

Workplace Health and Safety Manual

Western North Carolina Workers' Center

1st Edition

www.wncworkerscenter.org

OSHA

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It is not possible to include discussion of everything necessary to ensure a health and safe working environment in a manual of this nature. Thus, this information must be understood as a tool for addressing workplace hazards, rather than an exhaustive statement of an employer's legal obligations, which are defined by statute, regulations, and standards. Likewise, to the extent that this information references practices or procedures that may enhance health or safety, but which are not required by a statute, regulation, or standard, it cannot, and does not, create additional legal obligations.

Finally over time, OSHA rules and interpretations may be modified in light of new technology, information, or circumstances; to keep apprised of such developments, or to review information on a wide range of occupational safety and health topics, visit OSHA's website at www.osha.gov.

The Small Group Activity Method

Basic Structure

The Small Group Activity Method is based on activities. An activity can take from 45 minutes to an hour. Each Activity has a common basic structure:

- **Small Group Tasks**
- **Report-Back**
- **Summary**

Small Group Tasks: Activities include tasks (problems), or sets of tasks, for the groups to work on. Each task asks that groups use their experience and the factsheets to solve problems and make judgments on key issues.

Report-Back: For each task, groups select scribes that take notes on the small group discussions and report back to the class as a whole. During the report-back the scribe informs the entire class as to how his or her group solved the particular problem. The trainer records each scribe's report-back on large pads of paper in front of the class so that everyone can refer to them.

Summary: Before the discussion drifts too far, the trainer needs to bring it all together during the summary. Here, the trainer highlights the key points of the Activity and brings up any problems or points that may have been overlooked during the report-back.

Three Basic Learning Exchanges

The Small Group Activity Method is based on the idea that every training is a space where learning is shared. With SGAM, learning is not a one-way street that runs from trainer to worker. Rather, SGAM is a structured procedure that allows us to share information. It is based on three learning exchanges:

- **Worker-to-Worker**
- **Worker-to-Trainer**
- **Trainer-to-Worker**

Worker-to-Worker: Most of learn best from each other. SGAM is structured so that the worker-to-worker exchange is a key element of the training. The worker-to-worker exchange allows participants to learn from each other by solving problems in their small groups.

Worker-to-Trainer: Lecture-style training assumes that the trainer knows all the answers. With SGAM it is understood that the trainers also have a lot to learn and this is the purpose of the worker-to-trainer exchange. It occurs during the report-back and it is designed to give the trainer an opportunity to learn from the participants.

Trainer-to-Worker: This is the trainer's opportunity to clear up confusion and make points they think are key. By waiting until the summary section, trainers know better what people need to know.

OSHA Rights and Responsibilities

Purpose

To learn more about worker/employer rights and responsibilities under OSHA and how we can use OSHA as a tool for eliminating hazards in our workplaces.

This Activity has two tasks.

Task 1

Your group has been asked to make a presentation to a group of poultry processing workers regarding their rights and responsibilities under OSHA. Review the factsheets on the following pages, then working together make a list of key points you will make during the presentation. (Try to support each point with a factsheet)

OSHA Rights and Responsibilities Key Point: (Please make a list)

1.

2.

3.

4.

5.

6.

7.

After you have completed your presentation please answer the following questions.:

1. Have you or your co-workers used OSHA in the past?

If yes, what happened? (Briefly explain the situation and the outcome)

If no, have you been involved in situations where you thought about filing an OSHA complaint? (Briefly explain the situation and why you decided not to call)

2. Are there hazards in the workplace right now that you think need to be eliminated?

If yes, based on your experiences would it make sense to file an OSHA complaint? (Please explain)

3. If your opinion if more workers knew about their rights would they use OSHA to make their jobs safer? (Please explain)

1. What is OSHA and Who Is Covered?

The Occupational Safety and Health Administration (OSHA), is an agency of the U.S. Department of Labor. Congress created OSHA under the Occupational Safety and Health Act of 1970. Prior to 1970, no uniform, comprehensive provisions existed to protect workers against unsafe or hazardous work situations.

OSHA's sole responsibility is to develop mandatory job safety and health standards and enforce them through workplace inspections, employer assistance, and by imposing citations and financial penalties.

OSHA covers all private sector employers and employees, including poultry processing workers as well as workers employed in construction, agriculture, housekeeping among other sectors.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, OSHA 2056, *All About OSHA*, 2000 (Revised) and OSHA Workers Rights 3021-09R 2011.

2. Employer Responsibilities Under OSHA

All employers covered under the Occupational Safety and Health (OSH) Act must do the following:

- Meet their general duty responsibility to provide a workplace free from recognized hazards.

The OSHA General Duty Clause

Section 5(a)(1) of the Occupational Safety and Health Act requires that an 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”

This is known as the OSHA “general duty clause.”

- Keep employees informed about OSHA and safety and health hazards they are exposed to on the job.
- Comply in a responsible manner with standards, rules and regulations issued under the OSH Act

- Be familiar with mandatory OSHA standards
- Make copies of standards available to employees for review upon request.
- Evaluate workplace conditions
- Minimize and/or eliminate potential hazards
- Ensure that employees have and use safe, properly maintained tools and equipment (including appropriate PPE)
- Educate employees about potential hazards
- Provide medical examinations when required
- Provide training required by OSHA standards
- Report within 8-hours any accident that requires in a fatality or the hospitalization of three or more employees
- Keep OSHA-required records of work-related injuries and illnesses
- Post a copy of the OSHA form 300A, the Summary of Occupational Injuries and Illnesses for the prior year annually from February 1 to April 30.

The OSHA 300 Log

OSHA requires employers with more than 10 employees to keep a log of injuries and illnesses in their workplace. This log is called OSHA 300. This log has to contain every injury and illness that resulted in lost workdays, restricted work, transfer to another job, and any other incident that required more than just basic medical care. You have the right to review this log and all logs kept by your employer for the last five years.

- Post, at prominent location within the workplace, the OSHA poster (OSHA 2203) informing employees of their rights and responsibilities
- Provide current and former employees and their representatives with access to the OSHA-300 Log within a reasonable time and in a reasonable manner
- Provide employees with access to their medical and exposure records

- Post OSHA citations and abatement verification notices at or near the worksite
- Abate cited violations within the prescribed period.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, OSHA 2056, *All About OSHA*, 2000 (Revised) and OSHA Workers Rights 3021-09R 2011.

3. Employers Rights

Under the OSH Act employers can do the following:

Seek free advice and off-site consultation

Be involved in job safety and health through industry associations

Request and receive proper identification from OSHA compliance officers and be advised by the compliance officer of the reason for an inspection

Have an opening and closing conference with the compliance officer

Accompany the compliance officer on inspections

File a *Notice of Contest* to dispute inspection results and request an informal settlement agreement process after an inspection

Apply for a variance from a standard's requirement when unable to fully comply with the effective date due to lack of technical expertise and materials and when other proven effective means are in place to protect employees

Take an active role in developing safety and health

Be assured of the confidentiality of any trade secrets

Submit a written request to NIOSH for information on whether any substance in your workplace has potentially toxic effects in the concentrations being used

Submit information or comments to OSHA on the issuance, modification, or revocation of OSHA standards and request a public hearing.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, OSHA 2056, *All About OSHA*, 2000 (Revised) and OSHA Workers Rights 3021-09R 2011.

4. Worker Responsibilities Under OSHA

- Workers covered under the OSH Act should do the following:
- Read the OSHA poster at the job site
- Comply with all applicable OSHA standards
- Follow employer safety and health rules and regulations, and wear or use prescribed protective equipment while engaged in work
- Report hazardous conditions to the appropriate supervisor
- Report any job-related injury or illness to the employer, and seek treatment promptly
- Cooperate with an OSHA compliance officer conducting an inspection
- Exercise your right under the OSH Act responsibly

Workers Cannot Be Cited For OSHA Violations

Workers must follow all applicable standards, rules, regulations and orders issued under the OSH Act. However, OSHA cannot cite workers as individuals for violations.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, OSHA 2056, *All About OSHA*, 2000 (Revised) and OSHA Workers Rights 3021-09R 2011.

5. Workers Rights Under OSHA

Under the OSH Act workers can do the following:

- Review copies of appropriate OSHA standards, rules, regulations and requirements that the employer should have available at the workplace
- Request information (including Safety Data Sheets (SDS) from the employer on safety and health hazards, precautions materials or chemicals used and emergency procedures

- Receive adequate training and information
- Request that the OSHA Area Director investigate hazardous conditions or violations of standards in the workplace
- Have names of employees filing complaints withheld from employers
- Be advised of OSHA actions regarding complaints and have an informal review of any decision not to inspect or to issue a citation
- Have authorized employee representatives accompany the OSHA compliance officer
- Observe any monitoring or measuring of hazardous materials and see any related monitoring or medical records
- Review the OSHA-300 Logs at a reasonable time and in a reasonable manner
- Request a closing discussion following an inspection
- Submit a written request to NIOSH for information on whether any substance in the workplace has potentially toxic effects in the concentrations being used and have your name withheld from the employer
- Object to the abatement period set in a citation issued to your employer
- Participate in hearing conducted by the Occupation Safety and Health Review Commission
- Be notified by the employer if they apply for a variance and testify at a variance hearing and appeal the final decision
- Submit information or comments to OSHA on the issuance, modification or revocation of OSHA standards and request a public hearing

Your Immigration Status Is Not an Issue

All workers are entitled to a safe and healthy workplace regardless of their immigration status. It is the employers' responsibility to provide a safe and healthy workplace as cited in OSHA's General Duty Clause. If the employer doesn't provide a safe and healthy workplace, and it lead to an OSHA investigation, OSHA inspectors will inspect the workplace. But OSHA inspectors are ONLY concerned with workplace health and safety, not a worker's immigration status.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, OSHA 2056, *All About OSHA*, 2000 (Revised) and OSHA Workers Rights 3021-09R 2011.

