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OCCUPATIONAL SAFETY: PART 7 OF 7

Are you following safe practices when maintenance work is being done on your crematory? Is your grounds equipment configured to be as safe as possible? Do your office employees know how to spot a frayed extension cord that shouldn't be used?

Reducing the chance of cuts, burns, shocks, bruises and worse injuries

Cemeteries are part of OSHA's Lawn and Garden Services classification. According to the U.S. Department of Labor, OSHA citations cost this industry nearly \$250,000 last year, and equipment safety incidents comprised half of these fines.

This is the cost of the OSHA citations only; it does not take into account any property damage, medical costs or lost work time or business that may be associated with unsafe work practices.

Avoiding equipment-related incidents requires that you understand OSHA requirements and have effective safety programs in place, including effective tool safety and machine guarding, lockout/tagout and electrical safety programs.

Your lockout/tagout safety program

A lockout/tagout (LO/TO) program is required to prevent the unexpected release of energy when equipment is serviced or maintained on site. While actual citations for LO/TO violations are infrequent, failure to follow safe procedures accounted for more than 75 percent of the fines levied for equipment safety violations.

An effective LO/TO program is especially critical because these accidents are typically very severe and can result in amputation, struck-by or electrocution injuries.

OSHA requires you to identify the practices and procedures necessary to shut down and lockout or tagout machines and equipment; provide locks; train employees on their role in the LO/TO program; and conduct periodic inspections to maintain or enhance your hazardous energy control program.

Assess hazards. First, identify what equipment must be locked out. Then, identify all of the energy sources for this equipment, including direct and hidden sources. Documentation must include the hazard posed, the magnitude of danger, any special or unusual conditions and the correct isolation methods and required devices. Include all electrical energy, pneumatic, hydraulic, kinetic, etc. sources.

Develop a LO/TO program. Your energy control or lockout/tagout program must be in writing and must include your hazard assessment, locks and tags to be used, who is authorized to perform LO/TO, your enforcement policy and training methods and your method for auditing and updating procedures.

You must develop written procedures for shutting down and locking out each machine or piece of equipment. Except in emergencies, each lock/tag must be removed by the person who put it on. Each employee must have his or her own locks and tags.

Make sure your written program accounts for situations where servicing lasts longer than one shift, where contractors are involved or where there is a group of employees servicing a piece of equipment.

Train your employees. A training program must consist of effective initial training and periodic retraining. You must have certification that training has been given to all employees covered by the standard.

The training each employee needs is based on the relationship of his or her job to the machine or equipment being locked or tagged out. OSHA identifies three types of employees: authorized, affected and other.

Authorized employees are those responsible for implementing the energy control procedures to perform the service and maintenance. They must understand the need for LO/TO procedures and be able to recognize hazardous energy sources. They must have a clear understanding of the means and methods of controlling the various types of energy sources, and of how to verify that each energy isolation is effective.

Affected employees are those who operate or use equipment on which servicing or maintenance is being performed under lockout, or who work in an area where servicing or maintenance is performed. Training for affected employees must ensure that they can recognize when a LO/TO procedure is being implemented.

The goal of this training is simple: Whenever there is a lockout or tagout device in place on an energy-isolating device, the affected employee must leave it alone and make no attempt to operate the equipment.

All other employees also must be able to recognize when the control procedure is being implemented and understand that they must leave LO/TO devices alone and not attempt to turn on or operate the equipment.

Retraining must be provided when there is a change in job assignments, machines, equipment or processes that present a new hazard; when there is a change in energy control procedures; or if an employee fails to use the energy control procedure. At minimum, retraining must be provided every three years.

Make periodic inspections.

Inspections of each energy control procedure must be performed annually. Employers must certify that the periodic inspections have been performed. The certification must identify the particular machine, the date of the inspection, the employees included in the inspection and the name of the person performing the inspection.

Use proper LO/TO devices. Four key characteristics must apply to all LO/TO Devices (locks and tags): they must be *durable*, meaning that they must withstand their environment for the length of the expected exposure; they must be *standardized* according to color, shape or size; they must be *substantial* enough to minimize early or accidental removal; and they must be *identifiable*, clearly identifying the person who applied them, and warning about hazardous conditions if the machine or equipment is turned on, including instructions such as:

- DO NOT START
- DO NOT OPEN
- DO NOT CLOSE
- DO NOT ENERGIZE
- DO NOT OPERATE

Your electrical safety program

Electrical hazards are another frequently cited area. In the United States, an average of one worker dies from electrocution on the job every day. Even low voltage or current can cause serious harm or death.

