Written Programs Listing

Bloodborne Pathogens (BBP) (29CFR1910.1030)

This standard requires that precautions be taken to prevent the transmission of bloodborne pathogens. Viruses and bacteria can be found in blood, body fluids and other serum that, upon contact, may transmit diseases. Companies must determine if potential employee exposures exist and, if so, implement methods to control exposures. Such methods include universal precautions, such as latex gloves, and general sanitary measures. Other personal protective equipment, such as lab coats, coverall sleeves, etc., may also be utilized. In addition to good housekeeping, engineering and work practice controls may assist in controlling potential exposures. Some employees who work with pathogens may be required or offered hepatitis B vaccination at company expense. Any employee who has experienced any BBP exposure must have post evaluation and follow-up. All exposure and potential exposure records must be maintained, along with the procedures for evaluating the circumstances around exposure and potential exposure incidents. Employees must be trained and informed of any hazards they may encounter in the workplace.

Chemical Safety (29CFR1910.1450)

Similar to hazard communication, this standard provides for employees to be informed of and address the means necessary to protect themselves from chemical hazards in the workplace. Information and records, which include a list of chemicals in the workplace and the Material Safety Data Sheets for those chemicals, must be kept. Employers must keep records about any listed hazardous material used on site and which employees had exposure to these materials, including the dates of potential exposure. Any non-routine tasks that involve hazardous chemicals must be assessed and potential hazards must be protected against prior to the performance of the task. Any contractor must inform the worksite as to any hazardous chemicals they may be using or bringing onto the site. Additionally, they must be informed of any hazardous chemicals that they may encounter while on-site. If several employers work at one site or building, they must inform each other of the hazardous materials that are on-site and that any employee may encounter or be exposed to. Records must be kept for any hazardous chemicals or materials flowing through unlabeled pipes. Specifically, any product handling or storage of flammables, corrosives, or oxidizers must have written materials and safety precautions enforced for the process.

Confined Space Entry (29CFR1910.146)

Any confined spaces must be identified, including their location and hazards. A written program must be provided that includes the safe work procedures, entry and exit procedures, and rescue procedures in case of emergency. Any atmospheric monitoring performed must be included in the program, and records of all results maintained. Additionally, ventilation must be provided as appropriate to the confined space and any hazards therein. Employees entering, watching or providing rescue (as well as supervisory personnel) must be appropriately trained. A communication system must be maintained at all times between entrants and watchers.

Contractor Safety (29CFR1926 and additionally other standards)

Contractors must provide a written program that explains how they will comply with all applicable worksite regulations and facility safety requirements. This program includes items such as behavior while on site, fire protection considerations, hot work permitting and confined space entry, among other programs and regulations.

Control of Hazardous Energy - LOCKOUT/TAGOUT (LOTO) (29CFR1910.147)

All machinery and equipment which has the potential to release hazardous energy (electrical, pneumatic, hydraulic, thermal, etc.) during set-up, service or maintenance must be identified, and means provided to prevent or control the release. Lockout/tagout energy control procedures must be written and followed for each piece of machinery or equipment. Only trained employees are authorized to perform a LOTO. Procedures must detail the scope, purpose, rules and techniques used to control the release of hazardous energy. Techniques can include locks, tags, blocks, or other mean to prevent the machinery or equipment from activating accidentally. Inspections must be performed periodically to ensure that the procedures are being followed and that they meet the requirements of the regulation. Training must be provided to any employees who use LOTO and their supervisors. General awareness training must be provided to any employee who may encounter a LOTO device.

Electrical Safety (29CFR Subpart S)

Any employee who works on or around exposed electrical circuits must be trained and the company must have a written electrical safe work practices program, which includes training information and written work practice procedures. The program must also include information on the location of electrical hazards and the class of hazard (Class I, II or III) and the requirements for each hazard class location. The written program must contain, if applicable, information on Ground Fault Circuit Interrupters, where they are required and the safety practices for their use. Specific electrical design parameters should be explained, including where they have been implemented for worker or equipment protection. Information on specific PPE used during performance of tasks on or near electrical circuitry should also be included in the written program. Additionally, information on the care, use, handling and storage of any portable electrical equipment should be maintained, accessible at the work site and retained for the life of the equipment.

Emergency Preparedness (29CFR1910.38)

All companies must have a written emergency prepared and response plan that outlines the action to be taken in the event of foreseeable emergencies (i.e. fire, medical, explosion, chemical release, severe weather, workplace violence, bomb threat, etc.). The plan should address the actions that employees and supervision will take and include the design, maintenance and safeguards of exit routes; specific construction and operation of fire and alarm systems; emergency phone numbers; and the names, addresses and phone numbers of persons or agencies to contact or notify in the event of an emergency. Additionally, the presence of fire extinguishers and any specifics for their use (including personnel training) should be included in the written plan.