6. Workers Have Limited Rights To Refuse Unsafe Work

If you are told to do work you believe could lead to death or serious injury, then you can refuse to do that work. However, you are only protected against termination or discipline by the OSH Act, if you can meet the following condition:

- You must have a reasonable belief that there is real, **imminent danger of death or serious injury**
- You should have followed all the appropriate company rules and procedures in requesting that the danger be eliminated before you start the job
- You must have no reasonable alternative
- There must not be enough time to correct the problem through normal OSHA enforcement procedures

If all the above conditions are met and you are punished for refusing to do the work, then you should immediately file a complaint with OSHA.

OSHA Requirements for Imminent Danger

The following conditions must be met before a hazard becomes an imminent danger:

	There must be a threat of death or serious physical harm. “Serious physical harm” means that a part of the body could be damaged so severely that it could not be used or not used very well.
	For a health hazard there must be a reasonable expectation that the toxic substances or other health hazards are present and exposure to them will shorten life or cause substantial reduction in physical or mental efficiency. The harm caused by the health hazard does not have to happen immediately.
	The threat must be immediate imminent. This mean that you must believe that death or serious physical harm could occur within a short time, for example, before OSHA could investigate the problem.

Task 2

A group poultry processing workers from a local poultry plant that debones and cuts chicken have come to you seeking advice with the following case:

Workers have complained that they use knives and scissors that are dangerous and difficult to use, causing pain in their wrists and hands everyday at work after doing the same repetitive motions over and over. In addition, they have never received training in the proper use of these tools. Workers often have to navigate slippery floors to move from one part of the line to another and are exposed to loud noise continuously. Worker have also complained about the strong vapors that come from the chemicals used in cleaning the chicken as it passes through the processing line.

The workers want to know:

- 1. Should they file a complaint if the hazards don't involve "imminent danger" or may not be covered by a specific OSHA standards?**
- 2. Can the poultry workers file a complaint?**
- 3. What will the workers need to do in order to file a complaint?**
- 5. Where can they obtain an OSHA complaint form?**
- 6. What will OSHA do with an online complaint form?**
- 7. How does OSHA conduct a phone/fax investigation?**
- 8. What happens if the employer ignores or fails to act on an OSHA phone/fax investigation?**

9. What happens during an on-site OSHA inspection?

10. Will the immigration status of some of the workers become an issue of concern for OSHA if the workers file a complaint or if there is an on-site inspection?

(NOTE: Use the factsheets on pages ?????? to help you answer the questions

7. How OSHA Prioritizes Complaints

Because its staff and resources are limited, OSHA spends nearly all of its time on the most hazardous workplaces. If your complaint falls into the category of “imminent danger,” OSHA will respond quickly. If your complaint falls into the category of a serious violation where the severity of the hazard could lead to serious injuries or illnesses, OSHA will assign your complaint a “higher priority status” and initiate an investigation/inspection process immediately.

If your workplace has a history of serious violations or your work in an industry that OSHA recognizes as highly hazardous, and your complaint is an obvious violation of a standard, a compliance officer is likely to conduct a phone/fax investigation to quickly solve the problem.

For most of us, it is likely that our complaints will generally be classified by OSHA as something “other than serious.” Most of the time OSHA will try to solve these problems through the phone/fax investigation process. In some situation that might be all that’s necessary.

However, if you have health and safety concerns that would not be give high priority status by OSHA but you still wan an on-site inspection, then you need to think more strategically about how to use OSHA.

OSHA INSPECTION PRIORITIES		
Priority	Category	Definition
First	Imminent Danger	Any condition where there is reasonable certainty a danger exists that can be expected to cause death or serious physical harm immediately or before the danger can be eliminated through normal enforcement procedures.

Second	Fatalities and Catastrophes	Any situation that results in the death of any employee or the hospitalization of three or more employees. Employers must report such catastrophes to OSHA within eight hours.
Third	Complaints	OSHA violations that are not classified as imminent danger and/or situations where the threat of death or serious physical harm is unlikely. Employees may request confidentiality when they file complaints. (Note: Allegations of hazards of violations could also receive high priority)
Fourth	Referrals	Information about hazards from other federal, state, or local agencies, individuals, organizations or the media. (Note: Referrals may also receive consideration for higher priority)
Fifth	Follow-ups	Include checks for abatement or redress of violations cited during previous inspections. Except in unusual circumstances, follow-up inspections will take priority over all programmed inspections with hazards evaluated as other than serious.
Sixth	Planned or Program Investigations	These include inspections aimed at specific high-hazard industries or individual workplaces that have experienced high rates of injuries and illnesses. (Note: These inspections can also receive higher priority.)

Source: OSHA Field Inspection Reference Manual, *Chapter I: Pre Inspection Procedures*

8. Using OSHA Strategically

So when should you file with OSHA? It all depends on the severity of your complaint, your immediate and long-term health and safety objectives, or any number of other issues and concerns that have to be factored into your decision.

When most of us reach the point of calling OSHA it's usually because we have exhausted all other available options. However, because of the way the agency handles complaints, we should try to think about OSHA as more than just an option of last resort.

If the hazard you are concerned about is not covered by a standard or the current standard does not offer much protection, you may want to consider developing an action plan that “pressures” your employer into eliminating the hazard before filing a complaint with OSHA. Threatening to call OSHA may provide your employer with enough incentive to correct the problem.

On the other hand, if your employer has had little contact with OSHA in recent years and is ignoring your threats to call the agency, filing an electronic complaint will prompt an immediate call from the agency and that might be enough to get the hazard eliminated.

How and when you use OSHA will ultimately depend on circumstances that are specific to your workplace. You should always make those decisions in consultation with co-workers and worker centers. Working together you should devise a comprehensive plan of action that uses OSHA to your best advantage.

Things to Consider

- ✓ Does the hazard qualify as imminent danger?
- ✓ Does the hazard violate a specific OSHA standard?
- ✓ Have you threatened to call OSHA in an effort to get the employer to eliminate the hazard?
- ✓ Is the employer refusing to eliminate a known hazard that violates an OSHA standard?
- ✓ Is this a situation where employees have been injured and taken to the hospital for treatment?
- ✓ Is the employer engaging in activities that endanger co-workers, the community, and the environment?
- ✓ Have you exhausted all your options in trying to get the employer to eliminate the hazard?
- ✓ Have all your efforts been documented?

Things to Consider

- ✓ Is the employer refusing to provide required OSHA compliance training?
- ✓ Is the employer knowingly exceeding exposure limits?
- ✓ Can it be documented?
- ✓ Will co-workers support the decision to file a complaint?
- ✓ Will co-workers participate in the inspection?
- ✓ Is the employer making a good faith effort to remedy the problem and reduce to eliminate the hazard?
- ✓ Do your co-workers know and understand the hazards present in the workplace?
- ✓ Does the employer have a history of citations, willful exposures, etc.?
- ✓ Are you confident that an inspection will result in OSHA issuing a citation?
- ✓ Have you considered scheduling a meeting with your co-workers and OSHA staff to review your complaint when you file it?

Your Right to be Free From Retaliation For Asserting Your Rights

Under Section 11(c) of the OSH Act, an employer cannot penalize or discriminate against workers for asserting their right to:

- Complain to the employer, OSHA, your union, or any other government agency about workplace health and safety
- Participate in OSHA inspections, conferences, hearings, and other OSHA activities
- Refuse to do a job if – in good faith – they believe they are going to be exposed to imminent danger

In good faith means that you have sufficient reason to think that there is a risk. This is a very strict standard, so refusal should be a last resort. If there is time, the dangerous condition should be reported to OSHA or another government agency.

10. Filing An OSHA-7 Complaint

If you file an OSHA complaint you will have to complete an OSHA-7 Complaint Form and it must be faxed, mailed or e-mailed to the local OSHA Regional Office.

You can obtain a complaint form by contacting the OSHA area office, going online and downloading the form.

If the complaint meets any of the criteria listed on the next page, it will in most cases result in an OSHA investigation. If an OSHA investigation does not solve the problem, you can still request an OSHA on-site inspection.

If OSHA decides not to inspect, they must notify you in writing and give reasons. You may question this decision with the OSHA area director and regional administrator.

