



OSHA 300 Log Revisions

The Occupational Safety and Health Administration (OSHA) has revised the 300 Log of Work-Related Injuries and Illnesses to create forms that are easier to use. The revised log is required for use in facilities for recording occupational injuries and illnesses as of January 1, 2004. Changes include the following:

- The “days away from work” column has been placed before the “days on job transfer or restriction” column.
- Clearer, more understandable formulas for calculating incidence rates are provided in the OSHA 300 series.
- A “hearing loss” column is provided on the 300 Log and is defined as “a change in hearing threshold relative to the baseline audiogram of an average of 10dB or more in either ear at 2000, 3000, and 4000 hertz, and the employee’s total hearing level is 25dB or more above audiometric zero in the same ear(s)”.
- A more prominent column heading, “Classify the Case”,

makes it clear that the employer must mark only one selection among the four columns offered (Death, Days away from work, Job transfer or restriction, and Other recordable case).

Also of note is the revoked proposed requirement for employers to check a musculoskeletal disorder (MSD) column on the OSHA 300 Log. As such, there is no MSD column included on the revised 300 Forms, however, employers must adhere to the required recording criteria when determining whether to record a MSD on the OSHA 300 Log.

Injuries and illnesses for dates preceding January 1, 2004 should continue to be recorded on the applicable OSHA 300 Form. The 2003 300A Summary of Occupational Injuries and Illnesses should be utilized for posting purposes for the February 2004 posting requirement. The revised 300A form, with the additional hearing loss information, will be re-

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Have you completed your DOT Security Plan Training?

As published in previous RCS Registers, the DOT requires certain facilities to develop and implement a Security Plan outlining security measures for physical, personnel, and en-route processes of facility operations. In addition to plan implementation, the DOT requires facilities to conduct formal training in these security issues, no later than December 22, 2003. This training must include the following elements:

- Company security objectives
- Specific security procedures
- Employee responsibilities
- Actions to take in the event of a security breach
- The organizational security structure

Please contact RCS, Inc. at 614-552-8530 if assistance is needed in the development or implementation of your training program.

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DOT Definition Changes

Effective October 1, 2004, new definitions and provisions to assure the safe transportation of hazardous materials in commerce will be in effect. Definitions for packaging of hazardous materials and their storage during transportation have been revised after concerns were voiced by manufacturers and couriers.

After DOT review, packaging specifications will stay the same and follow HMR regulations. The DOT will maintain jurisdiction over local and state government when regulating hazardous materials during transit.

To better understand this rule, the DOT has created a new term, "pre-transportation function". Pre-transportation functions include the loading of a package onto a transport vehicle, aircraft, or vessel, and follow the same requirements as in the HMR. Loading and unloading is now considered a function of pre-transportation and is subject to all applicable regulatory requirements. This revision was completed to resolve conflicts that occurred when accidents took place during the loading / unloading exchange.

If you have any questions regarding these changes, please contact RCS, Inc. at 614-552-8530.

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quired to be posted as of February 2005.

Copies of the revised 300 Log are available at the OSHA website:

www.osha.gov/recordkeeping/new-osh300form1-1-04.pdf

or by calling 1-800-321-OSHA.

In addition, OSHA 300 Log series from previous years will remain available on the OSHA website for employer use.

"Quality" is something few people can define, but everyone knows when you do (or more important, when you DO NOT) see it. An ambiguous term, quality is defined by the consumer and therefore may be different for each person. It is an ever-changing state, what is good enough today may not be tomorrow.

Quality can not be avoided! The concept of quality factors into many decisions, whether consciously or subconsciously. Think about choosing a restaurant, grocery store, automobile, or even a home - what qualities do you consider? Convenience, value, durability, location, and a friendly, helpful staff come to mind. These are probably some of the same qualities that YOUR customers consider.

Quality is an approach to doing business that is associated with the following areas:

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Quality Corner

- Products
- Services
- People
- Processes
- Environments

If you have not done so already, implementing a Quality program will help you address each of these five important areas, and ensure you are meeting or exceeding your customer's expectations in each of them. If you have already incorporated a Quality program, it is important to make sure it is evaluated and revised on a regular basis. A Quality program is useless if it is not followed, or if it does not keep up with the ever changing business environment.

RCS associates are always available to assist with implementing or updating your company's Quality program. Please contact us at 614-552-8530 if you have any questions.

