What OSHA’s focus has been at cemeteries, funeral homes

Each year OSHA publishes citation statistics for the previous year. Take advantage of this information to look at what OSHA has been focusing on in your industry, and to evaluate your own safety programs.

Cemeteries
Listed below are last year’s five most frequent citations for lawn and garden services (the cemetery).

1. Personal protective equipment
2. Aerial devices
3. Hazard communication
4. General Duty clause
5. Electrical safety

Note that while there were only a few citations for OSHA’s excavations/trenching standard in your industry, this continues to be a major focus area for OSHA. Over $5 million in citations for violations of this regulation were issued across all industries last year.

PPE (personal protective equipment)
PPE violations topped the list for OSHA citations this past year. Each employer must determine what protective equipment is necessary for each employee and each task.

OSHA found that employers either were not providing necessary equipment for the job hazards, not providing employees with the proper training or not ensuring that employees were wearing the required equipment.

Last year, the most frequent PPE citations were:

1. General requirements. This includes proper selection and provision of equipment, adequate written program, adequate training and proper use and care of PPE.

2. Eye and face protection. Cemetery workers likely need eye and face protection from flying particles or dust when using lawn care equipment, and chemicals such as pesticides, growth inhibitors, algae or other cleaners. Full-face shields also may be needed to protect your face from these hazards.

3. Head protection. A protective helmet is required for any employees who could hit their heads or have something fall on them. Working in a grave and trimming trees are examples of where protective helmets are needed.

Employers must provide the correct hard hat for each employee depending on the needs of the job. Some helmets only reduce the force of a blow to the top of the head, while others reduce the force of a blow from both the sides and top.

In some cases, protective helmets that are designed to reduce electrical shock hazard may be required.

4. Respiratory protection. Respirators may be needed for protection from airborne pesticides, growth inhibitors, fertilizers or other lawn applications; grit and dust; or exposure that occurs when dry-cutting masonry or stone that contains silica.

Exposure must be determined for each chemical, and each respirator’s protection level must be adequate for the exposure level. Before using a respirator, a physician must determine that it is safe for the employee to use one and he/she must be trained on its use and care.

Your respirator program must be in writing.

Aerial devices
The “vehicle-mounted elevating and rotating work platforms” standard covers safety issues for aerial devices such as basket or bucket trucks and devices with extendable ladders.

Violations in this category include using
Hazard communication
Every year, hazard communication is high on the list, and this past year was no exception. If you use even a single hazardous chemical, you need a “Right-to-Know” program.

In 2012, OSHA updated the Hazard Communication Standard by adopting the Global Harmonization System (GHS) of classification and labeling of chemicals. GHS is an internationally agreed upon system that replaces the various classification and labeling standards used in different countries. Under the GHS, there is a single, consistent way of communicating hazards and how to use a product safely no matter where it is produced in the world.

The revised standard includes important changes to classification of chemicals, MSDS format (now called Safety Data Sheets, or SDS), and labels for chemicals. Be sure that you have Safety Data Sheets for all chemicals, safe handling and storage procedures for each chemical, PPE, quick-drench showers and eye-wash stations (as required), and a comprehensive training program for employees.

Your Hazard Communication Program must be in writing.

The deadline for employee training on new label elements and SDS format was December 1, 2013. The deadline for full compliance with the new Hazard Communication Standard is June 1, 2016.

General Duty Clause
The OSHA General Duty Clause is the “catch-all standard” to cover areas for which there is no specific regulation. It states that the employer must provide an environment “free from recognized hazards that are causing or are likely to cause death or serious physical harm to employees.”

Hazards must be identified before employees are exposed, preventative precautions must be taken and employees must be trained on these hazards and how to work safely.

Examples of these types of violations include equipment rollover (mowing on hill, exposure to crushing/drowning from mower tip-over, lack of rollover protection); falling (ladder, trimming tree from backhoe bucket); mowing with inadequate protection or training (lack of rollover protection or not wearing a seatbelt); amputation hazards posed by equipment; struck-by hazards such as exposure to traffic without appropriate warning signs, signals or barricades; heat or cold weather exposure; and exposure to overhead hazards, such as underneath a tree that is being trimmed.

Electrical safety
Electrical hazards were another frequently cited area. An average of one worker dies from electrocution on the job every day. Even low voltage or low current can cause serious harm or death.

Electrical safety issues in cemeteries include proper grounding, extension cord safety, guarding, lockout/tagout issues and wiring design and protection. Those at primary risk are employees who use electric powered tools for maintenance or lawn care, and anyone responsible for handling electrical issues.

Employers were frequently cited for insufficient employee training.

Funeral homes and crematories
Funeral service and crematories are classified as a separate industry by OSHA, and have a different set of citation data. The top five most frequent citations last year were:
1. Formaldehyde
2. Bloodborne pathogens
3. Hazard communication
4. Respiratory protection
5. Flammable liquids

Formaldehyde
The fact that formaldehyde is the subject of its own federal regulation emphasizes the need to protect employees from exposure. The Formaldehyde Standard 29 CFR 1910.1048 was updated in 2012 to conform to the Global Harmonization System of classification and labeling of chemicals (commonly known as the GHS). These changes involve signage, labeling, wording of warnings and communication of hazards.

The Formaldehyde Standard applies in addition to the provisions of the Hazard Communication Standard discussed above. A Formaldehyde Protection Program must include the following:

Engineering controls. Engineering controls must eliminate or reduce employee exposures as much as possible. Examples include enclosure and ventilation.

