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Studying the sorts of violations cemeteries, funeral homes and crematories are most frequently cited for by OSHA is one way to determine how to give your safety program a check-up.

## Checking out safety at your funeral home, crematory or cemetery before OSHA does

OSHA (the Occupational Health and Safety Administration) recently published its citation information for October 2006 through September 2007, giving us a good idea of what sorts of safety issues the agency has been focusing on in the cemetery, funeral home and crematory business. Let's take a look at the data in detail so you can evaluate the safety programs in place at your organization.



### Cemeteries

Listed below are the five most frequent areas in which citations were given in lawn and garden services businesses (the category that includes cemeteries):

1. Hazard communication
2. Guarding
3. Personal protective equipment
4. General duty clause
5. Electrical

There were only a few citations in this industry for not following OSHA's excavations/trenching standard, but cemeteries should note that this is now a major focus area. Last year, OSHA issued over \$5 million in citations for violations of this regulation across all industries. (See "Working safely in and around graves," in the December issue of ICCFA Magazine, for information about safe excavation.)

**Hazard communication.** The single most frequently cited violation last year was for hazard communication, e.g., having an inadequate "Right-to-Know" program. A hazard communication program that meets OSHA requirements includes:

- **Material Safety Data Sheets (MSDS)** for all chemicals;

- **safe handling and storage procedures** for each chemical;
- **personal protective equipment (PPE)**;
- **quick drench showers and eye wash stations** (as required);
- **comprehensive training program** for employees; and,
- **if you have more than 10 employees, your Hazard Communication Program must be in writing.**

**Guarding.** Machine guards separate and protect people 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. In the cemetery business, hazards are posed by lawnmowers and other groundskeeping equipment such as string trimmers, and also by portable power tools commonly used for maintenance. Each piece of equipment must be examined for adequate guarding and safety features. Equipment that cannot be adequately guarded should be discarded. After ensuring that there are adequate guards on all equipment, you must develop a safety program.

Guards must be left on *at all times* unless the equipment is locked out. A safety program should include a policy on removal of guards, including who is authorized to do it, and required lockout/tagout procedures. It also should include discipline for employees who remove or bypass guards.

The function and purpose of guards must be explained to each affected employee. When operators do not understand the purpose and function of the guards that affect them, they are more likely to bypass or remove them.

Managers and employees must be familiar with the proper guards so they can recognize when something is missing.

**PPE (personal protective equipment).** PPE violations topped the list for OSHA citations this past year. Each employer must assess what protective equipment is necessary for each employee and each task. Your PPE program must be in writing. OSHA found that employers either were not providing necessary equipment to protect against job hazards, not providing employees with the proper training or not

ensuring that employees were wearing the required equipment.

Even when the employee furnishes his or her own protective equipment, it is the employer's responsibility to assure its adequacy on an ongoing basis. This past year, PPE citations were issued, in order of frequency, on the following:

- eye and face protection,
- hand protection,
- respiratory protection and
- head protection.

**Protective equipment for eyes, face, hands and head.** Each employer must determine what protection is needed, train employees on using this protection, and ensure that it is used/worn as required.

**Respiratory protection.** Cemetery personnel may need respirators to protect themselves 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.

Employee exposure must be determined for each chemical, and each respirator's protection level must be adequate for the exposure level. OSHA revised its respiratory protection standard effective in November 2006. To determine what respirator to use and how long it lasts, OSHA and NIOSH have developed a rating system for respirators, the assigned protection factor (APF). Another new term, maximum use concentration (MUC), has also been incorporated into the revised OSHA standard. It is important to review your program and ensure that you are in compliance with the new standard.

**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." You must identify hazards before employees are exposed to them, take preventive precautions and train employees about these hazards and how to work safely around them.

While citations in this category ranked fourth in frequency, *violations of this standard comprised 30 percent of the total citation dollars last year, more than double the cost of any other category.* This includes such violations as mowing with inadequate protection or training (lack of rollover pro-

tection 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; exposure to overhead hazards (such as standing underneath a tree being trimmed); and inadequate fall protection.

**Electrical.** Electrical hazards were another frequently cited area. An average of one worker dies from electrocution on the job every day. Even low voltage or current can cause serious harm or death. Electric power-operated tools must either be of the approved double-insulated type or grounded in accordance with OSHA regulations. Never use electric cords for hoisting or lowering tools.

OSHA issued a new general industry electrical standard that became effective on August 13, 2007, the first update since 1981. Be sure that you are in compliance with this new standard.



### Funeral homes and crematories

OSHA classifies funeral service and crematories in a separate category, with its own set of citation data. The top five most frequent citations last year were:

1. Formaldehyde
2. Bloodborne pathogens
3. Medical and first aid
4. General duty
5. Recordkeeping

**Formaldehyde.** The fact that formaldehyde is the subject of its own federal regulation emphasizes the need to protect employees from exposure. The formaldehyde standard is in addition to the provisions of the hazard communication standard covering exposures to all hazardous chemicals or substances. Employers must develop a Formaldehyde Protection Program. This program must consist of the following components:

- **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 (PPE).** 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. Where airborne concentrations exceed allowable limits, respirators must be used and a full respirator program put in place. Showers and eyewash stations must be provided if splashing is likely.

• **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 on how to properly report them to the employer.

• **Medical surveillance.** Medical surveillance must be provided for personnel with exposures to formaldehyde at concentrations above acceptable levels and for those who develop signs and symptoms of overexposure.

• **Formaldehyde storage.** Formaldehyde products must be stored in accordance with requirements listed on the MSDS. 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 parts per million (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."

• **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 pathogen citations were the second most frequent 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 work. 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 house-keeping 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 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 also 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 any employee who will potentially be exposed as a part of his or her job. 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 related to any bloodborne pathogen exposure in the workplace.

**Medical and first aid.** The third most frequent citation was for inadequate medical services and first aid. OSHA requires you to have medical personnel readily available for advice, consultation and care. In the absence of a nearby medical facility, you must have first aid personnel with adequate training and sufficient first aid supplies. First aid supplies must also include personal protective equipment to prevent exposure of the responder to blood and other body fluids.

**General duty clause.** Again, the OSHA general duty clause covers all safety issues for which there is no specific regulation. In funeral homes and crematories, these types of violations included incidents similar to those in cemeteries, such as a lawnmower overturning with the driver not wearing a seatbelt, inadequate employee training and lack of protection against falls when trimming trees. The employer is responsible for assessing all hazards and providing protection and training to employees.

**Recordkeeping.** OSHA requires businesses to keep records for multiple reasons. First, records are used to track causes of injuries and illnesses across the country to determine the need for new regulations. Second, a company's injury and illness records show OSHA that you have provided a safe workplace. And finally, you must use your records to learn where you need to concentrate your efforts to improve safety.

Many cemeteries, funeral homes and crematories are exempt from some record keeping requirements, but certain requirements apply to all establishments. Be sure that you understand your obligations. □