

April 2022

Injury and illness records— Form 300A

At the end of each calendar year, all employers that are required by the Occupational Safety and Health Administration (OSHA) to keep injury and illness records must review the OSHA 300 Log to verify that all entries are complete and accurate and compile a summary of the information onto the OSHA Form 300A (Summary of Work-Related Injuries and Illnesses).

The Form 300A includes the following information:

- Establishment name and address;
- Establishment industry description and Standard Industrial Classification (SIC) or North American Industry Classification System (NAICS) code;
- Annual average number of employees;
- Total hours worked by all employees over the course of the calendar year;
- Totals for the number of deaths, cases with days away from work, cases with job transfer or restriction, and other recordable cases for the establishment over the course of the calendar year;
- Totals for the number of days away from work and days of job transfer or restriction over the course of the calendar year;
- Totals for each injury and illness type listed on the OSHA 300 Log (injuries, skin disorders, respiratory conditions, poisonings, hearing loss, and all other illnesses); *and*
- Signature, job title, and phone number of the company executive who certifies the report.

A company executive must certify that he or she has examined the OSHA 300 Log and believes that the information as summarized on the Form 300A is correct and complete.

From February 1 to April 30 each year, the Form 300A for the previous calendar year must be posted in a prominent location for employees to view.

Safe driving—Avoiding collisions

According to the National Safety Council (NSC), motor vehicle-related deaths occur more often in collisions between motor vehicles than any other type of incident. Single-vehicle collisions with fixed objects or pedestrians result in fewer significant injuries, including death. Even when collisions do not result in death or injury, damage to vehicles can be extensive and costly. Fortunately, there are steps you can take to avoid and/or reduce vehicle collisions.

Before you get on the road. The condition of your vehicle is a contributing factor to preventing collisions. Before you get on the road, note whether your vehicle has been properly maintained and whether your equipment is defective or properly working. Bad tires; faulty brakes; and, if applicable, an improperly functioning collision avoidance warning system are important elements that could contribute to a collision. If you're driving a truck with cargo, remember that improperly loaded or secured cargo can shift and affect the truck's stability or handling.

Impatience. Impatience is often considered the most common driving error and the one that leads to many other errors. If you are impatient, you are prone to taking risks you shouldn't, such as speeding, tailgating, and impulsively changing lanes. Impatience is often the result of a lack of preparation. For example, you may make dangerous driving choices if you haven't left enough time to reach your destination, if you haven't planned your route, or if you haven't checked the weather or local traffic information.

Distraction. It's easy to be distracted and lose your focus when you're on the road, especially if you have a long and perhaps boring drive ahead. Distractions include the most obvious one, which is using your cellphone for calls, browsing, or texting. Other distractions include eating and drinking, adjusting the radio or navigation system, not looking at the road, and zoning out. There's evidence that shows that drivers whose attention is diverted away from driving for more than 2 seconds at a time are at an increased risk of a crash.

Impairment. The most common impairment to safe driving is alcohol or other drugs, but there are nonchemical conditions that can also impair your driving. Fatigue, stress, and illness can affect your reaction time and ability to make correct driving decisions. For example, some studies have shown that fatigue can be just as dangerous as alcohol impairment. So be sure you're well rested and healthy before you drive.

Speed. Driving too fast is one of the main causes of collisions. Speed decreases both your reaction time and your ability to control your vehicle. The NSC has stated that for every 10 miles per hour (mph) over 50 mph, you double the risk of injury and death, as speed contributes to the severity of the collision impact. Overall, the most important action you can take to avoid a collision is to slow down and increase the distance between you and other vehicles.

Respiratory protection program

In any workplace where respirators are necessary to protect the health of employees or whenever respirators are required by the employer, the employer must establish and implement a written respiratory protection program with worksite-specific procedures. The program must be updated as necessary to reflect changes in conditions and must be administered by a trained administrator.

The employer must establish and implement those elements of a written respiratory protection program necessary to ensure that any employee using a respirator voluntarily is medically able to use that respirator and that the respirator is cleaned, stored, and maintained so that its use does not present a health hazard to the user.

The program must include provisions for:

- Procedures for selecting respirators in the workplace;
- Medical evaluations of employees required to use respirators;
- Fit-testing procedures for tight-fitting respirators;
- Procedures for proper use of respirators in routine and reasonably foreseeable emergency situations;
- Procedures and schedules for cleaning, disinfecting, storing, inspecting, repairing, discarding, and otherwise maintaining respirators;
- Procedures to ensure adequate air quality, quantity, and flow of breathing air for atmosphere-supplying respirators;
- Employee training in the respiratory hazards to which they are potentially exposed during routine and emergency situations;
- Employee training in the proper use of respirators, including putting them on and removing them, any limitations on their use, and their maintenance; *and*
- Procedures for regularly evaluating the effectiveness of the program.