Ergonomics (best practices guidelines)

A written ergonomics plan is recommended when ergonomic hazards have been identified. The plan should outline the actions to be taken to minimize and control such injuries. Included in the written plan should be the process used to look for work-related musculoskeletal problems, actions to be taken, training provided, controls implemented and the health-care management of identified problem areas. The process for gathering and examining evidence of existing workplace musculoskeletal disorders and any proactive ergonomic activities should also be included.

General Safety and Health Policy and Rules (29CFR1910 "general duty clause")

There may be general safety rules that cover operations inside the company (including maintenance, sales, operations and other jobs) that do not fall under specific regulations, but are required under OSHA's general duty clause. It is the responsibility of employers to provide a safe workplace for their employees. Additionally, the company may subscribe to, or be required by contract to follow other industry provided guidance (i.e. aerospace, printing and graphics, ASCME, ANSI etc.). These internal company requirements should be documented within the operating procedures of the company.

Hearing Conservation (29CFR1910.95)

Where noise levels are of concern (>85 dBa averaged over an 8-hour workshift), a written hearing conservation program must be maintained. Actions and provisions to protect employees from noise induced hearing loss should be outlined. This formal program must include noise exposure measurement, identification of high exposure areas or tasks, audiometric testing frequency and results, an outline of the training program used, the engineering/administrative/PPE controls implemented and records relating to all these items.

Incident Investigation (best practices guidelines) and Recordkeeping (29CFR1910.1904)

A program for reporting, investigating and documenting workplace safety and health incidents, including near miss incidents, first aid incidents, recordable incidents and property or process losses should be maintained. Most industries with more than 10 employees are required to maintain records (OSHA 300 logs) of work-related injuries and illnesses. There are some industry sectors (medical, dental, most retail) that are exempt from this requirement. For a listing (by SIC code) of exempt industries, see the OSHA website at www.OSHA.gov.

Industrial Hygiene (29CFR1910.100X)

Communications of health hazards to employees is required. A formal hazard communication plan can be written separately or combined within a health and industrial hygiene program. A health and industrial hygiene program would include additional elements where applicable to the workplace. These elements include any exposure monitoring that is performed, including records about the type and schedule for such monitoring. The plan should describe authorizations for who is authorized to use any hazardous chemicals and any associated equipment. Assessments of any chemical or health-hazard exposures must be maintained and records kept for 30 years past the last day of employment. Specific process ventilation requirements (hoods, trunks or other specialized equipment) must be monitored and maintained, and monitoring and service records kept for the life of the ventilation equipment. Any complaints about indoor air quality, and associated monitoring results must be maintained for at least 7 years. Other applicable health and hygiene programs (such as Ergonomics, Ionizing and Non-Ionizing Radiation, Hearing Conservation, Toxic Gases, Biohazards, Personal Protective Equipment, Accident Investigation, Emergency Response, and Safety Inspection and Audits) can also be incorporated into one health and hygiene program.

Job Hazard Analysis (best practices guidelines)

Job safety/hazard analysis (JHA) programs identify hazards associated with individual job tasks. When JHAs are performed at the workplace, written evidence should be maintained on what was done, when, the process of performing the JHA and the recommendations for the reduction or elimination of injury or illness risks. Additionally, the measures taken to reduce or eliminate risk should be followed to completion and documented appropriately.

Laboratory Chemical Safety (29CFR1910.1450)

A chemical hygiene program addresses the safe use of chemicals in the laboratory including standard operating procedures for all chemical related activities performed in the laboratory.

Management of Change (best practices for most regulations – required for process safety)

In any good management system, changes must be accounted and properly administered for new or modified processes, equipment and procedures. New and/or altered equipment should undergo a review process to determine what, if any, hazards are presented by the new process or alterations to the existing process/equipment. Training (especially hazard communication training) frequently requires updating as new processes or changes to existing processes take place within the worksite.

Medical Management (29CFR1910.1003& 151)

A procedure must be in place that outlines the standard process for responding to internal and external medical emergencies at the facility and for transport of injured or ill employees. Whether or not your facility has a "first response" team, or relies on the community resources, the procedure should outline what is to be done in case of emergency. Additionally, some OSHA standards require professional medical personnel to monitor the health aspects of employees (i.e. hearing conservation, respiratory protection, etc.). Frequently, larger employers also have a professional medical staff person track a "return to work" process for employees who have been injured or are on short term disability, to monitor their progress in returning to the workplace.

