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2006 SMACNA Safety Awards Program – Submittals Due May 30, 2006

The 2006 SMACNA Safety Statistics Evaluation and Awards Program (SSEAP) is in full swing. This annual program is the tool SMACNA uses to obtain valuable information about the safety and health programs of its members, determine winners of the annual safety awards, and provide safety feedback to the membership.

The program also provides information for determination of entries into the Construction User's Roundtable (CURT) Safety Awards Program.

All entries must be received by May 30, 2006.

SMACNA members are encouraged to submit the annual safety survey to ensure the program is a success. All surveys are confidential and can be submitted "on-line" or by fax.

SMACNA members can complete and submit their form on-line at www.smacna.org/members/safetysurvey.

To complete and submit your form on-line, you must be registered for SMACNA's "Members Only" Web site.

Members wishing to submit a fax copy can download the form at the following SMACNA website link (members only):

http://www.smacna.org/members/safetysurvey/2006_Survey_Form.pdf

First place winners in each man-hour category will be presented with their awards at the SMACNA annual convention in Phoenix, AZ.

Second and third place winners, and all participants who report zero lost workdays, will have their awards shipped to them in the Fall.

If you have questions about the SSEAP, please contact Mike McCullion, SMACNA's Director of Safety and Health by telephone at (703) 995-4027 or by e-mail (mmccullion@smacna.org).

New OSHA Hexavalent Chromium Standard

Hexavalent Chromium – OSHA’s Final Standard

On February 28, 2006, the Occupational Safety and Health Administration (OSHA) published court-ordered final rules governing workplace exposures to hexavalent chromium (hex chrome) in General Industry and the Construction Industry. Contractors in “state-program” states (state OSHA programs versus federal OSHA programs) can expect that the states will adopt these or more stringent standards in the near future.

Hex chrome is a chemical by-product generated when welding on stainless steel, and to a lesser extent, galvanized steel and chrome-coated metals. In addition, low levels of hex chrome may be an ingredient of the welding rods and wires used in the welding processes.

OSHA adopted a permissible exposure limit (PEL) of five micrograms of hex chrome per cubic meter of air (5 ug/m³) as an 8-hour time weighted average (8-hr TWA). If air monitoring results indicate hex chrome exposures above the PEL, then provisions such as air monitoring every 3 months, regulated work areas, medical examinations, and respirators may be required.

There are other less strict provisions of the standard that allow for “performance oriented” air monitoring programs using historical air monitoring results, an “action level” of 2.5 ug/m³ where air monitoring is required every 6 months, and an exemption to the entire standard if air monitoring results are below 0.5 ug/m³.

The effective date of the standard is May 30, 2006, yet the main provisions of the standard (i.e., air monitoring, regulated work areas, and respirators) do not take effect until November 27, 2006 for employers with 20 or more employees (May 30, 2007 for employers with 19 or fewer employees). If needed, significant engineering controls to get air monitoring results below the PEL, such as modified ventilation systems, are not required until May 31, 2010.

SMACNA members are encouraged to evaluate their welding processes, identify which processes may generate excessive hex chrome fumes, and implement a compliance plan. Initial air monitoring may be needed and can be done in-house, by an insurance provider, or an outside consultant.

A hexchrome standards summary fact sheet is available on the safety page of the SMACNA website (www.smacna.org/safety). Also, SMACNA members are asked to complete and submit a hexchrome questionnaire, also available at www.smacna.org/safety.

The following is an excerpt from the response letter SMACNA submitted to OSHA in 2004. The entire letter can be found on SMACNA’s website at http://www.smacna.org/members/pdf/safety/OSHA_HexChrome_Comment_Letter.pdf

In general, SMACNA does not feel that an OSHA standard for hexchrome, as it relates to welding, has been adequately justified through scientific exposure studies and economic feasibility assessments. The existing information and data relate to various forms of hexchrome use and applications which are not particular to welding issues. The specific issues relative to hexchrome in welding are much different from the concerns in other affected industries such as the hexchrome “raw materials” found in the electroplating and chrome production industries, or the specific exposures in the painting, printing, and woodworking industries.