OSHA inspections—What to expect: QUIZ

1. OSHA compliance officers are only trained on health hazards. TRUE or FALSE.
2. During the inspection walk-through, the compliance officer may point out observed violations that can be immediately corrected. TRUE or FALSE.
3. Which of the following criteria has the highest priority to prompt an OSHA inspection?
 - A. Severe injuries and illnesses
 - B. Worker complaints
 - C. Imminent-danger situations
 - D. Referrals
4. Which of the following apply to inspections? Choose all that apply.
 - A. They cannot be requested by someone at the facility.
 - B. They may be initiated by OSHA.
 - C. They may be announced beforehand.
 - D. They do not come as a surprise to facility personnel.

ANSWERS

1. FALSE. 2. TRUE. 3. C. 4. B. & C.



OSHA inspections-What to expect

OSHA inspectors, also known as compliance officers, are trained on health hazards, safety hazards, or both. Inspections may be requested by someone at the facility or initiated by OSHA. Inspections may be announced beforehand or may come as a surprise to facility personnel.

Because of the vast number of facilities under its jurisdiction, OSHA prioritizes inspections for the most hazardous. The criteria most likely to prompt an OSHA inspection include, in order of priority:

- **Imminent-danger situations.** Hazards that could cause death or serious physical harm are OSHA's top priority. Compliance officers will require these hazards to be corrected immediately, or endangered employees will be removed from the area.
- **Severe injuries and illnesses.** These may include work-related fatalities, inpatient hospitalizations, amputations, or the loss of an eye.
- **Worker complaints.** Complaints submitted to OSHA of hazardous conditions or violations of standards are also treated as a high priority.
- **Referrals.** Hazardous conditions communicated to OSHA by other federal, state, or local agencies, individuals, organizations, or media will receive consideration for inspection.
- **Targeted inspections.** Inspections may focus on specific industries or facilities that have high rates of injury and illness.
- **Follow-up inspections.** In some cases, OSHA also performs follow-up inspections to ensure previously cited violations have been resolved.

An OSHA inspection will include a walk-through of the workplace. During the walk-through, the compliance officer may point out observed violations that can be immediately corrected.

After the walk-through is finished, the compliance officer will meet with the facility representative(s) to discuss the inspection findings.

Managing universal waste—Mercury-containing equipment: QUIZ

1. **MCE** can be thrown into the trash.

TRUE or FALSE.

2. You must label or mark the containers holding the **MCE** as soon as the first **MCE** device is placed in the container.

TRUE or FALSE.

3. A universal waste handler that accumulates less than _____ kg of universal wastes at any time is considered a small quantity handler of universal waste.

A. 5,000

B. 7,000

C. 10,000

D. 15,000

4. How many years can universal waste **MCE** be stored at a facility?

A. 1 year.

B. 2 years.

C. 3 years.

D. There is no time limit.

5. A container holding only mercury-containing thermostats can be marked differently than containers holding other **MCE**.

TRUE or FALSE



Managing universal waste—Mercury-containing equipment

If you are a small quantity handler of universal waste (i.e., a universal waste handler that accumulates less than 5,000 kilograms (kg) total of universal wastes at any time), your facility must manage hazardous waste mercury-containing equipment (MCE) as universal wastes and follow the very specific universal waste requirements. This means that MCE cannot be thrown into the trash.

Management standards

Before being sent for recycling, here's what you need to do:

- Place the MCE in the containers that your facility has chosen to store it.
- Keep the container closed unless adding or removing the MCE.
- Be sure containers lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
- Place in a container any MCE with non-contained elemental mercury or that shows evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions.
- Label or mark the containers holding the MCE with these words as soon as the first MCE device is placed in the container:
 - “Universal Waste—Mercury-Containing Equipment,”
 - “Waste Mercury-Containing Equipment,” *or*
 - “Used Mercury-Containing Equipment.”
- If the container only holds mercury-containing thermostats, the container can be marked:
 - “Universal Waste—Mercury Thermostats,”
 - “Waste Mercury Thermostats,” *or*
 - “Used Mercury Thermostats.”
- Periodically check the containers or inventory log to make sure the MCE is not past the 1-year storage time limit.