Motor Vehicle Fleet Safety (29CFR1910.178)

For companies that own or lease their own motor vehicles (e.g., over the road vehicles, construction equipment and in-house powered industrial trucks), a written program needs to be in place that protects employees from injury and prevents motor vehicle incidents. Internal powered industrial trucks (PITs), such as forklifts, man-lifts, walk-behind powered trucks, etc. have specific training requirements. PITs may be required to be restricted from specific hazardous areas, and require specific maintenance.

Personal Protective Equipment (PPE) (29CFR Subpart I)

Where PPE use is required, there must be procedures for proper use, care, inspection, cleaning, storage and disposal of PPE. PPE includes hearing protection; head, eye and face protection; clothing to protect the body; foot protection; and respiratory protection. Respirators have their own specific requirements, listed below under respiratory protection.

Physical Hazard Safety (various 29CFR 1910 regulations – subject dependant)

Automated processes and processes that use hazardous chemicals or equipment should have written safety procedures. Such procedures should include preventive maintenance and inspection criteria. Examples of some equipment or processes to consider: powered industrial trucks exhaust ventilation, engineering controls, machine guarding, chains and slings, cranes and hoist, powered tools, boilers and steam equipment, pressure vessels, elevators, conveyors, working at height, and work in extreme temperatures.

Process Safety Management (29CFR1910.119)

Chemical processes that use highly hazardous chemicals or specifically regulated chemicals must have detailed, specific programs and procedures established that outline the safety and health requirements and control measures to prevent accidental releases and spills. Emergency procedures and contingencies for mitigating the effects of a chemical release to the land, air or water must be planned for and documented.

Radiation Safety (29CFR1910.96 & 97)

Where radiation sources are used, a written program is required. The program must have procedures to protect employees from exposure. ALARA (as low as reasonably achievable) guidance may require shielding, PPE, and administrative and work practice controls. Many states in the USA have very stringent regulations on the handling, use, storage and recordkeeping of radiation sources.

Respiratory Protection (29CFR1910.134)

Wherever respiratory protection equipment is used or required, a written program must be established to protect employees from hazards. Tasks and activities requiring the use of respirators must have safety analysis performed to control the hazards using engineering controls as the primary defense, secondly administrative controls to reduce or eliminate the hazard, and then respiratory PPE. The written program must outline the selection process; the required medical evaluation; fit testing procedures; the use, care, handling, cleaning and storage of respirators; air quality monitoring procedures; and training information. All the documented information and records must be kept for 30 years past employment. The respiratory program must be evaluated periodically to assure it is still needed, and is functioning adequately. Where employees are not required to use respirators, but choose to do so voluntarily, specific requirements must be met according to this OSHA standard.

Risk Assessment (various 29CFR 1910 regulations – subject dependant)

A process should be in place to assess potential risks to employee safety and health. The risk assessment process should identify measures, prioritize, and address these risks. A procedure on how to conduct Risk Assessments should include processes for Safety inspections, Job Hazard Analysis (JHA), New/Altered Equipment reviews, and discussions with employees.

Safety Inspections (various 29CFR 1910 regulations – subject dependant)

Processes for both general facility inspections and specific department or operating area self inspections should be in place. The company would develop inspection schedules and inspection checklists, define equipment and machinery requiring routine inspection to ensure safe use, and develop follow through procedures on how to correct the problem.

Warehousing, Shipping and Handling (29CFR.1910.178 +)

Requires a written program describing shipping, handling and material storage. The program would include setting of standards, training, vehicle maintenance, hazardous materials procedures, identification, selection, and use of appropriate materials storage techniques, etc.

Training, Awareness and Competency Verification (various 29CFR 1910 regulations – subject dependant)

A Safety and health training plan defines applicable employee populations, groups or classifications that require training. Testing procedures should always be a part of the training process. A schedule and procedure for training programs (and refresher training, where required) should be established to assure that regulatory required training is performed at the appropriate intervals. Those employees who are not required to be specifically trained in a detailed process, but who may be required to know that hazards are present (i.e. LOTO, Hazard Communication, etc.), must be included in the training process.

System Evaluation and Continuous Improvement Process (best practices guidelines)

A standard safety and health assessment defining specific topics and schedule for assessment, evaluation protocols, measurement tools and effective corrective action process should be implemented. This includes reviews of programs and procedures, the process for fostering involvement, an evaluation of the safety culture and continuous improvement efforts.