EPA Info

Air Quality Returned to Normal Levels in November from the Southern California Wild Fires

As of November, 90% of the Southern California wild fires were contained, no longer threatening the surrounding communities. Air quality levels have returned to normal, however, not before devastating the involved California communities. The Environmental Protection Agency reports that over 800,000 acres were burned, 3,400 homes destroyed, and 22 lives lost as a result of the wild fires. In addition, the EPA indicated that during the fires, air quality level readings reached maximum concentrations up to three times the maximum allow-

able standard for particulate matter.

Wild fires are a natural element of an ecosystem, resulting from buildup of vegetation serving as a natural fuel source. The addition of warm weather conditions and consistent winds brings about ideal circumstances for wild fire to persist over long periods of time. While wild fires are a natural event, many communities become affected by the smoke that is emitted. Smoke is made of a complex mixture of gases and other fine particles produced when wood and other organic matter burns. Health threats come from the airborne fine particles, which can get in people's eyes and respiratory system to cause a variety of health problems. These microscopic particles can aggravate

pre-existing heart and lung problems and have been linked to premature deaths in people with these conditions. Children, the elderly, and persons with chronic heart and lung problems are at an increased risk of smoke exposure.

The Environmental Protection Agency, National Park Service, US Forest Service, Bureau of Land Management, and the US Fish and Wildlife Services are continuing efforts to develop smoke management programs and techniques to reduce hazardous levels of fuel buildup in susceptible areas including the foothill communities throughout California.

Superfund Sites Continue to be Cleaned Up

The Environmental Protection Agency (EPA) announced that forty (40) high-priority hazardous waste sites were cleaned up in the 2003 fiscal year (October 2002-October 2003). The EPA designates high-priority sites on the Superfund National Priorities List (NPL) as sites with high hazardous properties from mistreatment and disposal of regulated substances onto the land and into the groundwater. These sites are considered some of the highest health threats in the nation.

To date, the EPA has cleaned 866 NPL sites and are currently underway with clean-up activities at an additional 436 sites. Clean-up at these sites can be time and cost prohibitive, and at times very complex. While clean-up activities are largely funded by those corporations and persons responsible for contaminating the land / water, additional money is necessary from the government. As of last year, the EPA secured over \$20 billion in clean-up commitments from polluters, and added \$292 million in government revenues

to aid in the clean-up efforts.

Each year, additional sites are added to the Superfund National Priorities List. For example, the Columbia space shuttle disaster was added to the NPL this year. The goal of the EPA is to decrease the number of NPL sites annually, and continue their efforts to actively clean-up hazardous waste sites to provide a healthier, cleaner living environment for US citizens.

Did You Know?

Propane Distributor's Failure to Provide Adequate Conditions Leads to \$75,000 in Penalties

An Oklahoma City propane distributor is being cited for failing to follow safety procedures dealing with storage and handling of propane cylinders. These citations resulted from an OSHA investigation following a fire and explosion at the Oklahoma City company when a propane cylinder vented gas and ignited. OSHA cited the company for exposing compressed propane cylinders to solar heat, causing the cylinders to vent propane gas resulting in fire and explosion. Two additional alleged serious violations were handed out by OSHA for failing to perform an initial process hazard analysis and not utilizing approved forklifts in hazardous substance storage locations. An alleged serious violation is one that involves a substantial probability that death or serious physical harm could result and the employer knew or should have known of the hazard.

While this incident occurred at a propane cylinder distributor, all facilities must comply with propane cylinder storage to ensure that an emergency does not occur such as the one at the Oklahoma City company. OSHA requires that LP gas tanks awaiting use or resale (such as those for use on industrial trucks) must be stored in accordance with 29 CFR 1910.110. The following outlines the general requirements for storage of LP-gas cylinders:

- Storage must be located to minimize exposure of the tanks to excessive temperatures, damage, and tampering by unauthorized personnel.
- Storage may occur inside or outside a facility provided the following conditions are met:
 - Outside storage: must be in an approved protective cage, at least 10 feet from adjacent properties, pedestrian sidewalks, and vegetation growth.
 - Inside storage: should not exceed 300 pounds of propane, and must be located away from exit routes, stairways, and areas of general use to prevent unauthorized personnel from accessing the cylinders.
- At all times, cylinder valves must be protected from damage and tampering.