Complaints That Always Result in An OSHA Inspection	
	A written, signed complaint by a current employee or employee representative describing a hazard that is a violation of the law with “reasonable particularity.”
	A complaint (written, e-mailed or telephoned, signed or not) that alleges a physical harm has occurred as a result of the hazard and that it still exists.
	A complaint (written, e-mailed or telephoned, signed or not) that describes an imminent danger situation.
	A complaint about a company in and industry covered by one of OSHA’s local or national emphasis programs or a hazard targeted by one of these programs.
	Inadequate response from an employer who has received information on the hazard through a phone/fax investigation.
	A complaint against an employer with a past history of egregious, willful or failure-to-abate OSHA citations within the past three years.
	A referral from a whistle blower investigation.
	A complaint at a facility scheduled for or already undergoing an OSHA inspection.

Sources: U.S. Department of Labor, Occupational Safety and Health Administration, *Federal OSHA Complaint Handling Process*. AFL-CIO Website, Safety and Health on the Job, *How to File and OSHA Complaint*. Protecting Workers Who Exercise Right, *How to File a Complaint with OSHA*, A Project of the National Committee for Occupational Safety and Health Network, 2000.

11. OSHA-7 Complaint Checklist

Checklist for Completing OSHA Complaint Form	
Use this list as guide. You do not have to answer all of these questions in order to complete a complaint.	
	How many employees work at the site and how many are exposed to the hazards? Note: The form does not include a line to indicate your designated employee representative (or their alternates for other shifts). Make sure you provide this information with your complaint form.
	How and when are the workers exposed?
	What work is performed in the unsafe or unhealthy area?
	What type of equipment is used? Is it in good condition?
	What materials and/or chemicals are used? (Attach Safety Data Sheets)
	Have workers been informed or trained regarding hazardous conditions?
	What process and/or operation is involved?
	What kinds of work are done nearby?
	How often and for how long do workers engage in the task that leads to their

	exposure?
	How long (to your knowledge) has the condition existed?
	Have attempts been made to correct the problem?
	How many shifts work in the area and what times do they start? On what shifts does the hazard exist?
	What personal protective equipment is required by the employer? Is the equipment used by the workers?
	Has anyone been injured or made ill as a result of this problem?
Questions to Consider for Filing Health Hazard Complaints	
	Has the employer conducted any tests to determine if employees are exposed to the hazardous condition or substance?
	What tests are the results of the tests? (Include reports, tests results, etc.)
	What steps has the employer taken, if any, to control the hazard?
	Do any workers have any symptoms that they think are caused by the hazardous condition or substance?
	Have any workers been treated by a doctor for a work-related disease or condition? What was it?

12. OSHA-7 Complaint Form

U. S. Department of Labor
Occupational Safety and Health Administration

Notice of Alleged Safety or Health Hazards

		Complaint Number		
Establishment Name				
Site Address				
		Site Phone	Site FAX	
Mailing Address				
		Mail Phone	Mail FAX	
Management Official				
		Telephone		
Type of Business				
<p>HAZARD DESCRIPTION/LOCATION. Describe briefly the hazard(s) which you believe exist. Include the approximate number of employees exposed to or threatened by each hazard. Specify the particular building or worksite where the alleged violation exists.</p>				
Has this condition been brought to the attention of:		<input type="checkbox"/> Employer <input type="checkbox"/> Other Government Agency(specify)		
Please Indicate Your Desire:		<input type="checkbox"/> Do NOT reveal my name to my Employer <input type="checkbox"/> My name may be revealed to the Employer		
The Undersigned believes that a violation of an Occupational Safety or Health standard exists which is a job safety or health hazard at the establishment named on this form.		(Mark "X" in ONE box) <input type="checkbox"/> Employee <input type="checkbox"/> Federal Safety and Health Committee <input type="checkbox"/> Representative of Employees <input type="checkbox"/> Other (specify)		
Complainant Name				Telephone
Address(Street, City, State, Zip)				
Signature				Date
If you are an authorized representative of employees affected by this complaint, please state the name of the organization that you represent and your title:				
Organization Name: Your Title:				

13. The Online Complaint Form

Most online complaints are handled by OSHA using the phone/fax investigation procedures. If you do not have union representation, and you are worried about confidentiality it may make sense to file your complaint electronically.

You can file an online complaint at
<http://www.osha.gov/pls/osha7/eComplaintForm/html>

OSHA Occupational Safety & Health Administration
U.S. Department of Labor

OSHA 7 online complaint form
Division of Technical Support and Hazard Investigation
OSHA Approval #: 12-19-0004 Expires/Issue Date: 3-30-2009

Please fill out sections 1 through 14. See OSHA 7000 Form 1000 for more information.

1. Complainant Name: _____
2. Title: _____
3. Site City: _____
4. Site State: [Dropdown: CA] _____
5. Site ZIP Code: _____
6. County: _____
7. Mailing Address (if different): _____
8. Management OSHA No.: _____
9. Telephone Number: _____
10. Type of Business: _____
11. Hazard Description: Describe briefly the hazard(s) which you believe exist. Include the approximate number of employees exposed to it. **FORMERLY OSHA 1000.**

12. Hazard Location: Specify the particular building or location where the alleged violation exists.

13. This condition has been brought to the attention of (check all that apply):
 Employer
 Other Government Agency (specify): _____
14. Name(s):
- Employee _____
- Federal Safety and Health Commission Representative of Employee _____
- Other _____

OPTIONAL
The OSH Act does not guarantee the right to request that their names not be revealed in their employer's records. If you wish to request that your name and address, with only those OSHA staff in compliance with a regulatory job's complaint, be kept confidential:
15. Please indicate your desire:
Do NOT reveal my name to my employer
Do NOT reveal my name to the employer

16. Complainant Name: _____
17. Complaint Telephone Number: _____
18. Complaint Mailing Address: _____
Street _____
City _____
State _____
ZIP Code _____
19. Complaint E-Mail Address: _____

20. If you are an authorized representative of employees affected by this complaint, please state the name of the organization that you represent and your title:
Organization Name: _____
Your Title: _____

SEND

Disclaimer for online statements
Potential complainants who do not have the right to file a statement, representation, or certification in any complaint, statement, or certification under Section 10(b) of the OSH Act by a law of not more than \$10,000, or by engagement of not more than 8 hours, if the law:

Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and reviewing and reporting the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (1218-0046), Washington, D.C. 20503.

DO NOT SEND THE COMPLAINT FORM TO OTHER OSHA OFFICES

1 | LABEL | CONTACT INFORMATION | DISCLAIMER |

14. OSHA Investigations

In most cases after OSHA receives a complaint they will conduct a phone/fax investigation. The agency will phone the employer, describe the hazard(s) and then follow-up with a fax letter. The employer has five days to respond, either by denying the hazard exists, or by stating that the hazard has been eliminated or is in the process of being eliminated.

If OSHA determines that the employer's response is acceptable, there will no inspection and the person(s) who filed the complaint will receive a copy of the employer's response. **If the person(s) who signed the complaint is not satisfied, they can still request an on-site inspection.**

An OSHA phone/fax investigation could work to your advantage if the hazard does not involve "imminent danger" and is not covered by an OSHA standard. A call and follow-up letter from the agency might shake the employer up enough and them moving in the right direction.

Below is a sample copy of the letter that OSHA will fax or mail to the employer as part of the investigation.

Re: Complaint No.

Dear: *(Contractor/Employer)*

On *(date)* the Occupational Safety and Health Administration (OSHA) received notice of safety and health hazards at your worksite. We notified you, by telephone of these alleged hazards on *(date)*. The specific nature of the alleged hazards is as follows:

(List of hazards)

We have not determined whether the hazards, as alleged, exist at your workplace; and we do not intend to conduct an inspection at this time. However, since allegations of violations have been made, we request that you immediately investigate the alleged conditions and make any necessary corrections or modifications. Please advise me in writing, no later than *(date)* of the results of your investigation. You must provide supporting documentation of your findings, including any applicable measurements of monitoring results, and photographs which you believe would be helpful, as well as a description of any corrective action you have taken or are in the process of taking.

This letter is not a citation or a notification of proposed penalty which, according to the OSHA Act may be issued only after an inspection of the workplace. It is our goal to assure that hazards are promptly identified and eliminated. Please take immediate corrective action where needed. We encourage employee participation in investigating and responding to any alleged hazard. If we do not receive a response from you by *(date)* indicating that appropriate action has been taken or that no hazard exists and why, an OSHA inspection will likely be conducted....

You are requested to post a copy of this letter where it will be readily accessible for review by all of your employees and return a copy of the signed Certificate of Posting (Attached) to this office. In addition, you are requested to provide a copy of this letter and your response to a representative of any recognized union or safety committee if these are at your facility. Failure to do so may result in an on-site inspection.

The complainant has been furnished a copy of this letter and will be provided a copy of your response. Section 11(c) of the OSH Act provides protection for employees against discrimination because of their involvement in protected safety and health activity.

If you have any question concerning this matter, please contact *(Compliance Officer)* at the address in the letterhead. Your personal support and interest in safety and health of your employees is appreciated.

15. OSHA Inspections

For serious violations, or situation where the employer has failed to act on an OSHA investigation, the inspection should occur within 30 days.

There are three parts to an OSHA on-site inspection including an Opening Conference, Walk Around and Closing Conference. The whole process can take a few hours or a few

weeks. It all depends on the number of hazards, the size of the workplace, the skill and ability of the compliance officer, the previous health and safety track record of the employer, etc.

