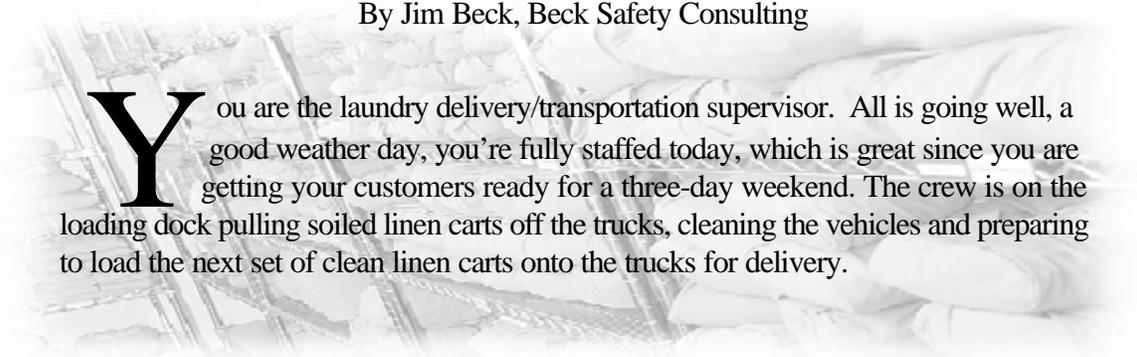


Job Hazard Analysis

Be a Safety Detective

By Jim Beck, Beck Safety Consulting



You are the laundry delivery/transportation supervisor. All is going well, a good weather day, you're fully staffed today, which is great since you are getting your customers ready for a three-day weekend. The crew is on the loading dock pulling soiled linen carts off the trucks, cleaning the vehicles and preparing to load the next set of clean linen carts onto the trucks for delivery.

As Joe, with six years experience as the main delivery/customer services representative, is unloading the last soiled linen cart onto the truck ramp to the loading dock somehow the cart gets away from him, rolls down the ramp and runs into Sam on the dock. Sam is okay, the cart didn't knock him down but it hit his foot pretty hard before he could get it out of the way. He is able to shake it off and after a couple of anxious minutes everyone continues with their work.

The situation is still on your mind when you run into Sam later that day in the lunchroom. Concerned, you inquire if he is okay and he assures you he is fine but notes that he is glad that he wears steel toe shoes as he believes that prevented the injury.

Does OSHA require loading dock personnel to wear steel toe shoes? What about the delivery guys who drive the trucks and deliver and pick up carts for customers...are they required to wear steel toe shoes? Has a near-miss happened before? Has anyone at the facility been hurt in this manner?

You utilize the tools at your disposal and visit OSHA's on-line website (www.osha.gov) and query "steel toed shoes". You are directed to an OSHA standard 29 CFR 1910.136. After reading this "general requirement" you still don't know if this applies to you or not! A

safety consultant you have come to rely on says this is a prime opportunity to complete a Job Hazard Analysis.

The purpose of the job hazard analysis is to help employees and supervisors identify the hazards associated with activities and tasks, assess the risk associated with these hazards, and control that risk to an acceptable level. The overall goals are to prevent injuries and illnesses, reduce property damage, supplement existing safety requirements, and enhance employee training on new, existing, and modified tasks.

To start –

Gather a team of employees impacted by the issue that you want to study. In this case, that might be Joe; plus someone who loads the trucks, a person who counts and/or stages the carts for loading; include one of the delivery/customer service drivers; the shift supervisor can provide another perspective and including the production supervisor will round out the team.

Discuss what you're going to do and why. Explain that the group will be studying a task, not looking at employee performance. Involving the employees in the entire process will provide a practical approach to problem solving, provide you with a reality-based solution(s) and you will obtain their "buy-in" to the solution.

Fact Finding –

Review the company’s accident, injury, illness, and near miss history to determine if this concern or a similar occurrence has been an issue in the past. You will want to thoroughly research the OSHA standards to see if there are any applications to this job. You will want to incorporate OSHA’s requirements into your job hazard analysis. What are the existing company policies that impact this job; is the use of personal protective equipment required?

