

CELLY SERVICES, INC.

Environmental, Health and Safety Services

DEALER ALERT

TO: Environmental Health and Safety (EHS) Coordinator
FROM: Sam Celly, MS JD CSP REA
SUBJECT: Top 10 Citations from OSHA
DATE: January 22, 2009

The Federal Occupational Health & Safety Administration (OSHA) is responsible for enacting and enforcing safety laws. In certain states such as California, the Cal-OSHA, a state agency enforces laws that are at least as stringent as Federal OSHA laws. The top 10 citations issued by Federal-OSHA in the 2008 fiscal year and how they are applicable to your dealership are as follows:

Scaffolding: Primarily applicable to construction industry.

Fall Protection: Falls, primarily from ladders and roofs, accounted for 184 fatalities (8% of all fatalities) in 2006. Any time a worker is at a height of 4 feet or more, the worker is at risk and needs to be protected.

Hazard Communication: Requires employers to provide a written Hazard Communication Program, label hazardous chemicals, provide a Material Safety Data Sheet for each chemical, and document employee training.

Lockout/Tagout: Specific procedures and practices to safeguard employees from the unexpected energization or startup of machinery and equipment. A written program, found in the CSI EHS binder helps dealers comply with the program. Employees working on automobiles must comply by isolating energy to the engine to prevent inadvertent movement during repair or service. Lockout kit including locks should be available as well.

Respiratory Protection: The bodyshop employees need specific training on policies (written) and practices involving the use of respirators during auto refinishing operations. Training on respiratory protection program, fit testing procedures, user seal check procedures, and respiratory cleaning procedures are mandatory, and so is the OSHA Respirator Medical Evaluation Questionnaire. Information for employees using respirators when not required under standard is also mandatory.

Electrical Standards: OSHA standards are designed to protect employees from electric shock, electrocution, fires and explosions. Failure to use flexible cords and cables properly was the most common citation. Please note that training for servicing *Hybrid* vehicles should be mandatory, and only trained workers allowed to work on these vehicles as they can provide a fatal shock to the unwary.

Powered Industrial Trucks (Forklifts): OSHA compliance requires training in specific activities—forklift operations, loading and unloading, and vehicle maintenance. Evaluating the operator every three years is also mandatory.

Ladders: See Fall Protection above.

Machines: Moving machine parts have the potential to cause severe workplace injuries, such as crushed fingers or hands, amputations, burns, or blindness. Safeguards, including anchoring fixed machinery, are essential for protecting workers from these preventable injuries. Any machine part, function, or process that may cause injury must be safeguarded. When the operation of a machine or accidental contact with the machine may injure the operator or others in the vicinity, the hazards must be eliminated or controlled. Moving parts in an automobile, grinders, and brake lathes are all subject to this regulation.

Electrical Systems Design: Not Applicable to auto dealerships!

The article was authored by Sam Celly of Celly Services, Inc. Sam has been helping automobile dealers comply with EPA & OSHA regulations since 1987. Send your comments to. sam@cellyservices.com.