The Opening Conference

Upon arrival to the worksite, the compliance officer will meet with management and employee representatives and briefly explain the purpose of the inspection. The inspection should cover the hazards identified in you complaint. If your representative or your employer object to a joint opening conference, the compliance officer will conduct separate opening conferences.

At the conclusion of the opening conference, the compliance officer will review the employer OSHA 300 Logs. After checking the employer’s safety record, the compliance officer will begin the inspection accompanied by management and employee representatives.

The Walk Around

After the compliance officer has completed the opening conference and reviewed the employer’s safety records, he/she may decide to check for other hazards or expand the inspection to cover the entire workplace The check list below includes thing you will want to keep in mind during the inspection.

Walk Around Checklist	
	Make sure the compliance offer talks to affected workers.
	Inform co-workers that the inspection is in progress and that they have a right to talk privately and confidentially to the compliance officer.
	Encourage co-workers to point out hazards and to describe past accidents, illnesses and worker complaints.
	Make sure that conditions are typical during the inspection. (If management shut down equipment, open windows, or changes conditions do not hesitate to tell the compliance officer)
	If the hazards explained in the complaint are not observe by the compliance officer, explain how employees were or could be exposed.
	If the compliance officer brings equipment to measure noise, dust, fumes, or other hazards, watch and test. And if you do not understand what the compliance officer is doing, ask.
	Request summaries of the sampling results. (OSHA must provide them)
	Take notes.

A Note on Advanced Notice

OSHA rarely gives employers advance notice of an inspection. However, there are four conditions that may result in the agency giving the employer and worker representative prior notice of an inspection:

In cases of imminent danger, OSHA will try to get management to fix the problem immediately.

When the inspection must be conducted after regular hours or when special preparation is necessary.

If management and worker representative are not likely to be on-site.

If other circumstances indicate that a more complete inspection will result

The Closing Conference

At the conclusion of the walk around the compliance officer is required to conduct a closing conference, jointly or separate with the employer and employee representatives.

If the employer wants a separate conference, the compliance officer will hold the employee conference first to allow for more employee input.

During the closing conference, the compliance officer will review “apparent violations” and way to correct hazards, deadlines, and possible fines.

The compliance officer will advise the employee representative of the following:

The employer must not discriminate against employees for health and safety activity.

If the employer contests and OSHA citation, the employees have a right to elect “party status” before the Occupational Safety and Health Review Commission (an independent agency).

The employee representative must be notified by the employer if the employer files a notice of contest or a petition for modification of an abatement date.

The employee representative has a right to contest the time OSHA allows the employer for correcting a hazard. (Employees, unlike employers, cannot contest other aspects of the citation before the Review Commission). A contest must be in writing and must be filed within 15 working days after receipt of the citation.

Source: *OSHA Field Operations Manual* (FOM), CPL 02-00-148, November 2009.

Summary

1. OSHA's job is to develop mandatory job safety and health standards and enforce them through workplace inspections, employer assistance, and by imposing citations and financial penalties.
2. OSHA covers all private sector employers and employees.
3. All employers covered under the OSH Act must meet their general duty responsibility to provide a workplace free from recognized hazards. This is known as the OSHA *General Duty Clause*.
4. Under OSH Act employers can seek free advice and off-site consultation; request and receive proper identification from OSHA compliance officers and be advised by the compliance officer of the reason for an inspection; have an opening and closing conference with the compliance officer; accompany the compliance officer on the inspection; and file a Notice of Contest to dispute inspection results and request an informal settlement agreement process after an inspection.
5. Workers must follow all application standards, rules, regulation and order issued under OSA Act. However, **OSHA cannot cite workers for violation.**
6. Under the OSH Act workers can request that the OSHA Area Director investigate hazardous condition or violations of standards in the workplace; have names of employees filing complaints withheld from employers; be advised of OSHA actions regarding complaints; have authorized employees representatives accompany the OSHA compliance officer; observe any monitoring or measuring of hazardous materials and see any related monitoring or measuring of hazardous materials and see an related monitoring or medical records; review the OSHA-300 Logs at a reasonable time and in a reasonable manner; and request a closing discussion following an inspection.
7. Because its staff and resources are limited, OSAH spends nearly all of its time on the most hazardous workplaces. If your complaint falls into the category of "imminent danger," OSHA will respond quickly. However, for most of us, it is likely that our complaints will generally be classified by OSHA as something "other than serious."
8. Do not exercise OSHA's "right to refuse" unsafe work unless you have no alternatives and you know and fear that doing the work could result in death or serious injury. How and when you use OSHA will ultimately depend on circumstances that are specific to your workplace.

10. For OSHA to inspect your workplace, you must file an OSHA-7 Complaint Form and fax or mail it to your local OSHA Regional Office. The most important question on the form is titled “Hazard Description/Location.” Your answer should clearly describe each hazard listed and be numbered and organized by type and location. Most on-line complaints are handled by OSHA using the phone/fax investigation procedures.
11. An OSHA phone/fax investigation could work to your advantage if the hazard doesn’t involve “imminent danger” and is not covered by an OSHA standard. A call and follow-up letter from the agency might shake the employer up enough and get them moving in the right direction.
12. For serious violations, or situations where the employer has failed to act on an OSHA investigation, the inspections should occur within 30 days. There are three parts to an OSHA on-site inspection including an Opening Conference, Walk Around, and Closing Conference. The whole process could take a few hours or a few weeks.

Evaluation – OSHA Rights and Responsibilities

1. How important is this activity for workers at your workplace?
Please circle one number.

Activity Is Not Important			Activity Is Very Important	
1	2	3	4	5

2. Please put and “X” by the one factsheet you feel is the most important.

	1. What Is OSHA and Who Is Covered		7. How OSHA Prioritizes Complaints
	2. Employer Responsibilities Under OSHA		8. Filing an OSHA-7 Complaint
	3. Employer Rights Under OSHA		9. OSHA -7 Complaint Checklist
	4. Worker Responsibilities Under OSHA		10. OSHA-7 Complaint Form
	5. Worker Rights Under OSHA		11. The On-line Complaint Form
	6. Workers Have Limited Rights to Refuse Unsafe Work		12. OSHA Investigation

3. Which summary point do you feel is most important?
Please circle one number.

1.	2.	3.	4.	5.	6.
7.	8.	9.	10.	11.	12.

4. What would you suggest be done to improve this Activity?

Hazard Mapping - Workplace

Purpose

To begin the process of analyzing areas in your workplace where the risks of accidents and injuries are greatest.

This activity has one task.

Task

In your groups choose a scribe and review the factsheets on following pages. The factsheets will help you learn about hazards mapping and how it can be used to help you identify the areas in your workplace where the risks of accidents and injuries are greatest.

Then based on your own experiences and the factsheets use the sheet of paper and markers and follow steps 1-5 on the next page to help you create your hazard map. Write large and use the entire sheet of paper for your map. Use the factsheets to help you label and describe the specific hazard areas.

Step 1:

Make a drawing on the sheet of paper that shows the basic layout of your workplace. (See Factsheet 6 for an example of what a hazard map looks like)

Step 2:

Identify the hazards in each area of the facility using a color-coded circle on the map. (See Factsheets 3-4)

Step 3:

Rate each hazard on a scale of 1 to 4 (See Factsheets 3-4)

Step 4:

Label each hazard with a name or brief description. (See Factsheets 5-6)

Step 5:

Based on your map make a list of the hazards that concern you the most and be ready to tell us why these hazards are a concern for your group.

1. Use Hazard Mapping to Identify Problems

A Hazard Map is a visual representation of the workplace that identifies where there are hazards that could cause injuries. For example, a hazard map might look at the following:

- Physical hazard
- Frequency of exposures
- Level of exposures
- A specific chemical
- Specific workers or job classifications most likely to be exposed

Hazard Maps and Worker Experiences

Hazard mapping draws on what workers know from on-the-job experience. The hazard mapping approach works best when conducted by a small group of workers from the same department of work area.

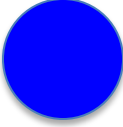
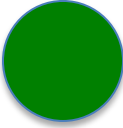
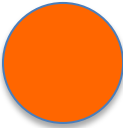
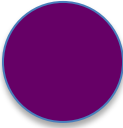

2. Why Hazard Map?

Hazard mapping can help you identify occupational safety and health hazards. If your workplace has other ways or approaches for identifying hazards, they can be included in your hazard map.

The point of hazards mapping is to gather the knowledge about hazards from your co-workers so you can work together to eliminate and/or reduce the risks of accidents and injuries.






Hazard mapping respects the vast array of skill, experience and knowledge that workers have about their jobs. Hazard mapping requires working together to identify , prioritize and solve problems.