For more information on the proposed hexavalent chromium standard, contact Mike McCullion, SMACNA’s director of safety and health, at 703-995-4027, or mmccullion@smacna.org.

SMACNA – OSHA Alliance Update

SMACNA – OSHA National Alliance Update

In the Fall of 2005, the SMACNA–OSHA National Alliance marked its first year of cooperative efforts. The OSHA and SMACNA Alliance focuses on providing the organization's members and others in the sheet metal and air conditioning and the construction contracting industries, including Hispanic workers and small businesses, with information, guidance, and access to training resources that will help protect employees' health and safety. The Alliance will address issues such as motor vehicle safety, fall protection, and personal protective equipment with an emphasis on cuts and eye injuries. Several highlights from the year include:

- SMACNA “advertised” the Alliance through the SMACNews newsletter, during training courses, and at various meetings such as the December 2005 Council of Chapter Representatives meeting.
- SMACNA’s safety and health director, Mike McCullion, participated in a Fall Protection Workshop which included representatives from various construction related organizations, contractors, and associations. During the initial workshop meetings, Mr. McCullion volunteered to be the originating author of a collaborative effort to create Fall Protection Tip Cards for employers and employees. The tip sheets are nearly complete and will be available later in 2006.
- SMACNA developed a vehicle safety tip card specific to the sheet metal / HVAC industry that was reviewed and “approved” by the OSHA Alliance division. The tip cards (one for service vehicles and one for construction vehicles) are available to all SMACNA members at no charge.
- SMACNA agreed to develop a safety tip sheet on heat and cold stress working environments. Similar to the vehicle tip cards, this product will be a collaborative effort through the Alliance. This project was approved and will be completed in 2006.
- Mr. McCullion is serving on a Motor Vehicle Safety Topics Page editorial board. The board is planning to create a Motor Vehicle Safety eTool, similar to the existing ones on the OSHA website.
- There is a webpage on the OSHA – Alliances website dedicated to the SMACNA–OSHA Alliance. SMACNA posted a link to the Alliance on the SMACNA – Safety webpage at <http://www.smacna.org/safety/>.

Fall Protection Tip Sheets

Fall Prevention Safety Tips for Employers

Falls from elevations account for approximately one–third of all deaths in construction. The following tips highlight some of the key issues that employers should consider when planning, implementing, and maintaining their fall prevention programs.

1. Develop a written fall prevention plan.
2. Identify potential fall hazards prior to each project and during daily walk–arounds. Pay attention to hazards associated with routine and non–routine tasks.
3. Eliminate the need for fall protection where possible by rescheduling the task, isolating the task, or changing the task.

4. Ensure that fall protection equipment is appropriate for the task, in good condition, and used properly.
5. Conduct general fall prevention training on a regular basis.
6. Train workers on the specific fall hazards identified and on the required personal protective equipment.
7. Conduct regular inspections of fall protection equipment in accordance with manufacturer's recommendations and OSHA requirements.
8. Emphasize fall hazards unique to the site, such as open floor holes or shafts, riser penetrations, and skylights.
9. Team up with other construction employers and employees to identify best practices and share fall prevention solutions.
10. Get more information from the Occupational Safety and Health Administration (OSHA): Visit OSHA's Website at www.osha.gov or call (800) 321-OSHA.

This Safety Tips Sheet was developed through the Construction Roundtable of OSHA's Alliance Program for informational purposes only. It does not necessarily reflect the official views of OSHA or the U.S. Department of Labor.

Fall Prevention Safety Tips for Employees

It only takes a second for a fall to occur. Falling only a few feet can result in serious injury or death.

1. Understand your company's written fall prevention plan.
2. Attend and participate in fall prevention training.
3. Use fall protection equipment if required for the job. Be sure that the equipment is right for the task, fits properly, and is in good condition.
4. Inspect fall protection equipment (for example, harness systems) and devices (for example, guardrails and tie-off points) before each use.
5. Make sure that floor holes, open shafts, and riser penetrations are protected by sturdy guardrails or covers.
6. Get specialized training before working on scaffolds, lifts, or ladders.
7. When using scaffolds, make sure there is proper access, full planking, stable footing, and guardrailing.
8. Keep your feet firmly on the platform of a boom lift and tie-off at all times.
9. Chose the correct ladder for the task, read the instructions, and be sure that the ladder is in good condition. Check for surrounding hazards, stable footing, and the proper angle.
10. Identify skylights and make sure they are properly protected.
11. Contact your supervisor if you see fall hazards or have any other questions about fall prevention. Do not work until unsafe conditions have been corrected.

