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Complete Health Environmental and Safety Services

AWAIR Again

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That's not a typo. It's an acronym, for A Workplace Accident and Injury Reduction Act, a Minnesota law that requires industries with higher injury rates to develop basic safety and health programs. Automotive repair shops were once required to have that. Car dealers were required to have that from 1999 to 2009, and again beginning in 2011.

The peculiarity: Minnesota OSHA is required to update the list of which industries need AWAIR programs every two years. If an industry's rate drops, it may come off the list. That's been the case with body and mechanical shops (and briefly, car dealers). From 1999 to 2003, if a shop had an OSHA inspection, the inspectors would ask to see the companies' AWAIR programs. As of 2003, they stopped asking. Now, they'll begin again. (Confusing? Yes. MNOSHA has talked about revising the law to eliminate that on-again, off-again characteristic, making it required across all industries. And there's been discussion on the federal level about requiring this type of program).

What's the purpose behind the law? To get companies to stop and think about how they ensure employees are protected from harm. It's just like saving for retirement: if you don't plan for it, fortune may smile on you, maybe, and you'll be fine. But if you plan for it, you'll find fortune smiling a whole lot more.

An AWAIR program is pretty simple. Start by identifying why you don't want your employees hurt. Is it because you fear OSHA and regulatory wrath? Is it because injuries cost too much? You like your guys, and it pains you to see them in pain? You dislike all the hassle of having to find replacement employees? All are perfectly legitimate reasons. Decide on your reason, and write it down. That's your **basic policy statement**.

Decide who has overall **responsibility** for safety oversight. Everyone has the responsibility to act safely, but someone needs to be the safety manager. If it isn't you, it needs to be someone with enough authority to get things done. An example: a long time customer asks you if you'd repair a seam on the inside of a chemical tank. You have good welders, so the job is clearly within your shop's capability. Who will decide that you won't do that job, because it is too hazardous? That's your safety manager.

Think about how you'll **communicate** safety issues to employees, and how they'll let you know of concerns. Do you have weekly shop meetings? Here's an easy idea: include a safety minute. That could be the chance for anyone to raise a concern, or your chance to discuss the hazards and safeguards of a particular task.

The best way to deal with an injury is to avoid its occurrence. So give some thought about how you'll **identify hazards and correct them**. One way: assign a weekly safety walkthrough to

your employees, rotating the duty. Each week, that employee will walk through the shop, looking for potential hazards. Another: encourage employees to bring up concerns, anonymously if necessary. A third: require reporting of close calls, those situations where luck resulted in no harm. Yet another option: step by step review of different tasks, looking for what could go wrong at each step (that's commonly called a job hazard analysis). And don't forget looking back at what injuries you've had, and thinking about ways to prevent recurrences.

Because **injuries** do occur, spell out your procedure for dealing with them. You do want to look into what went wrong. Usually, injuries happen during routine operations. So what went wrong this time? What made this one different? It's unwise to blame bad luck for injuries occurring, because then you need to blame good luck for a lack of injuries. Again, compare your safety program to your retirement plan. You can rely just on luck, but your chances that your luck will be all good are awfully slim.

In an ideal world, employees promptly do exactly what you tell them to do, without your even needing to speak. In the real world, that doesn't happen. In the work world, you make efforts to get them to do what they should. Those efforts are positive (wages, time off, bonuses, promotions, praise) and negative (warnings, unpaid time off, firings). Treat safety performance the same way. Consider it an integral part of the job. An employee doesn't wear safety glasses? Make sure he knows what is required. Still refuses? Write him up. Give him a warning. If he keeps refusing to do what you tell him to do, fire him. You'd do the same if he consistently refused to punch in, or refused to work on any red car. Why treat safety performance any differently?

That's your AWAIR program: Policy, responsibilities, communication, hazard identification and correction, injury investigation, enforcement of the rules. Write it down. Take a half hour to go over it with employees. Then implement it. The result: a workplace that relies less on luck, and more on sound planning.

If you have questions about AWAIR programs, OSHA compliance personal protective equipment, or other safety or environmental issues, contact CHESS at 651-481-9787; toll free at 877-482-4377, or carkey@chess-safety.com

This article is intended to provide general information (not advice) about current safety topics. To discuss your specific concerns and how CHESS may help, please contact CHESS at 651-481-9787 or chess@chess-safety.com

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