3. Labeling

Hazard Code Key		
	Blue	Electrical Hazard
	Green	Chemical Hazard
	Orange	Physical Hazards (heath, noise, air quality, slippery floors, poor lighting, poorly designed work stations, etc)
	Purple	Flammable/Explosive Hazards
	Black	Other Hazards (specify)

Level of Hazard	
1	Low Hazard
2	Medium Hazard
3	High Hazard
4	Very High Hazard

4. Examples of Hazards Mapping Labels

Hazard Codes and Levels of Hazards		
	Blue	Electrical – Medium Hazard
	Green	Chemical - High Hazard
	Orange	Physical – Medium Hazard
	Purple	Flammable/Explosive – Very High Hazard
	Black	Other – Low Hazard

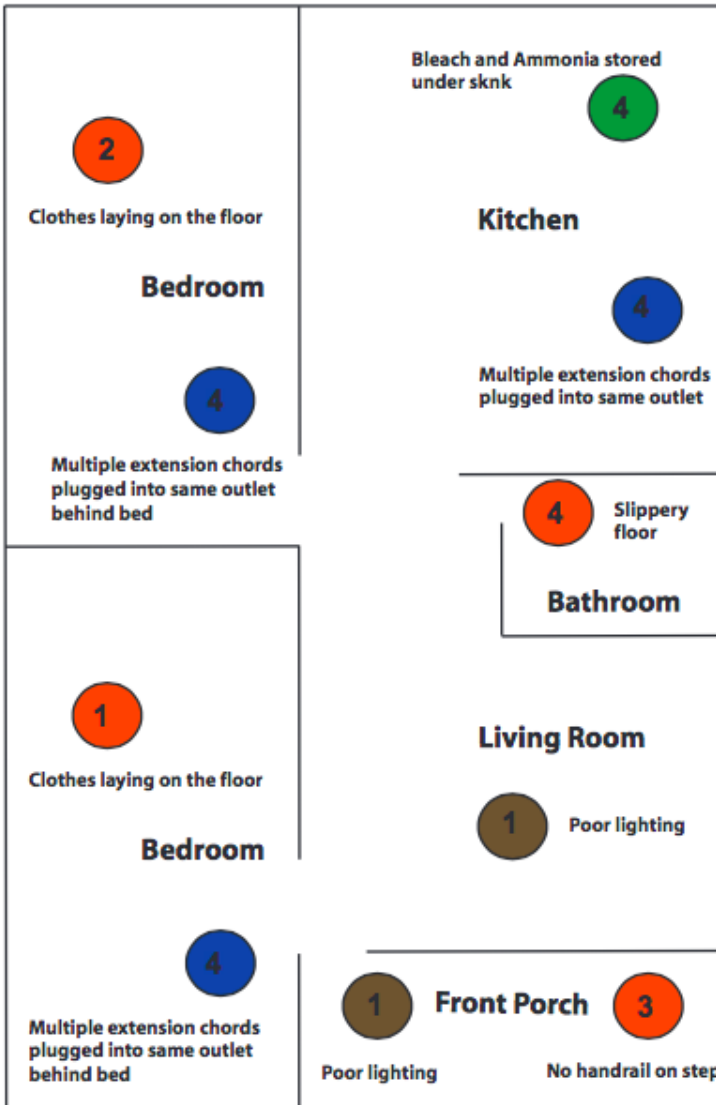
5. Identifying Areas of Concern

Before you begin developing your map, think about where the hazards may exist in your workplace.

Potential Workplace Hazards	
	Repetitive use of knives and scissors on the processing line.
	Chemical use to clean the chicken passing through the line.
	Slippery floors
	Loud noises
	Extremely cold temperatures
	Picking-up heavy loads

6. Example of a Home Hazard Map

-  Electrical Hazard
-  Chemical Hazard
-  Physical Hazard
-  Ergonomic Hazard
-  Other Hazard



Summary:

1. A Hazard Map is a visual representation of the workplace where there are hazards that could cause injuries.
2. Hazards mapping can help you identify occupational safety and health hazards.
3. The point of hazard mapping is to gather the knowledge about hazards from your co-workers so you can work together to eliminate and/or reduce the risks of accidents and injuries.

Evaluation – Hazard Mapping Workplace

1. How important is this activity for workers at your workplace?
Please circle one number.

Activity Is Not Important			Activity Is Very Important	
1	2	3	4	5

2. Please **put and “X”** by the one factsheet you feel is the most important.

	1. Using Hazard Mapping to Identify Problems		4. Examples of Hazard Mapping Labels
	2. Why Hazards Map?		5. Identifying Areas of Concern
	3. Labeling		6. Example of a Home Hazard Map

3. Which summary point do you feel is most important?
Please circle one number.

1.	2.	3.
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4. What would you suggest be done to improve this Activity?

Hazard Mapping - Body

Purpose

To begin the process of analyzing the injuries, illnesses, and stresses that you have suffered on the job and to identify which illnesses, injuries, and stresses workers have in common.

This activity has one task.

Task

In your groups choose a scribe and review the factsheets on the following pages. The factsheets will help you learn about body mapping and how it can be used to help you identify injuries, illnesses, and stresses that you might suffer as a result of your work.

Then based on your own experiences and the factsheets use the sheet of paper and markers and follow steps 1-5 on the next page to help you create your body map. Write large and use the entire sheet of paper for your map. Use the factsheets to help you label and describe the specific areas of your body where you have suffered injuries, illnesses, and stresses.

Step 1:

Using the large sheet of paper with and draw an outline of a body (front and back) like the one in Factsheet 5

Step 2:

Identify the injuries, illnesses, and stresses that you have suffered as a result of your work hazards using a color-coded circle on the map. (See Factsheets 3-4)

Step 3:

Label each hazard with a name or brief description. (See Factsheets 5-6 on pages ???)

Step 4:

Based on your map make a list of the injuries, illnesses, and stresses that concern you the most and be ready to tell us why these are a concern for your group.

1. Using Body Mapping to Identify Injuries, Illnesses, and Stresses

A Body Map is a picture that shows what parts of your body are getting hurt, sick or stressed by your job. A body map also helps to identify illnesses, injuries, and stresses that workers have in common. For example, a body map might look at the following:

2. Body Mapping and Worker Experiences

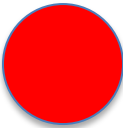
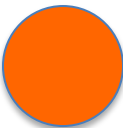
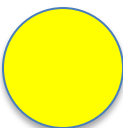
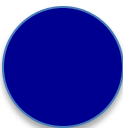
Body mapping draws on what workers know from on-the-job experience. The body mapping approach works best when conducted by a small group of workers from the same department of work area. The body map will show a picture of the injuries, illnesses and stresses of workers on that job or in that department.

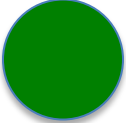


3. Why Body Map?

Body mapping can help you identify illnesses, injuries, and stresses that you suffer on the job.

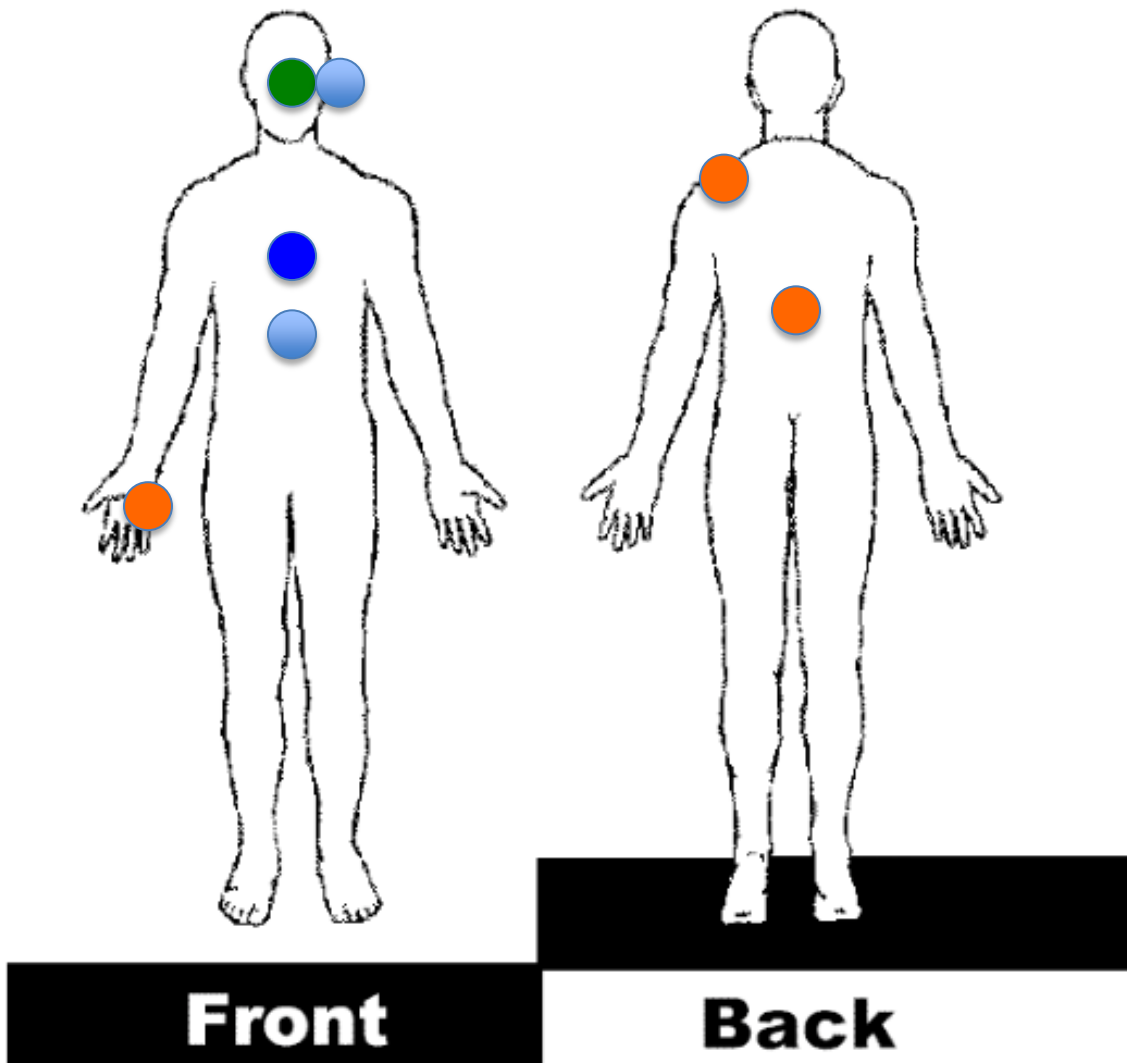
Each injury, illness, and stress identified during the body mapping process is caused by a hazard or problem in the workplace that needs to be fixed.

