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The 10 Most Frequently Cited Cal/OSHA Violations

Think safe. Act safe. Be safe.

Top 10 Countdown



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10. Work around electrical equipment
8 CCR 2340.16

- Average 28 California workers killed and 559 disabled annually due to electric shock.
- Cal/OSHA has electrical safety orders.
- Biggest issue is ensuring there is sufficient clearance to operate and service electrical equipment.
- Minimum clearance around electrical panels is 36 inches.

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9. Permits to Operate Air tanks 8 CCR 461

- Air tanks must have permits to operate (*misdemeanor for every day without a permit*)
- Permit must be posted under glass or in a weatherproof container secured to the unit or near the air tank and available at all times for inspection
- Permits for air tanks expire within 5 years from the date of installation/inspection (*check the tag for expiration date*)
- Exemptions:
 - Air tanks <1.5 cu. ft. with safety valves open at <150 psi or air tanks used for SCBA's < 1 cu ft.
 - Air tanks < 150 psi & < 25 cu. ft. have an indefinite permit if constructed, inspected and stamped per ASME Code

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8. Respiratory Protection

8 CCR 5144

- Primary goal is control of atmospheric contamination from harmful dusts, fogs, fumes, mists, gases/vapors, smokes, or sprays that could adversely affect human health.
- If engineering controls (i.e. local ventilation) are not feasible, 'appropriate' respirators shall be used.
- Protection of employee health is required by:
 - Establishing and maintaining a written Respiratory Protection Program including a medical clearance, fit test, and training.

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Respiratory Program Basic elements (cont.)

DSC's need to know:

1. Medical clearance at Occ. Health '**before**' a fit test (physiological burden) questionnaire
2. Fit tests (sizes & models),
3. Training (annual unless knowledge demonstration) on wearing, use, fit, maintenance, limits, inspection

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7. Failure to Report “Serious Injuries” 8 CCR 342(a)

- Employers are required to report “serious” injuries within eight hours.
- “Serious” is defined as
 - Hospitalization for > 24 hours;
 - Loss of a body part;
 - Permanent disfigurement.
- Fines are generally \$5,000.
- Safety Net #121 details the campus reporting procedure.

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6. Portable Fire Extinguishers

8 CCR 6151

- Fire extinguishers must be mounted and readily accessible by employees.
 - Only approved, inspected, and fully charged portable fire extinguishers are permitted.
 - Selection based on fire class (Class A-D): combustibles (wood, paper), flammable liquids, electrical, combustible metal.
- Class ABC extinguishers are suitable for most fire situations on campus.
- Campus Fire Department has a program in place to place, inspect, and maintain fire extinguishers.

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5. Lock Out /Tag Out (LOTO) 8 CCR 3314

- Lock Out/Tag Out (LOTO): Required to control energy when cleaning, repairing, servicing, setting-up, and adjusting machines and equipment. LOTO prevents:
 - Unexpected start up of equipment, or stored energy release (i.e., vessels under pressure or vacuum) which can injure employees.
 - Unexpected release or mixing of ingredients during maintenance.
- Locking or tagging out de-energizes or disengages moveable parts to prevent inadvertent movement. Locking/tagging out also blocks out pressurized vessels or releases of stored energy to prevent inadvertent release.

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Lock out /Tag out (Energy control)

- Lockout: Devices and procedures to isolate or secure machinery and equipment from mechanical, hydraulic, pneumatic, chemical, electrical, thermal or other hazardous energy sources.
 - Power sources de-energized ,disengaged, ore moveable parts mechanically blocked or locked out to prevent inadvertent movement, or release of stored energy
- Tagout: Placed on the controls of the power source of the machinery or equipment

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Lock out/Tag out

- Here are some examples of locks or tags that would be used to lock out or tag out equipment, energy sources, or reaction vessels.



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4. Hazard Communication

8 CCR 5194

- The HazCom regulation requires information and training on:
 - HazCom requirements;
 - Operations where hazardous substances are present;
 - Location of the list of hazardous substances, written HazCom program, and MSDSs;
 - Methods and observations to detect the presence or release of a hazardous substance;
 - Physical and health hazards and protective measures (i.e. PPE);
 - HazCom details (i.e. labeling system, MSDS interpretation);
 - Employee rights.
- The written Haz Com [template](#) is available for workplaces, not subject to the Laboratory Standard (non-lab locations).

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3. Construction IIPP
8 CCR 1509

- Cal/OSHA Construction Safety Orders require an IIPP, appropriate to the construction activities (not generally required at UC Davis).
 - Establish, implement and maintain an effective IIPP, as described in 8CCR3203 of the General Industry Safety Orders.
 - Adopt written Code of Safe Practices.
 - Conduct supervisory/employee meetings and discuss safety problems and accidents.
 - Conduct "toolbox" or "tailgate" safety meetings at least every 10 working days.

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2. Heat Illness

8 CCR 3395

- Applies to outdoor places of employment.
- Main requirements:
 - Access to drinking water: one quart per employee, per hour for the entire shift.
 - Shade (when $>85^{\circ}\text{F}$) will:
 - Accommodate 25% of the employees on the shift;
 - Be located as close to work areas as practical.
 - High-heat procedures (when $\geq 95^{\circ}\text{F}$) for agriculture, landscaping, & construction workers.
 - Cool Down: Employees allowed & encouraged take a cool-down & rest in the shade \geq five minutes .
- An initial training is required covering all required topics and a short refresher annually for both employees and supervisors to be able to recognize and manage signs and symptoms of heat illness.

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- Develop your [Heat Illness Prevention Procedures](#)
- Access [SafetyNet #123](#) – Heat Illness Prevention
- Use the EH&S training provided at the above link, or
- Also the Learning Management System (LMS) module on heat illness (<http://lms.ucdavis.edu>).

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**And the Number One most
cited Cal/OSHA Violation:**

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1. Injury Illness Prevention Program 8 CCR 3203

- Injury and Illness Prevention Program: UC Davis' [Step-by-Step Guide](#) for Department Safety Coordinators. The Guide includes a set of Appendices to aid development of the department IIPP.
- [SafetyNet #125](#) – Safety Management Program Guidelines for Department Safety Coordinators includes additional information and guidance for developing your safety program.

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**Cal/OSHA's
Top 25 Violations in 2010**

- 1. Injury Illness Prevention Program**
- 2. Heat Illness**
- 3. Construction IIPP**
- 4. Hazard Communication**
- 5. Lock out /Tag out (Energy control)**
- 6. Portable Fire Extinguishers**
- 7. Failure to Report**
- 8. Respiratory Protection**
- 9. Permits to Operate Air Tanks**
- 10. Work around electrical equipment**
11. Emergency Eyewash
12. Construction; First Aid
13. Forklift Operator Training
14. Compressed Gas and Air Cylinders
15. Flexible Electrical Cords
16. Installation of Electrical Equipment
17. Guarding; Belt & Pulley
18. Bloodborne Pathogens
19. Safe Practices; PPE
- 21 Electrical Equip. ID of Installation
- 22 Live loads
- 23 Process Safety Management
- 24 Forklifts; General Requirements
25. Ladders

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