12. Get more information from the Occupational Safety and Health Administration (OSHA): Visit OSHA's Website at www.osha.gov or call (800) 321-OSHA.

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OSHA Update

OSHA Updates

FY 2007 Budget Request Includes \$11.2 Million Increase for OSHA

The President's budget request of \$483.7 million for OSHA during FY 2007 provides "the resources we need to continue to improve our efforts to further cut worker injuries, illnesses and fatalities," said Acting Assistant Secretary of Labor for OSHA Jonathan L. Snare during a briefing in Washington, Feb. 6. The request includes increases for federal enforcement, compliance assistance and safety and health statistics.

OSHA Announces FY 2005 Enforcement Results

OSHA recently announced the results of its "effective, focused, and consistent" enforcement program for FY 2005. Acting Assistant Secretary of Labor for OSHA Jonathan L. Snare said the agency cited 85,307 total violations of OSHA standards and regulations during the year, an overall increase of 9.5 percent over the last five years. Of particular note was the increase in willful violations issued during the year (62 percent over FY 2004).

The agency also exceeded its total inspection goal for the year, and revealed major gains in the Enhanced Enforcement Program (EEP) -- a 200 percent increase from FY 2004 for the number of inspections that qualified as EEP cases. The EEP is a program is directed towards employers who expose their workers to serious safety and health hazards and who continue to defy worker safety and health regulations.

"The majority of employers in our country consider the health and safety of their workers a priority and strive to do their utmost to ensure their well being," said Secretary of Labor Elaine L. Chao. "Still, there are those who, despite OSHA's enforcement and outreach efforts, continually disregard their very basic obligations under the Occupational Safety and Health Act. This enhanced enforcement policy is meant for them."

OSHA's Enhanced Enforcement Policy will focus on those employers who have received "high gravity" citations. High gravity citations are issued when an employer's violations are considered to be at the highest level of severity.

The policy focuses on five specific areas that will be strengthened: (1) follow-up inspections; (2) programmed inspections; (3) public awareness; (4) settlements; and (5) federal court enforcement. This initiative impacts establishments that received OSHA citations with the highest severity of willful violations, multiple serious violations at the highest level of severity, repeat violations at the originating establishment, failure-to-abate notices, or a serious or willful violation associated with a fatality.

New OSHA Administrator Nominated

Secretary of Labor Elaine L. Chao recently announced that the United States Senate has confirmed Edwin G. Foulke Jr. of South Carolina as Assistant Secretary of Labor for Occupational Safety and Health.

President George W. Bush nominated Foulke Sept. 15, 2005, to head the Occupational Safety and Health Administration (OSHA). "Ed has extensive knowledge and experience in workplace safety and health issues that he will put to use to protect workers and promote employer compliance," said Secretary of Labor Elaine L. Chao.

Prior to his nomination, Foulke was a partner with the law firm of Jackson Lewis LLP in Greenville, S.C., and chaired the firm's OSHA practice group. He served on the Occupational Safety and Health Review Commission from 1990 to 1995, chairing the commission from March 1990 through February 1994. The commission is an independent federal adjudicatory agency that renders decisions in job safety and health disputes arising from inspections conducted by OSHA.

As head of OSHA, Foulke will be responsible for administering a comprehensive program to assure the safety and health of America's workers by setting and enforcing standards, providing training, outreach and education; and establishing partnerships and alliances that encourage continual improvement in workplace safety and health.

A native of Perkasio, Pa., Foulke graduated from North Carolina State University in 1974. He received his Juris Doctor from Loyola University in 1978 and a Master of Law (LL.M.) degree from Georgetown University Law School in 1993. He also served as an adjunct professor at St. Mary's Dominican College in New Orleans.

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