4. Labeling

Hazard Code Key		
	Red	Use this color if you have had contact with blood of another person or with any other bodily fluid of another person
	Orange	Use this color if you have injured your back or another part of the body from repetitive motions in your work.
	Yellow	If you have had stress or become sick from stress.
	Dark blue	Use this color if you have suffered from a physical or emotional injury from violence in your workplace.

	Green	Use this color if you have had contact with dangerous chemicals or have become sick from them.
	Light blue	Use this color for all other health problems , such as skin allergies, asthma, or loss of sight.
	Light green	Use this color for all other injuries , such as bruising, broken bones, electric shocks, .

5. Example of a Body Map



Summary:

1. A Body Map is a picture that shows what parts of your body are getting hurt, sick or stressed by your job.
2. The body mapping approach works best when conducted by a small group of workers from the same department of work area.
3. Each injury, illness, and stress identified during the body mapping process is caused by a hazard or problem in the workplace that needs to be fixed.

Evaluation – Hazard Mapping Body

1. How important is this activity for workers at your workplace?
Please circle one number.

Activity Is Not Important			Activity Is Very Important	
1	2	3	4	5

2. Please **put and “X”** by the one factsheet you feel is the most important.

1. Using Body Mapping to Identify Injuries, Illnesses, and Stresses	3. Labeling
2. Body Mapping and Worker Experiences	5. Examples of a Body Map
3. Why Body Map?	

3. Which summary point do you feel is most important?
Please circle one number.

1.	2.	3.
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4. What would you suggest be done to improve this Activity?

Introduction to Ergonomics

Purpose

To learn about the signs, symptoms, workplace-specific conditions and risk factors that are linked to musculoskeletal disorders (MSDs) and what we can do to reduce the risks of getting injured.

This Activity has two tasks.

1. What is Ergonomics?

“Ergonomics is the science of fitting workplace conditions and job demands to the capabilities of the working population.”

As poultry workers, we are required to “fit the job.” We are asked to stand in one place all day long, use awkward postures, and do repetitive tasks. These job demands and other workplace factors can cause discomfort, fatigue, pains and aches in different parts of the body such as the back, neck, shoulders, forearms, elbows, hands and wrist.

Using ergonomic principles, properly designed jobs, tasks, equipment and tools as well as good job organization can help to fit the job to the workers.

- Ergonomics includes:
- Designing equipment that is easy to use
- Investing new equipment that will take the strain out of the job
- Organizing work in different ways
- Changing how tasks are done

2. What are CTDs, RSIs, and MSDs?

What are Cumulative Trauma Disorders?

Cumulative trauma disorders (CTDs) are disorders of the muscles, tendons, or nerves. CTDs are caused by repeated stress or exposure to forceful exertions, repetitive motions, awkward body postures, nerve compression and vibration. CTDs typically affect the arms, shoulders, hands or wrists.

What are Repetitive Strain Injuries (RSIs)?

Repetitive strain injuries (RSIs) is a general term like (CTD) used to describe a range of symptoms associated with repetitive motion work.

What are Musculoskeletal Disorders (MSDs)?

Musculoskeletal disorders (MSDs) are disorders of the muscles, nerves, tendons, ligaments, joints, cartilage, or spinal disks. Examples of jobs likely to cause MSDs are those requiring:

- Forceful or prolonged exertions of the hands
- Heavy lifting

- Pushing, pulling or carrying of heavy objects
- Prolonged awkward postures

CTDs, RSIs, and MSDs are often used to mean the same thing.

Source: National Institute for Occupational Safety and Health (NIOSH) and United Auto Workers, *Ergonomics Awareness Manual*.

3. The Three Stages of MSD Symptoms

MSD symptoms can range from mild aches to disabling pain. Symptoms often appear gradually and become more severe over time. Generally symptoms progress through three stages.

Stage 1

Symptoms may appear during periods of activity and may disappear during periods of rest. Symptoms are relatively mild. Early symptoms of MSDs often are mistaken for muscle fatigue.

Stage 2

Symptoms are most persistent. They do not disappear completely during periods of rest. Increasingly severe symptoms may interfere with performance of usual work activities.

Stage 3

Symptoms are constant. Sleep is often disturbed. Severe pain, limited mobility, loss of sensation or muscle weakness makes it impossible to perform most job tasks.

Symptoms of MSDs
Soreness
Burning sensation
Numbness
Weakness
Tenderness
Swelling
Tingling
Aching
Stiffness
Skin Discoloration (blanched or white) – skin discoloration of the fingers is an indication of Hand-Arm Vibrations Syndrome (HAVS) and it is the result of long-term exposure to vibration.

4. MSD Risk Factors

Many jobs that poultry workers do are associated with ergonomic risk factors that include:

- Repetition – performing the same motion or series of motions continually or frequently.
- Forceful exertion – the amount of physical effort to perform a demanding task or to maintain control of equipment or tools
- Awkward and static postures – assuming positions that place stress on the body, such as reaching above shoulder height, kneeling, squatting, leaning over a worktable, twisting, the torso while lifting, maintaining a sustained posture for a long period of time, as well as holding or using tools in a non-neutral or fixed position.
- Vibration – using vibrating hand-held power tools can increase the stress on the hands and arms.
- Cold temperatures

MSD Risk Factors	
Job/Working Conditions	MSD Risk Factor
Standing for a long time	Standing for a long time reduces blood flow to the legs, forces isolated muscles to work for an extended time, and increases risk of fatigue and varicose veins.
Use of knives	The cutting motion may entail some bending of the wrist. Factors such as poorly fitting gloves, slick handles, inappropriately sized handles, or dull knives increase the force that must be used. Finger force and bending of the wrist are recognized risk factors for the development of many hand injuries.
Use of scissors	Use of traditional scissors forces the fingers to repeatedly open and close the blade, which can stress tendons, increasing the risk of tenosynovitis and carpal tunnel. Contact trauma to sides of fingers can damage nerves, which can cause numbness and tingling in the tips of the fingers and thumb.
Reaching	Employees repeatedly reach to the bird on the cone to perform cutting tasks and may need to reach to a bin or a tub to deposit removed item. Repetitive reaching stresses the shoulder and upper back.
Reaching up, forward or to the side to access the shackles	Employees may bend to lift chickens from the supply conveyor and then reach out and away, sometimes above shoulder height, to place them on multi-cut machines or

	shackle conveyors. Injuries to the shoulder, back, and neck are common due to awkward postures and high repetition. Employees at the beginning of the line often work faster than those near the end of the line because there is always a full supply of birds and all positions are open.
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Task 2

Maria understand why poultry workers should be concerned about MSDs. But since cutting, pulling, reaching, and using scissors, are what poultry workers often do in order to get paid, she doesn't think that there is much she can do to reduce the risks, especially when it comes to her aching hands and wrists.

In your groups, review the factsheets on pages ???? and then working together, make a list of things poultry workers can do to reduce the risks of hurting their hands and wrists on the job.

What can poultry workers do to reduce the risks of back injuries on the job?

1.

2.

3.

4.

5.

6.

5. Techniques for the Use of knives

- Keep knives sharp and in good condition.
- Remove damaged knives from service.
- Use [knives](#) MODAL LINK appropriate for the task.
- Provide properly sized gloves.
- Tilt work surfaces towards employees to reduce wrist deviation.
- Divide the task into specific units and provide an appropriate cutting tool so the task can be performed with a neutral wrist and body posture.

6. Techniques for the use of scissors

- Provide pneumatic scissors; these scissors can be activated by employees with little finger force and with the wrist in a neutral posture. A cut proof glove should be used on non-cutting hand.
- Provide spring activated scissors; these scissors open automatically after each cutting motion.
- Rotate to those tasks that do not require scissor use.

7. Techniques for standing for a long time

- Use sit/stand stools, which allow employees to lean and have their weight supported while still remaining in an upright posture.
- Rotate to tasks that do not require prolonged standing.
- Use shoe insoles that cushion the feet and spread foot pressure over a larger

surface.

- Use a footrest in front of employees so they can lift one foot, allowing them to continually shift their posture.

8. Techniques for reaching

- Use diverter bars to push the product closer to the employee.
- Reduce width of supply conveyor so the product is presented closer to the employee.
- Position cones and other work fixtures so all activities of the task can be performed with the elbows in close to the torso.
- Use height-adjustable stands, where appropriate, to place employee in proper orientation to the work surface.

