

OSHA and Chiropractic Providers

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OBJECTIVES

- Brief Discussion of the OSHA Program
- Compliance with the "new" global harmonization system (Hazard Communication)
- Hazards associated with office settings
- Effective compliance with OSHA regulations

OSHA doesn't pertain to us because we have fewer than 10 employees.

- 1. True
- 2. False

OSHA Jurisdiction

- Covers employees or people compensated for work done
- True Volunteers not covered
- Independent Contractors?
- Self Employed?

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Enforcement

- (Regulatory Compliance)
- Fines
- Not confidential

Consultation

- (Voluntary Compliance)
- No Fees or Penalties
- Confidential

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Inspection Priorities (Enforcement)

Unprogrammed Inspections

- Imminent Danger
- Fatality/Catastrophe Investigations
- Complaints/Referrals
- Accidents/Amputations

Programmed Inspections

YOUR OPTIONS ARE

- Let The Inspection Proceed
- Ask The Inspector To Wait (1 hr. max.)
- Require A Warrant To Proceed

A Good Place To Start

- Follow the operator's manual
- Don't use "defective equipment"
- Review the information on the OSHA web page
- Bring in OSHA Consultation

Complaints by employees

Section 11(c) of the Act provides:

"No person shall discharge or in any manner discriminate against any employee because such employee has filed any complaint or instituted or caused to be instituted any proceeding under or related to this Act or has testified or is about to testify in any such proceeding or because of the exercise by such employee on behalf of himself or others of any right afforded by this Act."

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<u>Criminal Willful</u>	Courts
<u>Willful</u>	
-maximum	\$70,000
-minimum	\$5,000
<u>Repeated</u>	
-maximum	\$70,000
<u>Serious, Other-than-Serious</u>	
-maximum	\$7,000
<u>Failure to Abate</u>	
-maximum	\$7,000/day
<u>Poster, and OSHA 300 violations</u>	\$1,000
<u>Posting Citations</u>	\$3,000
<u>Reporting Fatality/Catastrophe</u>	\$5,000

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The required postings
available at
<http://www.iowaworks.org/reqposters.htm>



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Required Programs and Documentation

- OSHA 300 Injury and illness log with 10 or more employees, NOT low hazard, and/or asked to keep one.
- Sharps Log
- Some written programs (hazard assessment; emergency action; fire prevention; haz. com.; exposure control; lockout, tagout.
- Training
- Operator's Manual or Operating Instructions

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Employers must assess the workplace for hazards

- Conduct and document the assessment
- Eliminate/Protect employees from the hazards
- Provide, Document, and Train employees on personal protective equipment (PPE)

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Certificate Of Hazard Assessment Pursuant To 29 C.F.R. 1910.132

I, _____, certify that (*name of facility*) was evaluated on ___ (*date*)
for hazards which are present, or are likely to be present, which necessitate the
use of personal protective equipment.

Signature

Date

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Emergency Action Plans

- Written – more than 10 employees Fires, Tornados, etc.
- Procedures for: reporting emergencies, evacuation, critical operations, accounting for employees, medical, rescue, alarms, training, and responsible person
- www.osha.gov/SLTC/etools/evacuation/index.html
- Fire Prevention Plan – Written, more than 10 employees
- Fire Extinguishers - Fight or Flight? Train annually.

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Identify all exists (unless obvious)



Hazard Communication or Right to Know 1910.1200

- Do you have hazardous chemicals?
- Consumer products may not be included if...
 - Consumer product
 - Consumer amount
 - Used in the same manor
- Do your employees have potential exposure to them?
- Acquire Material Safety Data Sheets (MSDS'S or SDS's now)
- Have a list of hazardous chemicals
- Train your employees
- Label all containers of H. C.



Develop written program

- Sample/Model program
- www.osha.gov/Publications//osha3186.html
- Both Hazard Communication and Bloodborne/Exposure Control Plan.
- Does your office need a Hazard Communication/Right to Know program? (yes or no)

Employee Training

- Before exposure
- Hazards of the chemical
- Symptoms of over-exposure
- How to protect against exposure (PPE)
- Addition info



