

Carol Becomes a CSP

Carol Keyes, one of the owners of CHESS, is now a Certified Safety Professional (in addition to being a Certified Rehabilitation Counselor).

The CSP is the most rigorous safety credential offered in the US – akin to becoming a CPA or PE. To obtain the certification, Carol had to show that she had years of professional safety experience, submit transcripts and recommendations, and pass two days of rigorous exams on every aspect of safety from engineering to adult learning.



OSHA Recordkeeping and Environmental Deadlines

Note the following upcoming deadlines for OSHA recordkeeping, hazardous waste generators and air quality permit holders.

When	What	Who it Impacts
Dec 15	Hazardous waste management reports due for Hennepin County	SQG and VSQG hazardous waste generators
Jan 10, 2011	Compliance deadline for NESHAP 6H regarding spray operations	Spray painting operations (collision shops)
Jan 31	Hazardous waste management annual report and license renewal for all metro counties, except Hennepin	SQG and VSQG hazardous waste generators
Jan 31	OSHA 300 log – post from February 1 until April 30	Employers with 10 or more employees
Mar 11 (don't wait until March for this)	Self-evaluation checklist due for NESHAP 6H	Spray painting operations (collision shops)
Mar 11	Notification of compliance due for NESHAP 6H	Spray painting operations (collision shops)
Apr 1	VOC reports due (forms should be mailed in mid-Dec to early Jan)	Air Quality Permit B and Permit D holders

Greenhouse Gas Emission Rule Changes Affecting Air Quality Permit Holders

Air Quality Permit holders in Minnesota have received information from the MPCA about changes in greenhouse gas emission calculations and new permitting requirements. Federal laws to regulate greenhouse gases (GHG, implicated in climate change) need to be adopted in Minnesota. The major source of GHG is combustion. The gases from combustion used to be considered insignificant activities, which did not affect air quality permits. That's changing.



Under the new rules, which were scheduled to go into effect in late January, 2011, it appears that B Permit holders will need to know how much fuel they burn each year, and from that, calculate their GHG potential emissions. If GHG potential emissions are high, B permit holders will need different permits.

Check the size of any boilers, furnaces, and other fuel burning equipment. If each piece of equipment has a capacity under 30,000 BTU/hour and if all of your fuel-burning equipment, added together, are under 500,000 BTU/hour, you can probably ignore this new requirement. But the standard household furnace is usually around 60,000 BTU/hour (give or take), so many facilities will now have to at least calculate emissions. (Don't worry about your home furnace - that's exempt).

Many shops will fall into one of these categories listed below, so will have to list their fuel-burning equipment in their permits, but they're still considered insignificant uses, so the type of permit won't change:

- If you have space heaters that use kerosene, natural gas, or propane.
- If the BTU/hour output of your boilers/furnaces/etc. combined are under 2 million BTU/hour, and each unit is under 500,000 BTU/hour.

Shops with spray booths that have bake cycles may well exceed those limits. That could change the type of permit you have.

Although the rules are supposed to go into effect in late January, 2011, the MPCA won't begin any enforcement action until after July 1, 2011. We will continue to monitor the MPCA website for updates.

If you are a CHESS maintenance client, we will be helping you with this. If you aren't a maintenance client and want assistance, give us a call.

Safety Resources

CHESS prides itself on finding good resources for our clients. Whether you are looking for safety supplies (Continental Safety), machine guarding (Lovegreen Machine Safety), prescription safety glasses (Twin City Optical) or lab analysis (Pace Analytical), we have the resources for you. Many of the vendors we work with offer a discount to our clients. If you are looking for a safety or environmental resource, or even for a health insurance broker or human resource consulting, give us a call.

Through January 31, 2011, Lovegreen is offering a discounted price on their drill press chip shield when ordered online.

<http://www.lovegreen.com/shop/Scripts/prodView.asp?idproduct=689>



Faceshields and Logging

If you have employees who do tree trimming and brush clearing, they are doing logging operations, according to OSHA. Are they wearing the correct face protection, to shield them from stray branches and chips? If they are operating a chainsaw, a mesh face shield is sufficient. That is often sold as part of a logger's helmet, integrated hard hats with hearing protection and the face shield attached to the hard hat. It's effective at keeping small limbs, branches, and saplings from poking the employee's eye or cutting the employee's face when moving through the woods, but does not restrict vision or fog up.



The mesh face shield isn't suitable for employees operating a chipper. They need to wear a clear face shield that meets ANSI Z87 (American National Standards Institute) standards for impact and penetration resistance for eye and face protection. With chippers, there's less of a risk of a poke from a branch. Instead, the concerns are objects bouncing or thrown from the chipper. As always, safety glasses need to be worn with the face shield.

All employees doing logging or tree trimming operations must have first aid training. If you need assistance with first aid training for full time or seasonal employees, contact us for competitive pricing.

OSHA 300 Logs

Employers with more than ten employees must keep a log of all injuries and illnesses on the job that require more than first aid. The log summary (OSHA 300A) must be posted from Feb 1 through April 30.

- The OSHA log only includes injuries that require more than first aid. Even though an employee may go to the doctor, unless there is actual treatment, that injury may not have to be recorded on the log. Treatment could include a prescription, stitches, physical

therapy or job restrictions. It does not include diagnostics.

- Never post the pages with employee names.
- You must include your SIC or NAICS code on the summary.
- The summary must include the average number of employees in 2010 and the total number of hours worked by all employees. This does not include vacation or paid time off.
- The 300A log summary must be signed by the owner or an executive of the company

To help with keeping the OSHA log, CHESS is rolling out a new service. Our maintenance clients or “services by subscription” clients can send us their injury reports (in addition to submitting them to the insurance company). We will contact you to determine if the injury is OSHA-recordable. We can also help with accident investigations, coordinating with treating physicians, identifying light duty work and helping you ensure the employee is able to keep working.

Workers Compensation Q&A

To address some of the mystery of workers’ compensation and the impact it can have on a company, we will have a work comp Q&A column this year. If you have a question you want addressed, let Carol know (carkey@chess-safety.com).



When should a First Report of Injury be sent to the insurance company?

You should notify your insurance company of injuries that occur in your workplace. If an employee sustains an injury, fill out the first report of injury (FROI). If the employee chooses to not get medical treatment, you can still send the FROI to your insurance company, accompanied by a note stating the employee did not seek medical attention. The insurance company will open and immediately close the file.

The advantage of doing this is if the injury worsens and the employee subsequently seeks treatment. For example, an employee slips on the ice and mentions that his back is really sore. He doesn’t want to seek treatment, thinking it will just get better in a few days. You complete the FROI and send it to your insurance company, letting them know that the employee has not received treatment.

A week goes by and the employee decides his back still hurts and goes to the doctor. Now therapy is prescribed and the employee is given restrictions. You just notify the insurance company of the change in status. They re-open the claim. You have notified them in a timely manner, so will not be penalized. No one has to try to remember the circumstances of the injury as it is already documented. The quick open and close cases do not work against you when calculating your future premiums. But, that is another column...

Questions? Please do not hesitate to contact us if you have safety-related questions or just need more information about something or the services we offer. Please contact us by phone (651-481-9787) or email (deb@chess-safety.com) if you no longer want to receive newsletters or if you want them in a different format (email, mail).

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