9. Techniques for reaching up, forward or to the side to access the shackle

- Minimize forward reaches by moving the shackle conveyor towards the worker.
- Minimize vertical distance between the shackles and the belt conveyor to minimize bending and elevated reaches.
- Rotate up and down hanging line.
- Install height-adjustable stands so employees can properly position themselves.

Summary

1. “Ergonomics is the science of fitting workplace conditions and job demands to the capabilities of the working population.” Poultry workers are asked to stand in one place for long periods of time, use awkward postures, and do repetitive tasks. This can lead to sprained muscles, inflamed tendons, and damaged nerves. Using ergonomic principles, jobs, equipment, work organization and environments can be designed to fit workers.
2. Repetitive strain injuries (RSIs), musculoskeletal disorders (MSDs), and cumulative trauma disorders (CTDs) are general terms referring to injuries of the muscles, joints, tendons, nerves or other tissues caused by repetitive motions, forceful exertions, vibrations, or awkward body positioning.

3. RSI symptoms can range from mild aches to disabling pain. Symptoms generally progress through three stages, becoming more and more severe. Early reporting of symptoms is critical for proper medical treatment.
4. Overexertion is the cause of 45% of all musculoskeletal disorders.
5. MSDs that result from repetitive motion or overexertion from poultry work can result in injuries and extended periods of time away from work.
6. Using proper techniques for using knives, scissors, reaching, and standing for long periods of time can reduce the risks of MSDs.

Evaluation – Ergonomics

1. How important is this activity for workers at your workplace?
Please circle one number.

Activity Is Not Important			Activity Is Very Important	
1	2	3	4	5

2. Please put and “X” by the one factsheet you feel is the most important.

1. What is Ergonomics?	6. Techniques for the use of scissors
2. What are CTDs, RSIs, and MSDs?	7. Techniques for standing for a long time
3. The Three Stages of MSD Symptoms	8. Techniques for reaching
4. MSD Risk Factors	9. Techniques for reaching up, forward or to the side to access the shackle
5. Techniques for the use of knives	

3. Which summary point do you feel is most important?
Please circle one number.

1.	2.	3.	4.	5.	6.
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4. What would you suggest be done to improve this Activity?

PERSONAL PROTECTIVE EQUIPMENT

Purpose

To evaluate the importance, use and limits of personal protective equipment (PPE) in preventing injuries and exposures on the job.

This Activity has one task.

Task 1

In your groups, review the factsheets on the following pages. Then working together based on the factsheets and your own experience complete the PPE Hazard Worksheet below. After you have completed the worksheet, answer the questions on the next page.

PPE Hazard Worksheet			
Hazards	What types of PPE could be used to protect you from these hazards?	Are these hazards a problem or concern for you on your job?	
		Yes	No
Flying particles such as dust or powders; chemical gases or vapors, or a combination of these.	Eye protection		
Molten metal, liquid chemicals, acids or caustic liquids that could splash.	Eye, Hand and CPC		
Falling objects from above; the possibility of accidental head contact with electrical hazards; exposed pipes or beams that you could bump with your head.	Head protection		
Handling, moving, mixing or applying hazardous chemicals to surfaces and equipment.	Eye, Hand, Foot & Leg		
Noise that is so loud that you have difficulty hearing normal speech in the work area and/or you have to shout to make yourself heard more than arm's length away.	Hearing protection		
Heavy equipment; heavy falling or rolling objects; sharp objects such as nails or spikes on walking surfaces, exposure to hot substances, slippery surfaces, corrosive or poisonous materials, or exposure to electrical hazards.	Foot and Leg Protection		

- 1. For each hazard your group checked “YES” on the worksheet, please explain the problem and or the source of your concern. (No right or wrong answers)**

- 2. In your opinion could any of the hazards be eliminated through higher-level controls such as engineering or chemical substitution? (See Factsheet 1 for more information)**
 - a. If so, what could be done to reduce or eliminate the hazard(s)?**

- 3. Do members of your group wear protective clothing, gloves, and or/glasses?**
 - a. If so, do the gloves, clothing or glasses provide the right amount of protections? (See Factsheets 2 through 6)**

 - b. Are you using gloves that are made for the chemicals you work with?**

 - c. Does your eye protection fit properly?**

 - d. Can you see clearly when you are wearing your eye protection?**

4. **How old are the gloves and or/protective clothing that you are using currently at work? How will you know when it is time to replace them? (See Factsheet 6 for more information)**

1. PPE and the Hierarchy of Controls

OSHA requires employers to eliminate, substitute or use engineering controls to reduce hazardous conditions on the job. Employers must apply these *higher-level controls* before resorting to the use of *lower level controls* such as warnings, training and procedures and the use of personal protective equipment (PPE). It is important to recognize that **PPE is the least effective way to control a hazard.**

Hierarchy of Controls
1. Elimination
2. Substitution
3. Engineering (guardrails, ventilation, etc.)
4. Administrative (signage, staffing, etc.)
5. Training and Procedures
6. Personal Protective Equipment (PPE)

Applying the *Hierarchy of Controls* is the most effective way to deal with workplace hazards. The lower level of control – warnings, training/procedures, and PPE – are acceptable only when the higher level of control – elimination, substitution or engineering – are not feasible or do not adequately reduce risk.

OSHA and the Hierarchy of Controls

OSHA recognizes the hierarchy of controls as engineering controls first, followed by administrative controls. Hazards may be controlled through engineering and or/administrative controls. These controls can eliminate or reduce hazards. When engineering controls or administrative controls or a combination of engineering and administrative controls do not completely eliminate the hazards, PPE may be used. Knowing the correct PPE to use is essential.

Selecting the Right PPE

OSHA strongly recommends that employers conduct a comprehensive *hazard assessment* prior to determining PPE needed. For each work site, a certificate must be completed that lists the findings of the inspections and the specific protective equipment needed.

In order to select the appropriate PPE employers should:

- Conduct an exposure assessment to determine the type and amount of hazardous exposure.
- Take into account the factors affecting PPE selection
- Understand the assigned protection factors
- Know the kinds of PPE and their characteristics

Factors Affecting PPE Selection
Physical configuration of the job site <i>(Will PPE be used in tightly constrained areas with machinery that could snag hoses?)</i>
Medical condition of the person wearing the PPE
Correct fit and comfort of PPE
Resistance to physical stress <i>(Will PPE be used in an area where abrasions, cuts, puncture or tears may occur?)</i>

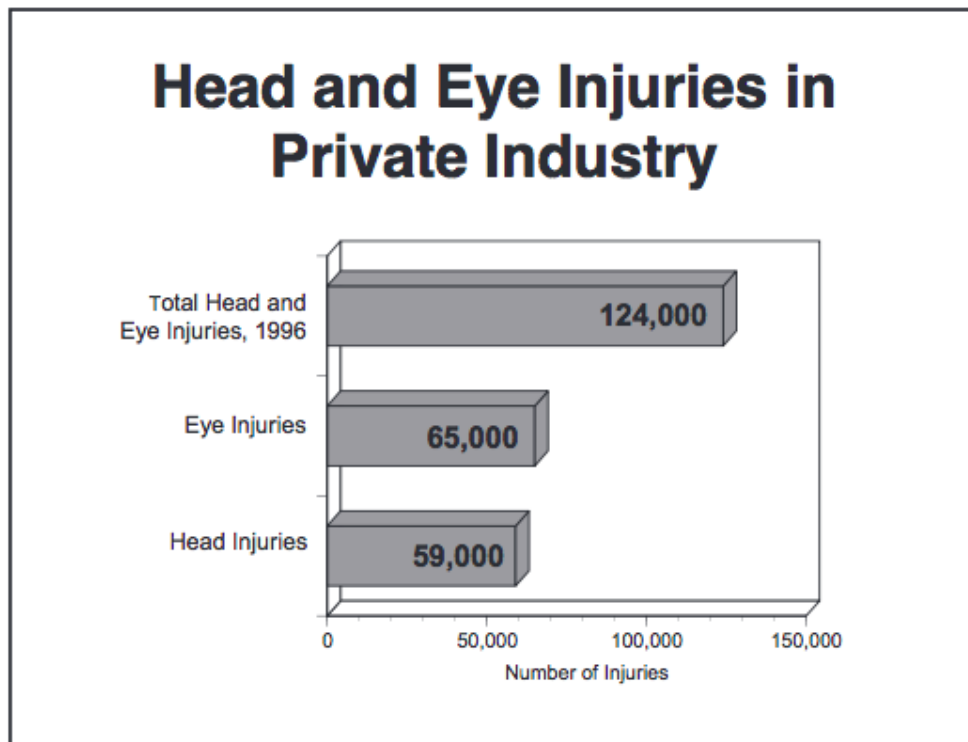
Sources: OSHA Regulations (Standards 29 CFR), PPE 1910.132 and *Non-Mandatory Compliance Guidelines for Hazards Assessment and PPE Selection*, 1910 Subpart I App B. Center for Disease control, 1998.