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Label Example



Nine pictograms Eight are mandatory for OSHA

HCS Pictograms and Hazards		
Health Hazard <ul style="list-style-type: none"> • Carcinogen • Mutagenicity • Reproductive Toxicity • Respiratory Sensitizer • Target Organ Toxicity • Aspiration Toxicity 	Flame <ul style="list-style-type: none"> • Flammables • Pyrophorics • Self-Heating • Emits Flammable Gas • Self-Reactives • Organic Peroxides 	Exclamation Mark <ul style="list-style-type: none"> • Irritant (skin and eye) • Skin Sensitizer • Acute Toxicity (harmful) • Narcotic Effects • Respiratory Tract Irritant • Hazardous to Ozone Layer (Non-Mandatory)
Gas Cylinder <ul style="list-style-type: none"> • Gases under pressure 	Corrosion <ul style="list-style-type: none"> • Skin Corrosion/ Burns • Eye Damage • Corrosive to Metals 	Exploding Bomb <ul style="list-style-type: none"> • Explosives • Self-Reactives • Organic Peroxides
Flame Over Circle <ul style="list-style-type: none"> • Oxidizers 	Environment (Non-Mandatory) <ul style="list-style-type: none"> • Aquatic Toxicity 	Skull and Crossbones <ul style="list-style-type: none"> • Acute Toxicity (fatal or toxic)

Label all Containers with at least Two Pieces of Information

- Name of chemical or solution
- Hazards of the chemical



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Labeling Cont.



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Compressed Gasses are Hazardous



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Bloodborne Pathogens 1910.1030
Exposure Control Plan

- **Do your employees have reasonably anticipated exposure?**
- **If yes, you will need an exposure control plan**
- **Provide annual training**
- **Provide personal protective equipment**
- **Follow all other requirements in your written plan**

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Sharps Container

- **Don't overfill**
- **Don't put anything but sharps in the container**



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Over filled!



Eyewash requirements

- 1910.151(c)
- Where the eyes or body may be exposed to injurious corrosive materials, suitable facilities for....
- Bleach or concentrates
- Squirt bottles are not approved for an eye wash station.



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How do you know if a chemical is corrosive?

Choose the BEST answer.

1. Call OSHA and ask.
2. The solution irritates the skin in a diluted form.
3. Test it with litmus paper.
4. The word corrosive will describe the product on the msds.

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Electrical Hazards



Blocked



Exposed

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Ground fault circuit interrupter (GFCI)



All bathrooms

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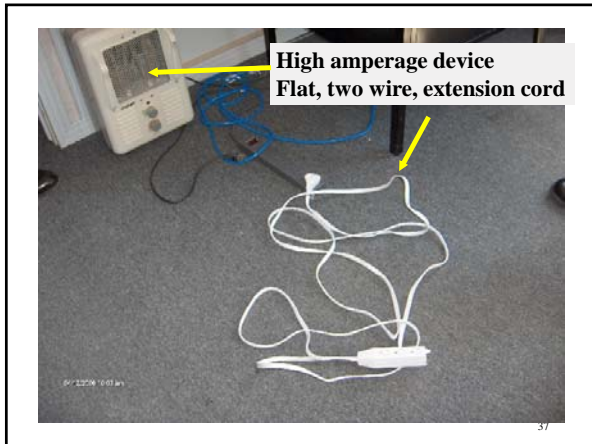
Use a tester to verify correct wiring

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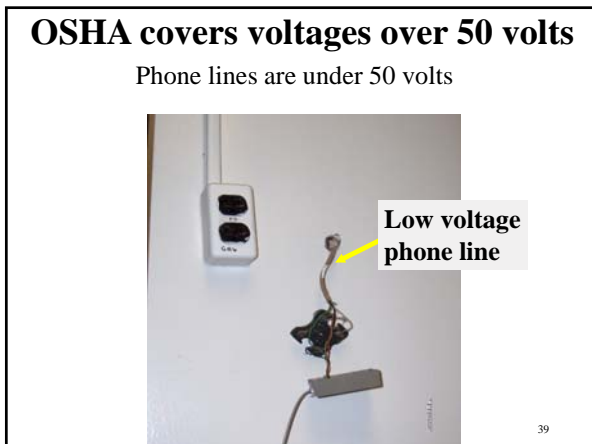
Tick Tracer – identifies energized wires/devices