Identify the problem(s) –

The team will need to break the job/task down into steps. This can be accomplished by observing someone perform the task. Watching the worker actually complete the job and list each step in the order that it occurs is a very accurate method. When recording the steps, begin each with a verb such as, “dislodge the lock on the cart wheel”. Don’t make it too broad or too detailed. It often helps to photograph or video tape this procedure. Finally review the steps with multiple workers, asking them to complete the same job to make sure you haven’t omitted anything and to determine if different methods are utilized.

Analyze the hazards of each step -

For each of the steps identified in the job task ask the team...What can go wrong? What are the consequences? How could it happen? Are there other contributing factors? And how likely is it that the hazard will occur? Review these hazards with the group and with other employees who do the job. Discuss what could eliminate the hazard or reduce them.

Tips to identify ways to eliminate or reduce the hazards:

- Is there a safer way to do the job?
- Describe each step.
- Be specific, don’t generalize such as “Be Careful”.
- Can there be changes made to equipment?
- Engineering controls or equipment changes are often
- the first choice because they can often eliminate the hazard.

- Changes in equipment: Treads on ramps, changing the types of wheels on the carts;
- Changes in work processes: two people to perform the task, less people on the dock;
- Administrative controls, or changes in how the task is done can be used if engineering controls are possible.
- Rotating jobs, changing the order of the steps, training.
- Changes in personal protective equipment.
- When engineering and administrative controls are not possible or don’t adequately protect the workers, use of personal protective equipment such as gloves, steel toe shoes, etc. may be a solution.

Follow through with the groups’ recommendations. Make sure everyone who is assigned to this job is trained on how to implement the changes and make sure they understand the changes. Asking them to perform the job task by demonstration is an excellent way to assure that communication is clear. Training and retraining may be required especially if the old methods were used for a long period of time. Supervisors should be attentive to the new job and take time to make sure the changes are fully implemented and effective. And don’t forget to document procedure changes, training and competency.

Now that you’ve worked through the process, you can utilize the Job Hazard Analysis to determine if there are other areas in your facility that could be problematic. Don’t wait until you or another worker witnesses a “close call” before looking into methods to improve the safety at your facility. And definitely you don’t want to wait until someone is injured before looking into ways to improve practices. Having identified areas you want to address through a Job Hazard Analysis, prioritize the issues. This can be accomplished by giving priority to:

- Jobs with the highest injury or illness rates;
- Jobs where there have been close calls, where an incident occurred but no one got hurt;
- Jobs where you have identified violations of the OSHA standards.

- Jobs with the potential to cause serious injury or illness, even if there is no history of such problems;
- Jobs in which one simple human mistake could lead to severe injury;
- Jobs that are new to your operation or have been changed.
- Jobs complex enough to require written instructions.

Returning to our scenario of the steel toe shoes refer to the OSHA final rule published 11/15/2007 entitled: **Employer Payment for Personal Protective Equipment; Final Rule.** While not applicable to all PPE (i.e. employers must pay for gowns and gloves as protection from bloodborne pathogens) this ruling addresses the following highlights applying employer payment for steel toe shoes:

“After careful consideration of the comments, OSHA has decided to retain the exceptions for non-specialty safety-toe protective footwear and non-specialty prescription safety eyewear in the final PPE payment standard. The Agency [OSHA] believes that these two items have unique characteristics that continue warrant exemption from employer payment.”

However, “The proposal would have placed conditions on these exemptions: (1) The employer permits such footwear or eyewear to be worn off the jobsite; (2) the footwear or eyewear is not used at work in a manner that renders it unsafe for use off the jobsite; and (3) such footwear or eyewear is not designated for special use on the job.” This does not prohibit the employer from paying for steel toe shoes, but OSHA does not require it if the conditions are met.

About the author:

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Jim has thirty-six years of experience in the industrial and residential construction industry, with primary emphasis on safety and training. Mr. Beck has been teaching adult safety education since 1983. Mr. Beck has developed and presented adult education programs for representatives of the Department of Defense (DOD), Department of Energy (DOE), and the Environmental Protection Agency (EPA). In previous employ as the Director of Safety and Health, Mr. Beck was responsible for OSHA, DOT and EPA compliance.

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