2. Eye Protection

Eye protection (including safety glasses, goggles, or full face shields) must be provided where there is a potential for injury to the eyes or face from flying particles, molten metal, liquids chemicals, acids or caustic liquids, chemical gasses or vapor, or a combination of these. Protective eye equipment should:

- Provide adequate protection against the particular hazard
- Be comfortable to wear under the existing work conditions
- Fit snugly without interfering with a person's movement or vision
- Be durable
- Be capable of being disinfected
- Be kept clear and in good repair

For eye protection, it is important that the protective equipment properly fit the person without interfering with their ability to move or see.



Source: Occupational Safety and Health Administration, *Personal Protective Equipment*, Washington DC, 1998

3. Hand Protection

There are many types of gloves available to protect against a wide variety of hazards. It is extremely important that you use gloves that are designed for the hazards and tasks of the job you are doing. Gloves made for protection against one hazard may not protect against another hazard even though they may appear to be protecting your hands.

In general, gloves fall into four groups:

Leather, canvas or metal mesh provide protection from cuts, burns, or heat.

Fabric and coated fabric gloves provide protection from dirt and abrasions.

Chemical and liquid-resistant gloves provide protection from burns, irritation and dermatitis.

Insulating rubber gloves provide protection from cuts, lacerations, and abrasions.

Factors That Determine Glove Selection	
	Type of chemicals handled
	Nature of contact (total immersion, splash, etc.)
	Duration of contact
	Area requiring protection (hand only, forearm, arm)
	Grip requirements (dry, wet, oily)
	Thermal protection
	Size and comfort
	Abrasion/resistance requirements

Sources: OSHA Publication 3151-12R, Personal Protective Equipment, 2003

4. Hearing Protection

Overexposure to noise can lead to permanent hearing loss. If you are experiencing any of the symptoms listed below then you may be overexposed to noise.

- Difficulty hearing normal speech in the work area
- Shouting to make oneself heard more than an arm's length away
- Ringing in the ears after leaving the work area
- After work, dulled or muffled hearing that disappears after 14 hours (It's hard to hear normal conversation, TV, radio, etc.)
- Headaches, dizziness or other health conditions related to stress (for example: high blood pressure, fatigue, etc.)
- Co-workers who are hard of hearing

Decibels and Exposure Limits

Decibels (dB) measure the loudness of noise. **When decibels go up by 3, loudness doubles.** For example, 93 dB is twice as loud as 90 dB.

In general, the louder the noise, the shorter the amount of time you can be exposed before hearing protection is required. For example, you can be exposed to a noise level of 90dB for eight hours per day before hearing protection is required. But if the noise level reaches 115 dB hearing protection is required if the exposure exceeds 15 minutes.

NOISE SOURCE	DECIBEL LEVELS
Decibel Levels 30-80	
Whisper	30dB
Normal Conversation	60dB
Vacuum Cleaner	75dB
Ringing Telephone	80dB
Decibel Levels 85-120 (Diminished mental ability at 80dB)	
City Traffic	85dB

Hair Dryer, Power Lawn Mower	90dB
Chain Saw	110dB
Personal Cassette Player on High	112dB
Football Game in Stadium	117dB
Decibel Levels 120 and Over (The point at which pain begins)	
Ambulance Siren	120dB
Noisy Squeak Toys	135dB
Firecracker, Jet Engine Take Off	140dB
Gunshot	165dB
Rocket Launch	180dB

Types of Hearing Protection

The basic types of hearing protection include:

Single-use earplugs made of waxed cotton, foam, silicone rubber or fiberglass wool. They are self-forming and, when properly inserted, they work as well as most molded earplugs.

Pre-formed or molded earplugs must be individually fitted by a professional and can be disposable or reusable. Disposables should be used only once and then discarded. Reusable plugs should be cleaned after each use.

Earmuffs require a perfect seal around the ear. Glasses, facial hair, long hair or facial movements such as chewing may reduce the protective value of earmuffs.

Permissible Noise Exposures	
Duration Per Day in Hours	Sound Level in dB
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
.5 (30 minutes)	110
.25 (15 minutes)	115

Ear Plugs Not Always Effective

A National Institute for Occupational Safety and Health (NIOSH) study shows that as actually worn in a facility, earplugs **are less than half as effective** in protecting workers' hearing as their manufacturers claim. In 15 different facilities, 420 workers had their hearing tested while wearing one or four types of earplugs. The results were compared with the earplug manufacturers' claims. None of the plugs provided the claimed percentage of effectiveness.

Ear Muffs May Provide Even Less Protection

Earmuff manufacturers also dangerously overstate the effectiveness of their product. In fact, earmuffs may provide even less protection than earplugs. A study of shipyard works showed there was greater hearing impairment among the workers who had used earmuffs than those who had used plugs. A study concluded that plastic plugs were more comfortable to wear than earmuffs, and therefore provided the best protection for long-term use.

Sources: NIOSH, *A Practical Guide to Preventing Hearing Loss*, 96-100, Appendix B, "Hearing Protection Devices," July, 1999
OSHA Publication 3151-12R, Personal Protective Equipment, 2003.

5. Foot/Leg Protection

If you face possible foot or leg injuries from falling or rolling objects, crushing or penetrating materials, exposure to hot substances, corrosive or poisonous materials, or exposure to electrical hazards then you will need and leg protection.

When to Wear Foot or Leg Protection	
	When heavy objects might roll onto or fall on the feet.
	Working with sharp objects that could pierce soles or uppers of ordinary shoes.
	Exposure to molten metal that might splash on feet or legs.
	Working on or around hot, wet or slippery surfaces.
	Working when electrical hazards are present.

Foot and leg protection choices include the following:

Leggings protect the lower legs and feet from heat hazards such as molten metal or welding sparks.

Metatarsal guards protect the instep area from impact and compression

Toe guards fit over the toes of regular shoes to protect the toes from impact and compression hazards

Combination foot and shin guards protect the lower legs and feet, and may be used in combination with toe guards when greater protection is needed.

Safety shoes have impact-resistant toes and heat-resistant soles that protect the feet against hot work surfaces common in roofing, paving and hot metal industries. The metal insoles of some safety shoes protect against puncture wounds. Safety shoes may also be designed to be electrically conductive to prevent the buildup of static electricity in areas with the potential for explosive atmospheres or nonconductive to protect workers from workplace electrical hazards.

Source: OSHA Publication 3151-12R, Personal Protective Equipment, 2003.

6. Head Protection

Serious head injuries can kill or impair you for life. Wearing a properly fitted safety helmet or hard hat is one of the easiest ways to protect your head from injury. Hard hats

can protect you from impact and penetration hazards as well as from electrical shock and burns.

If you are working on a job where objects might fall from above or there is a possibility of accidental head contact with electrical hazards, or you could bump your head against fixed objects (e.g. exposed pipes or beams) then you should be wearing a hard hat. Whenever you are working below others who are using tools or working under a conveyor belt, you should be wearing a hard hat.

Types of Hard Hats (The information should be listed on the hat)

Class A:

- General service (building construction, shipbuilding, lumbering)
- Good impact protection but limited voltage protection

Class B:

- Electrical/Utility work
- Protects against falling objects and high-voltage shock and burns

Class C:

- Designed for comfort, offers limited protection
- Protects against bumps from fixed objects, but does not protect against objects or electrical shock

7. Cleaning and Maintenance of PPE

Here are some guidelines for the cleaning and maintenance of PPE:

- All protective equipment should be maintained in good condition and replaced when no longer suitable for its purpose.
- PPE should not be used longer than the time indicated by the manufacturer.
- PPE should be cleaned, disinfected and thoroughly examined before it is used again.
- A record should be kept of the condition, cleaning, disinfection, and examination of PPE

Summary

1. Using the *hierarchy of controls* employers must eliminate, substitute or use engineering controls to reduce hazardous condition on the job. PPE is the least effective control in the hierarchy of controls.
2. OSHA strongly recommends that employers conduct a comprehensive *hazard assessment* prior to determine the PPE needed.
3. Eye protection must be provided where there is a potential for injury to the eyes or fact from flying particles, molten metal, liquid chemicals, acids or caustic liquid, chemical gasses or vapors, or a combination of these.
4. When hand protection is required it is extremely important that you use gloves that are designed for the hazards and tasks that you are doing.
5. Overexposure to noise can lead to permanent hearing loss. There are three basic types of hearing protection: single-use earplugs, pre-formed or molded earplugs, and earmuffs.
6. If you face possible foot or leg injuries from falling or rolling objects, crushing or penetrating materials, exposure to hot substances, corrosive or poisonous materials, or exposure to electrical hazards then you will need foot and leg protection.
7. If you are working on a job where object might fall from above, or there is a possibility of accidental head contact with electrical hazards, or you could bump your head against fixed objects (e.g. exposed pipes or beams) then you should be wearing a hard hat.

Evaluation – Personal Protective Equipment

1. How important is this activity for workers at your workplace?
Please circle one number.

Activity Is Not Important			Activity Is Very Important	
1	2	3	4	5

2. Please put and “X” by the one factsheet you feel is the most important.

	1. PPE and the Hierarchy of Controls
	2. Eye Protection
	3. Hand Protection
	4. Hearing Protection
	5. Foot/Leg Protection
	6. Head Protection
	7. Cleaning and Maintenance of PPE

3. Which summary point do you feel is most important?
Please circle one number.

1.	2.	3.	4.	5.	6.	7.
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4. What would you suggest be done to improve this Activity?
