On June 13, 2019, the waste industry suffered three fatalities making it one of the most deadly days in the business and highlighting the need to improve industry safety culture in collections, post-collections and recycling Click Here.

Although adherence to OSHA Plans & Programs may not have been able to save the lives that were lost on June 13th, the importance of strictly following these plans and programs cannot be overstated.

What OSHA Plans?

Required OSHA written plans and programs may vary depending upon line of business and specific job hazards, but in the waste industry they typically include, but are not limited to, the following OSHA written plans and programs:

- Bloodborne Pathogens
- Fall Protection
- Hazard Communication Standard
- Lockout/Tagout (HECP)
- Powered Industrial Trucks
- Permit-Required Confined Spaces
- Respiratory Protection
- Heat Injury & Illness Prevention

Why do they matter?

- Employee Safety – Proper training, engagement and two-way communication with front line employees on OSHA mandated policies and procedures in the surest way to reduce the risk of associated incidents and injuries
- It’s the Law - Fines, penalties and business closure can be the result of not adhering to OSHA programs
- Risk Management – Reduce the risk of workers comp claims and legal actions

Employer Responsibilities

Employer responsibilities are typically spelled out in written plans and are available on OSHA’s website. Minimum responsibilities include, but are not limited to:

- Annual Review of Plans
- Initial training and annual training of employees
- Proper documentation and recordkeeping

Typical Examples of Pitfalls and Gaps in OSHA Programs

- GENERAL:
  - Failure to train new employees on all OSHA programs during onboarding process. Annual is not enough. Initial training and documentation are required for all new hires
  - Failure to retain proper documentation of training. Duration of employment plus 30 years is typical
- RESPIRATORY PROTECTION: Failure to train employees using “dust masks”. Dust masks are considered respirators (OSHA’s Respiratory Protection Standard – 1910.134) and require training and documentation
- BLOODBORNE PATHOGENS: Failure to offer Hepatitis B vaccination to all new employees, document vaccination schedule or statement by employee to decline vaccination
- LOCKOUT/TAGOUT: Failure to provide annual demo-back training for all affected employees on all equipment
- HAZCOM: Failure to update chemical inventory and SDS with all new chemicals being used at the site
- GENERAL: Failure to provide documented review of all OSHA plans annually and update as necessary
- POWERED INDUSTRIAL TRUCKS: Employees operating forklifts without current training certification

Properly maintaining OSHA safety plans and programs is a non-negotiable component of site safety. This requires time and resources to ensure that all new employees receive the necessary training, plans are reviewed and updated annually, and current employees receive annual training. The benefits of properly maintaining OSHA plans include engagement between site management and employees, ensuring management and front-line employees understand their roles and responsibilities, maintaining federal safety standards and driving a strong safety culture. The hazards of not properly maintaining OSHA plans include, fines, penalties, workers comp claims, legal action, injuries and death.

Please make sure your OSHA safety plans are in proper order and your employees have been properly trained