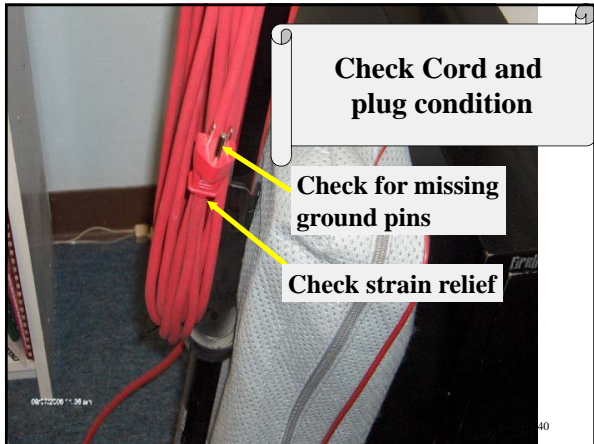


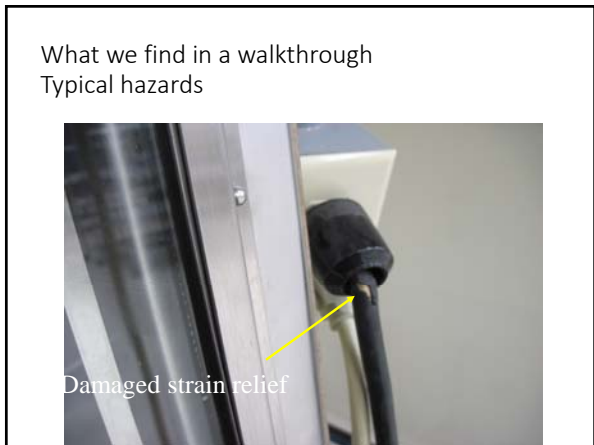
36





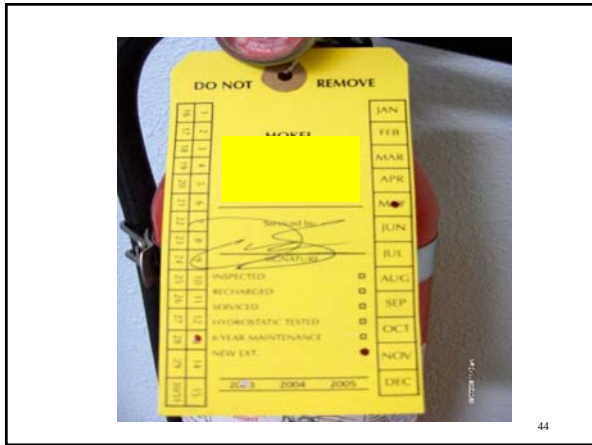


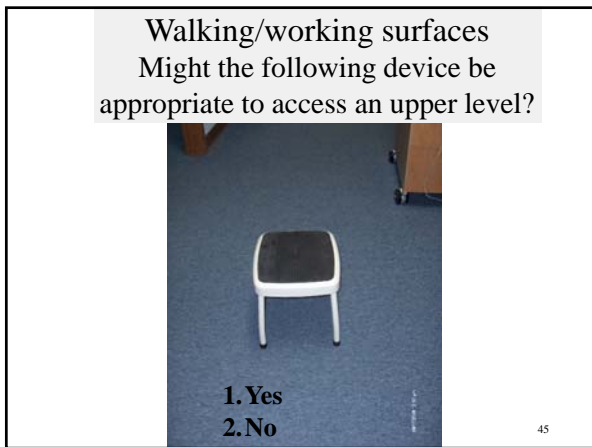
















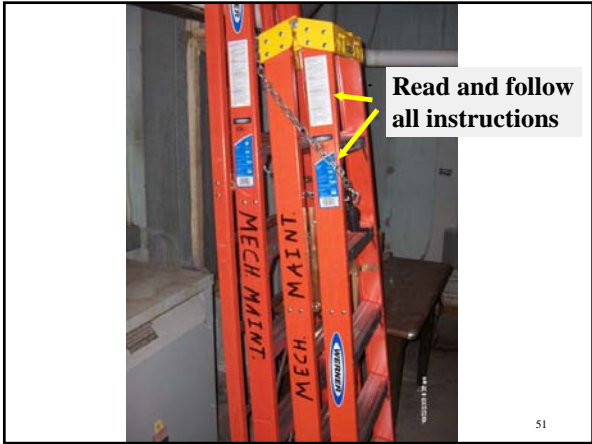




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**Read and follow
all instructions**

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Slips, trips, and falls
cover - protect



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**Open sided stairs need a stair rail
& hand rail (four or more risers)**



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Four risers

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Do employees change light bulbs or work on equipment?

- Training is very important
- Cord and plug (not hard wired) is easy to secure.
- Equipment needs to be secured and safe to work on.
- All energy needs to be at zero state.
- Don't forget about gravity, springs, capacitors.

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Fixing, repairing, or altering equipment shifts liability and is probably citable by OSHA



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First Aid Kit
good idea



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Other Hazards

Ergonomics

- No OSHA standard, but do hazards exist?
- Lifting
- Typing

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Violence

- No standard
- Do employers need to provide training?
- Significant recognized hazard?

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Disclaimer

All Hazards have not been covered!

THANK YOU

QUESTIONS?

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