In addition to the above general requirements, additional standards may be applied based on applicable fire codes and the local authority's guidelines.

The additional violations at this company resulted from failing to perform an initial process hazard analysis and utilizing unapproved forklifts in hazardous substance storage locations. Any time a facility initiates storage / handling of a hazardous substance / material / chemical, the facility must perform a hazard analysis to identify potential hazards involved with the storage and handling of the prod-

uct. This information must then be conveyed to employees in the form of a safety course, which outlines the requirements and standards for handling, storing, and transporting the material. If the material requires special storage and handling requirements, the facility must ensure that approved equipment is utilized for all handling processes. This includes forklifts and specialized storage rooms.

Placarding

Harmful or Helpful?

Are placards more important for protection, or do they aid a terrorist in identifying hazardous materials? In response to this placarding concern, RSPA and OHMS conducted reviews on placarded shipments of hazardous materials. To ensure the safety and security of these materials in transport, surveys by both agencies concluded that placards provide important information about hazards, but not necessarily about their commodities. The quantity of these materials can not be determined by the presence of placards. Placards can be found on freight that may carry residue, which would be insignificant in carrying out a terrorist attack. It was concluded by both organizations that placards reduce or eliminate disruptive effects of terrorism and enhance security.

Office Accidents

Most accidents that occur in the work place are caused by trips and falls, falling objects, striking against objects, and being caught in or between objects. To prevent these accidents, you first must recognize you first must recognize how such accidents occur.

Falling is the most common injury for office workers. Some of the common causes for falls are stairs, curbs, and slippery floors. Other causes are tripping over objects in hallways, carrying objects so vision is limited, not using proper techniques when reaching for objects, trying to pick up items while seated, and striking open drawers when walking.

The most common cause for falling objects is improper storage of materials. When objects are not carried or handled correctly, they may easily fall out of the carrier's hand onto their feet. Improper storage may also make shelves and filing cabinets unstable and conse-

quently fall. Also, leaving objects on the corner of desks, tables, cabinets, etc. make it easier for objects to fall.

Striking against objects typically occurs when a person is not paying attention. Bumping into objects such as closed doors, door frames, desks, filing cabinets, and other protruding objects may easily occur and cause injuries. People also strike objects when bending to file. Striking sharp objects, such as the corner of a drawer, may result in lacerations.

Being caught in or between objects is another significant accident type that can be prevented through worker concentration. Fingers can easily be caught in doors, elevator doors, windows, drawers, office machines, and paper cutters.

Below are some simple steps to prevent office accidents and promote office safety:

- Keep your work area clean and

orderly.

- Keep all aisles and floors clear of tripping hazards.
- Close drawers completely.
- Clean up spills immediately.
- Make sure your vision is not obstructed while carrying items.
- Always use a stepladder for overhead reaching.
- Avoid excessive bending, twisting, and leaning backward while seated.
- Lift with your legs.
- Do not lift anything too heavy.
- Pay attention to where you are walking and what you are doing at all times.
- Load filing cabinets from the bottom up, with heavier items on the bottom.
- When possible, store materials inside cabinets, files, and lockers.

Personal Page

Does Exercise Improve Work Performance?

According to a poll taken by Vault Corporation, a career assistance company, 95.5% of persons asked stated that exercise does improve their work performance by making them more relaxed (15.6%), more alert (21.9%), feeling in better health (28.1%), and having a better self-image (26.6%). Would offering/allowing employees the time or opportunity to exercise improve the overall efficiency of a company? World power Microsoft thinks so. They

have assigned personal trainers to all of their 1,500 employees in the European Product Development Center. Studies have indicated that regular exercise lends to more motivated, responsive, and energetic employees, which increases company morale and improves productivity and creativity.

While there are some people who do not believe in exercise, those who do may benefit greatly from the opportunity to do so during the day. This may aid in employee retention and decrease the number of days lost from illness or

injury. It could be reasoned that allowing employees 1-2 hours to exercise during the day may increase productivity past the point of working a standard 8 hour day. Many companies and corporations are investing in corporate gym memberships or on-site workout facilities to allow employees the opportunity to exercise during the day. A good way to determine if this would benefit your organization could be to conduct an office poll asking if the opportunity to exercise during the day would increase employee interest, morale, and productivity.