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Safety & Health Bulletin



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S & H BULLETIN 10

OSHA

INTRODUCTION

This bulletin is divided into two parts. Part A will list "compliance actions". We define compliance actions as those things you must do in order to comply with OSHA and save yourself the expense of a fine. Part B will outline "optional actions" you may take to make your life and your job easier and more tranquil.

PART A lists 4 compliance actions:

1. Recordkeeping Requirements
2. Toilet Partitions
3. Women's Retiring Rooms
4. Employee Exposure to Asbestos ✓

PART B presents 3 optional actions:

1. Action you should take when an OSHA inspector visits your plant.
2. Suggestions as to how you can obtain funds to finance your company's compliance with the law.
3. Phone numbers of OSHA officials you can contact in your locality.

***COMING SOON IN S & H BULLETIN 11:

WHAT IT'S LIKE WHEN YOUR ESTABLISHMENT IS SELECTED FOR AN INSPECTION****

ROUTE TO
Department

Finance		
Administration		
Sales		
Technical		
Production		

PART A COMPLIANCE ACTIONS

1. Recordkeeping Requirements. Attached to this bulletin is a copy of the U. S. Department of Labor's publication, "Recordkeeping Requirements under the Williams Steiger Occupational Safety and Health Act of 1970". You may have already received this booklet in the mail eight to ten months ago. We are putting it in your hands again at this time, to be sure that you have a copy. This booklet has a great deal of valuable information which will help you to comply with the act. Read it.

The law says that you must keep 3 records of injuries and illnesses that occur among your employees. The injuries and illnesses that must be recorded are defined in the booklet on the reverse side of form OSHA No. 100. It is a log in which you record injuries or illnesses in the order in which they occur during the year.

The second record you must keep is titled, "Supplementary Record of Occupational Illnesses and Injuries" OSHA form No. 101. This record gives you the details on each injury or illness.

The third record you must keep is OSHA No. 102. You need to prepare this after the end of each year (preferably January) and post it where your employees can read it. This record summarizes your company's experience over the preceding year with occupational injuries and illnesses.

Also included in the booklet is a poster (it's a centerfold). The law says you must display it in a prominent place in your establishment.

Above we have called your attention to the 4 actions you must take as detailed in the Recordkeeping Requirements booklet. If you fail to take these actions and are inspected, you can be fined for your omission. We are advised that the minimum fine for each "omission" is now \$25.00.

2. Toilet Partitions. On page 10593 of your OSHA standards book, the paragraph entitled, "Construction of Toilet Rooms" requires that walls of compartments or partitions between toilets be at least 6 feet high and not less than 1 ft. above the floor.

The Occupational Safety and Health Administration advises us that this requirement is being eased. The Administration is taking action to allow partitions to be less than the heights of room walls if their tops are high enough to assure privacy.

Action Recommended: Hold off on changing your toilet partitions until the revised standard is published.

3. Women's Retiring Rooms. On page 10594 of the OSHA standards book, paragraph (f) sets a standard by which you had to provide a retiring room for women. It required at least one such facility for female employees or suitable equivalent space where fewer than 10 women are employed and no rest room is furnished. The Administration advises us this standard will be deleted after completion of hearings. The Administration has received more comments on this than any other. It agrees that this standard is not directly related to on-the-job safety and health.

Action Recommended: Don't make any change in your women's retiring room facilities, pending publication of the final standard.

4. Employee Exposure to Asbestos. On page 10506 of your OSHA standards book, table G3 for Mineral Dusts has been changed to delete the asbestos standard. This is because a new standard has been published by adding a paragraph 1910.93 (a), Asbestos Dust, to the standards. The new permanent standard was announced June 7, 1972 by the Occupational Safety and Health Administration in the Federal Register. Copy of the new standard is attached.

PART B ADMINISTRATIVE ACTIONS

1. Identification of OSHA Inspectors. The official title of an OSHA inspector is "Compliance Safety and Health Officer". This title means that when he visits your plant he will check your safety and health standards for compliance with the act. For short, we call him the OSHA inspector.

Recently, OSHA inspectors have been issued new identification cards. Should someone visit you unannounced (this is normal procedure under the act) and say that he is there for the purpose of inspecting your plant under OSHA, ask him to produce his or her (there are female inspectors) identification card issued by the Department of Labor. The ID card will have his picture and will show that he is employed by the OSHA of the U.S. Department of Labor.

Inspectors are employed by and report to Area Directors. There are 49 area offices in the U.S. Their phone numbers are listed under item 3 below.

2. Compliance Loans. There has been raised a great hue and cry to the effect that compliance with OSHA will cost many small businesses substantial amounts of money.

The act says any small business that is likely to suffer substantial economic injury without financial assistance when it seeks to come into compliance can be eligible for a loan. See Attachment #2 for a fact sheet telling you how to obtain a compliance loan.

3. Phone Numbers of OSHA Officials You Can Contact in Your Locality. The OSHA standards were published in the Federal Register, May 29, 1971. Copy of this was forwarded to you with our Safety and Health Bulletin No. 9. As you know, the standards were written in technical language. There are many businessmen who cannot afford to employ a safety engineer to interpret these standards.

When you have a question about the meaning of a standard, we suggest you call your local Area Director and ask him for guidance. Many of our members tell us their questions are answered quickly. Some businessmen have expressed fear that a call to the area OSHA office will bring down a premature inspection. We doubt that your call to the area office will work in your disfavor. Rather, our information is that a call to your area office will help you to find much needed answers quickly. If your experience does not agree with this, National Headquarters would appreciate a report from you telling us what happened.