In February, OSHA issued a new electrical standard that formally adopts the

installation safety requirements of the NFPA 70E 200 edition. NFPA 70E should now be used as a “how to comply” guide to supplement the OSHA electrical safety regulation.

Assess hazards. Check your tools and equipment to ensure that the ground prong is present and that cords are in good condition. OSHA requires that live parts of electrical equipment operating at 50 volts or more be guarded against accidental contact.

Whenever conduit or electrical equipment is in a location where it could be exposed to physical damage, it must be enclosed or guarded. Junction boxes, pull boxes and fittings must have approved covers. Unused openings in cabinets, boxes and fittings must be closed.

Flexible cords are vulnerable because they can be damaged by aging, door or window edge contact, staples or fastenings used to hold them in place, abrasion from adjacent materials that they may contact and various activities in their proximity.

Improper use of flexible cords, or use of damaged cords, can cause shocks, burns or fires. Whenever possible, it is preferable to use one of OSHA’s recognized “hard” wiring methods. OSHA allows use of flexible cords only for certain applications.

Check your circuits regularly; an inexpensive tester can tell you if the ground is connected and can also test your GFI protection. Your safety program must include policies for grounding systems and electrical shut-off device systems.

Develop policies for use of ladders and scaffolding when around electrical devices. Extension cords have specific current ratings that must not be exceeded or they can overheat and cause a fire without tripping the circuit breaker.

Use a qualified electrician for installation and repair of any circuits.

Train employees. Personnel who are at primary risk of electrical hazards are those who work with or around electric-powered tools and equipment, and maintenance and janitorial staff who are responsible for handling electrical issues at your facility.

At lesser risk are all other personnel who work with or around other electrical equipment, including lighting, computers, coffee makers, etc.

Training must be adequate to the needs of each employee depending on exactly what he or she does at work. Employees

must understand built-in safety features of electrical systems, including insulation, ground fault circuit interrupters (GFCI), double-insulated devices, grounding (both of the circuit and the equipment), guarding of live electrical parts and fuses and circuit breakers.

Employees must also understand safe work practices, such as de-energizing electric equipment before inspecting or making repairs, correct usage of flexible cords and extension cords, recognition of damaged electric tools and procedures to remove them from use, how to work safely near energized lines and use of personal protective equipment.

Your tool safety and machine guarding safety program

Assess hazards. Safe tool usage and machine guarding violations were the most frequent equipment-related citations last year. In the death care industry, there are pinch points and dangerous operations that require various doors, covers and guards to protect personnel. These hazards include lawnmower blades, the interior of a cremation unit, common maintenance equipment and other groundskeeping equipment, such as string trimmers.

Machine guards are structures that separate and protect the operator from the point of operation of a machine or tool, hot surfaces, ingoing nip points, rotating parts and flying chips or sparks produced when using the equipment.

The first thing you have to do is assess the specific hazards by evaluating each piece of equipment. If a machine is new, determine all areas requiring protection. Replace any missing guards before allowing anyone to use the equipment.

If the machine is old and needs guards, determine if the machine is still made. If so, contact the manufacturer and ask for information on the current guards supplied with new machines. Purchase or replicate the new guard configurations to provide protection.

Discard any equipment which cannot be adequately guarded.

Develop a safety program. After you have assessed the hazards and have adequate guards on your equipment, develop your safety program. Equipment operators must leave the guards on *at all times* unless the equipment is locked out. Include your policy on removal of guards,

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including who is authorized to do it, and required LO/TO procedures. Also include discipline for employees who remove or bypass guards.

Train employees. Next, explain the function and purpose of guards to each affected employee. Managers and employees must be familiar with the proper guards so they can recognize when something is missing. If your employees do not understand your program and the purpose and function of the guards that affect them, they are more likely to bypass or remove them.

Developing a safety program may seem like a daunting and expensive task for your business; but it is essential and is money well-spent. Studies have shown a \$4 to \$6 return for every dollar invested in safety and health. This series has covered six of the major safety programs typically needed at cemeteries, funeral homes and crematories. □