Time limit

Universal waste MCE has a storage time limit of 1 year at a facility. The 1-year time period is measured from the time the waste is generated, meaning from the date the MCE becomes a waste. This requirement is met by:

- Placing the MCE in a container that is marked or labeled with the earliest date that any universal waste in the container became a waste,
- Marking or labeling each individual MCE device with the date it became a waste, *or*
- Maintaining an inventory system that identifies the date each MCE device became a waste or the earliest date that an MCE device in a group of MCE devices became a waste.

Response to releases

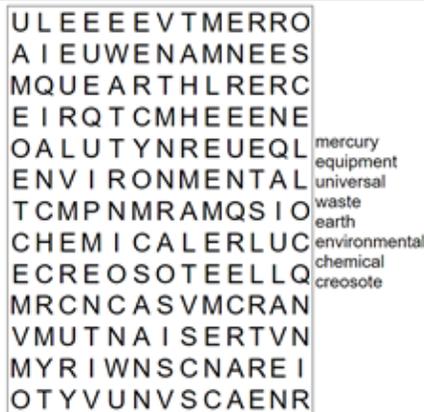
If a release of mercury occurs, you should:

- Immediately contain all releases of mercury and mercury residues.
- Determine whether any material resulting from the release, including cleanup materials, is hazardous waste, and, if so:
 - Manage the hazardous waste in compliance with the hazardous waste standards.
 - Comply with the requirements applicable to hazardous waste generators.

Following these procedures will ensure that your facility is properly managing this potentially dangerous waste.

Managing universal waste— Mercury-containing equipment: ANSWERS

1. **FALSE.** MCE must be managed as universal waste.
2. **TRUE.** You must label or mark the containers holding the MCE as soon as the first MCE device is placed in the container.
3. **A.** A universal waste handler that accumulates less than 5,000 kg of universal wastes at any time is considered a small quantity handler of universal waste.
4. **A.** Universal waste MCE has a storage time limit of 1 year at a facility.
5. **TRUE.** A container holding only mercury-containing thermostats can be marked differently than containers holding other MCE and use the words “mercury thermostats” instead of MCE.



Earth Day 2022—Invest in Our Planet

Since 1970, Earth Day has been celebrated on April 22 to inspire awareness and appreciation for the Earth's natural environment. April 22 corresponds to spring in the Northern Hemisphere and autumn in the Southern Hemisphere. Earth Day is recognized as the largest secular observance in the world, marked by more than a billion people every year as a day of action to change human behavior and create global, national, and local policy changes. Organized by EARTHDAY.ORG, the theme for 2022 is “Invest in Our Planet,” which calls for everyone—business, governments, and citizens—to be accountable and act on solving the climate crisis.

Here are some actions and tips to make a difference not only on Earth Day but also throughout the year:

- Support the Great Global Cleanup (www.earthday.org/campaign/cleanup) and pick up trash while enjoying your outdoor activities.
- Compost your food waste by burying the scraps at least 8 inches in the ground and covering with dirt. There are also convenient composting bins and tumblers you can purchase.
- Visit www.carbonfootprint.com to calculate your personal carbon footprint and make changes to reduce it.
- Buy reusable shopping bags instead of using single-use grocery bags.
- Integrate a simple act of green into your daily routine: Take a shorter shower and use a water-saving shower head.
- Change your paper bills to online billing.
- Limit the use of pesticides in your garden to protect pollinators like bees.
- Avoid single-use plastic items, and if possible, buy products in glass or paper.
- Donate your old clothes and home goods instead of throwing them out. When you need something, consider buying used items.

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Chemical spotlight: Creosote

Creosote is a yellowish to dark brown, oily liquid produced from the heating and separation of coal tar. It is used in construction (roofing), in railroad and utilities industries, and for wood treatment and waterproofing. Store creosote in tightly closed containers in a cool, well-ventilated area. Creosote is not compatible with oxidizing agents, strong acids, strong bases, aliphatic amines, and isocyanates. Sources of ignition, such as smoking and open flames, are prohibited where creosote is used, handled, or stored.

If creosote is spilled or leaked, avoid breathing vapors, mist, or gas, and ensure adequate ventilation. Remove all sources of ignition and evacuate personnel to safe areas. Use personal protective equipment (PPE), including goggles or safety glasses, gloves, flame-retardant protective clothing, and respiratory protection.

Prevent further leakage or spillage if safe to do so, and do not let the product enter drains, sewers, underground or confined spaces, groundwater, or waterways or discharge into the environment. For small spills, absorb creosote with vermiculite, dry sand, or earth, and deposit in sealed containers. Ventilate and wash the area after cleanup is complete. It may be necessary to contain and dispose of creosote as a hazardous waste. Contact the federal and local Environmental Protection Agency (EPA) for specific recommendations.