning signs (3340)**

Medical Services and First Aid

§3400

- Adequately trained first aid personnel to render first aid. (3400 (b))
- Adequate first-aid materials, approved by the consulting physician, readily available. (3400 (b))

Personal Protective Equipment

- §3381. Head Protection. §3382. Eye and Face Protection.
 - §3383. Body Protection. §3384. Hand Protection.
 - §3385. Foot Protection. §5098. Hearing Protectors.
 - §5144. Respiratory Protective Equipment.

- Opportunity to select hearing protectors from a variety of suitable protectors. (5098 (a)(3))
- The employer shall select respirators from a sufficient number of respirator models and sizes so that the respirator is acceptable to, and correctly fits, the user. 5144 (d)(1)(D)
- Audiometric testing within 6 months of an employee's first exposure at or above the action level. (5097 (c)(8))
 - Exception: mobile lab (1yr & hearing protector)
- PPE Policy enforcement policy (subs, visitors) (3203)
- Corrective lenses for eye shields and air-purifying & atmosphere supplying respirators 3382 (c)
- Annual Program evaluation (5144 (l))
- SCBA's are not regularly donned as part of training (5144 (k))

Fire Protection/Fire prevention

- written Fire Prevention plan (§ 3221)
- Fire Extinguishers (§ 6165)

Improper Type & placement, (6151 (c)(1))
Monthly visual (6151 (e)(2))
Annual maintenance (6151 (e)(3))

- Inadequate training of assigned employees (initial/annual)

(6151 (g)(1)) Where the employer has provided portable fire extinguishers for employee use in the workplace, the employer shall also provide an educational program

CBT v. Hands on

Fire Protection 6150-6184

Standpipe & Hose System: small hose, Class II, and Class III standpipe systems. (6165/NFPA 141978)

- standpipe systems for use by employees

shall be equipped with appropriate hose and pressure (6165 (d)(B)&(c))

Automatic Sprinkler Systems (CCR 6170/NFPA 13)

- main drain flow test: Annual (6170 (c)(2)(A))
- Inspector test subject: every 2 years (6170 (c)(2)(A))
and according to AHJ's
- NFPA required 5-year inspection certificate (NFPA and AHJ)
- Inadequate documentation of tests
- Only inspector test done not main drain test
- Inaccessible or shut sprinkler system risers, inspector test valves,
- Employees are not knowledgeable of shut off valve locations
- Abandoned fire protection systems, hoses, etc
- Lack of spare sprinkler heads

Housekeeping/Flammable Liquids,

- Poor overall housekeeping (note, §3272. Aisles, Walkways, and Crawlways. 3273 working areas)
- Improper Flammable liquids indoor quantity & Location (5533 (a))
 - Inventory reduction
- Outside propane tank Storage, Handling, and Use of Cylinders (4650)
 - (PPE, permit, JHA)
- Venting of indoor flammable cabinets (5533 (a))