Monitoring of exposure limits. Air monitoring is required unless it can be documented that the operation cannot result in concentrations above the Action Level or Short Term Exposure Limit (STEL) under all expected conditions.

Personal protective equipment. When engineering and work practice controls cannot maintain exposure at acceptable levels, employees must use the proper PPE.

This may include impervious clothing, gloves, aprons and chemical splash goggles. Showers and eye-wash stations must be provided if splashing is likely. Respirators are also required where airborne concentrations exceed allowable limits. See below for more information on respiratory protection.

Training. In addition to the training requirements for hazard communication, personnel working with formaldehyde must receive annual chemical-specific information and training on their job assignment.

Employees must understand the hazards of formaldehyde and the control measures at your facility. Information also must be provided about signs or symptoms related to health effects of formaldehyde, and how to properly report them to the employer.

Proper formaldehyde storage.
Formaldehyde products must be stored in accordance with requirements listed on the SDS. All mixtures or solutions composed of greater than 0.1 percent formaldehyde and material capable of releasing formaldehyde into the air at concentrations reaching or exceeding 0.1 ppm must be labeled.

For all materials capable of releasing
formaldehyde at levels above 0.5 ppm during normal use, the label must contain the words “potential cancer hazard.”

**Proper formaldehyde waste disposal.** Formaldehyde waste must be stored in a labeled hazardous waste container for proper disposal, or made available for recycling, if practical.

**Bloodborne pathogens**

Bloodborne pathogens was the second most frequently cited standard last year. The key elements of a Bloodborne Pathogens Program include:

** Exposure determination.** Assess the risks of exposure to bloodborne pathogens (generally in the form of potential contact with body fluids) that employees may encounter at their work place. List the tasks and location where this contact can occur (e.g. cleaning out the refrigerated storage area).

**Engineering and work practice controls.** Engineering and work practice controls must be used to eliminate or minimize employee exposure. Some examples of engineering controls include needle handling and disposal procedures, labels and signs, hand washing facilities and housekeeping procedures.

**Written exposure control plan.** Policies for protecting employees against exposure to bloodborne pathogens must be in writing. The Exposure Control Plan must be accessible to employees. It must be reviewed and updated at least annually, or whenever new or modified tasks and procedures affect occupational exposure.

**Labels and signs.** Labels and signs must caution employees where exposure risks exist. Appropriate warning labels must be affixed to containers of regulated waste; refrigerators and freezers that contain blood or other potentially infectious material; and other containers that are used to store, transport or ship blood or other potentially infectious materials. This does not include public spaces such as crypts or viewing rooms.

**Personal protective equipment.** When engineering controls do not completely eliminate hazards, personal protective equipment must be used. The appropriate PPE must be provided to shield employees from exposure risks. PPE could include gloves, gowns, shoe covers, laboratory coats, face shields or masks and/or eye protection.

It is the employer’s responsibility to provide and maintain such equipment at no cost to the employee.

**Employee information and training.** All employees with occupational exposure must participate in a bloodborne pathogens training program. This training must take place during work hours and must be appropriate to the education level and language of each employee.

The person conducting the training must be knowledgeable in the subject matter as it relates to the workplace, and be able to answer employee questions.

**Vaccinations.** Hepatitis B vaccinations must be provided at no cost to all employees who will potentially be exposed as a part of their jobs.

These vaccinations must be performed by or under the supervision of a licensed physician or another licensed health care professional according to the recommendations of the U.S. Public Health Service that are current at the time that these evaluations and procedures take place.

**Post-exposure evaluation and follow-up.** Following a report of an exposure incident, the employer must immediately make available a confidential medical evaluation and follow-up, at no cost to the employee.

The employer must ensure that all laboratory tests are conducted by an accredited laboratory at no cost to the employee. The employer must obtain and provide the employee with a copy of the evaluating health care professional’s written opinion within 15 days of the completion of the evaluation.

**Recordkeeping.** Maintain records of employee training, as well as of injuries and accidents that are related to any bloodborne pathogen exposure in the workplace.

**Hazard communication**

For funeral homes as well as cemeteries, another frequently cited violation last year was hazard communication, e.g., having an inadequate “Right-to-Know” program.

See the hazard communication section under “cemeteries” for information regarding this important issue.

**Respiratory protection**

Funeral home personnel may need respirators to protect themselves from formaldehyde or other chemical exposures. Exposure must be determined for each chemical, and each respirator’s protection level must be adequate for the exposure level.

Before using a respirator, a physician must determine that it is safe for the employee to use one and he/she must be trained on its use and care. *Your respirator program must be in writing.*

**Flammable liquids**

In 2012, OSHA updated the Hazard Communication Standard by adopting the Global Harmonization System (GHS) of classification and labeling of chemicals. The Flammable Liquids Standard also was updated to incorporate these changes. Flammable liquids are now classified differently and labels have changed.

Flammable liquids often used in funeral homes include formaldehyde, cleaning products, alcohols and aerosols such as spray paint and WD-40. Even hand gels may be flammable. Additionally gasoline for vehicles, mowers and other equipment used for grounds maintenance and propane are flammable.

You may have other flammable liquids used or stored at your facility. Be sure that you have a program that includes safe use and storage of these liquids.

Sources of ignition are common in funeral homes, including open flames or candles, hot surfaces such as a retort, radiator, hot lawn care equipment or radiant heater.

Your safety program also must include control of ignition sources, a fire plan that identifies the equipment to prevent and detect fires and the means for fire control should an incident occur. The employer must also provide appropriate fire extinguishers in each location where a fire hazard exists.