**Instructor Guide**

**Introduction to OSHA Standards**

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Overview and Goals

All utility workers, gas, electric, or water all must follow the strictest safety guidelines.

The Occupational Safety and Health Administration (OSHA) was established to set safety standards in the workplace for all industries that are consistent throughout the US.

OSHA has in place standards, often times referred to as a “CFR” which is the acronym for the Code of Federal Regulations which businesses must adhere to ensure the health and safety of everyone in the workplace. Each standard is set in place and clear guidelines on its purpose and how it is applied. The standards are noted as citations, for example, 1910.2(f). Each number in the citation reflects the specific OSHA regulation that is being cited.

These standards and codes ensure that OSHA is able to inspect workplace environments to ensure the regulations are being met by employers that promote workplace safety.

However, if inspections reveal problems and/or challenges, the agency is in place to issue citations and penalties for OSHA violations

In this unit of work the instructor will:

* Highlight the concepts introduced in the online course.
* Reinforce the online materials with relevant industry updates and current business practices.

Upon completion of this unit of work, participants will be able to explain, the following concepts in relation to current OSHA guidelines and the practices in today’s workplace:

* Purpose of standards
* Standard definitions
* Types of standards
* Applicability of standards
* Types of inspections
* Inspection procedures
* Citations and penalties

**Note:** *Specific details and the outcomes of the participant activities will be determined by the lecture and discussion presented by the instructor, the regional guidelines and the current industry reports.*

Preparation – Facilitation Guidelines

Ensure the participants have completed the following online courses which focused on electrical workers, who like gas operators and installers are responsible for the safety of themselves, other personnel, as well as the public and the property.

* OS-0101 Introduction to OSHA Standards, including the pre-test and the 15 question course assessment

Conduct this training in a classroom setting, with a simulated lab environment using the local materials and tools for illustration, demonstration, and the hands-on workshop activities.

During the class introduction:

* Encourage discussion
* Discuss the importance of participation
* Explain that participants may work with a partner or in small groups to complete the activities. After each activity, the participants will be encouraged to present their findings for further discussion to the workshop.

Use a flipchart to capture key lessons learned from the group discussions, or to identify questions that will be answered in upcoming units of work or that require further research and discussion.

Reinforce the importance of damage prevention programs and the best practices and guidelines of the Compressed Gas Association (CGA), the Occupational Safety and Health Administration (OSHA), and the Federal Government.

Materials

Provide the following to each participant:

* A copy of the Activity Worksheet and Appendix 1
* Access to the Internet, as needed, for OSHA, federal, and industry resources/references supporting course related discussions, demonstrations, and hands-on activities.

**Note:** *These items, and any other materials used for demonstrations and participant activities, will be determined by the materials and tools used at the training facility.*

Schedule

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| --- | --- |
| **Time**  | **Topics for Discussion, Demonstrations, and Activities**  |
| **45 minutes**  | **Introduction** Explain that the Natural Gas industry adheres to the guidelines theOccupational Safety and Health Administration (OSHA) which requires that employers in the private sector:Maintain conditions or adopt practices to protect workers on the job Be familiar with and comply with standards applicable to their establishment Ensure that employees have and use personal protective equipment when required for safety and health* Review the history and key milestones of OSHA
* Review the following points about Occupational Safety and Health Administration (OSHA),

OSHA is responsible for enforcing the Occupational Safety and Health Act of 1970* The mission and purpose of OSHA mission is to ensure the safety and health of America's workers by
	+ Setting and enforcing standards
	+ Encouraging continual improvement in workplace safety and health

  |
| **120 minutes** | **Topic: Code of Federal Regulations Standards*** Discus the importance of unified rules and standards
* Emphasize that safety must constantly be monitored, and only through consistent standards is it possible to ensure workers in all industries are protected on the job.

Provide a brief overview of the following OSHA standards are set forth in Title 29 of the Code of Federal Regulations: * [General Industry - 29 CFR Part 1910](http://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1910)
* [Maritime - 29 CRF 1915-19](http://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=0&p_part_number=1915%2C1917%2C1918&v_description=Maritime+-+%28Standards+-+29+CFR%29)
* [Construction - 29 CFR Part 1926](http://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1926)

[Agriculture - 29 CFR Part 1928](http://www.osha.gov/pls/oshaweb/owastand.display_standard_group?p_toc_level=1&p_part_number=1928) * Encourage participants to review the details of the OSHA standards introduced in the online course, including the **categories which apply to worker safety, no matter what industry:**
* Medical and Exposure Record Access CFR 1910.1020
* Personal Protective Equipment CFR 1910 Subpart I
* Hazard Communication CFR 1910.1200
* Point out that the standards are continually being re-evaluated and that changes can be driven by OSHA as well as organizations and/or persons pursing safe work environments. For example:
* Updates to the Voluntary Protection Program (VPP) following an investigation of the increase in the number of deaths in the workplace. <http://www.publicintegrity.org/2013/07/12/12949/impact-osha-strengthens-rules-model-workplace-program>

**Discuss current changes:** * Encourage a discussion on worker safety based on timely news articles and discussions. See [Appendix 1.](#_Appendix_1)

Instruct participants to complete **Activity Worksheet #1**.  |
| **90 minutes** | **Topic: OSHA Inspections** * Instruct the participants to launch the OSHA Inspections Fact Sheet

<https://www.osha.gov/OshDoc/data_General_Facts/factsheet-inspections.pdf>* Review the fact sheet and point out that there are four types of inspections OSHA conducts:
* Unprogrammed inspections are those conducted in response to:
	+ A reported or recognized situation presenting "Imminent Danger" to the safety of employees
	+ Following a fatality or a catastrophic incident
	+ Investigations in response to employee complaints or referrals
* Unprogrammed-related inspections are those conducted when employers have more than one work site even though it was not directly affected by a complaint or accident reported to OSHA
* Programmed inspections are those which are scheduled to
	+ Ensure and promote safe working environments
	+ Determined by OSHA criteria (i.e., serious injury, frequency rates, etc.)
* Programmed-related inspections are those which occur at multi-employer sites that were not included in the programmed assignment
* Explain the detail of the inspection, depending on the situation, facility, and reason for the inspection determines if the inspection is classified as comprehensive or partial. Provide real-world examples of each.
* Discuss:
* The authority OSHA has during an inspection.
* OSHA’s requirements for notice
* How OSHA handles situations when the company does not allow the inspection
* How an inspection is handled covering the key points outlined in the online course:
	+ Commencing an inspection
	+ Protecting trade secrets according to ([§1903.9](http://mea.certpointsystems.com/REPOSITORY/COURSE/DOCS/%7BE5074F5F-7663-4CFE-9532-42069380BA39%7D.HTM)).
	+ Conducting the Inspection
	+ Inspection Representatives
	+ Consulting with Employees
	+ Concluding the inspection
	+ Addressing imminent danger
* Point out that no employee may be discharged or discriminated against for filing a complaint or participating in an investigation.
* Refer to real-world experiences during the inspection to encourage discussion among the participants
* Encourage a discussion on worker safety OSHA inspections based on timely news articles and discussions. See [Appendix 1.](#_Appendix_1)
 |
| **60 minutes** | **Penalties and Citations** **Discussion*** Review the key topics of the online course reinforcing the key points and outcomes of an inspection, including::
* What happens in an inspection results in a violation
* Define a violation
* Define a citation
	+ Explain the purpose of an informal review if a citation is not issued.
	+ Explain how citations are posted, including: content, location, and time.
	+ Explain the outcome if a violation is ignored and the employer fails to address the notice.
	+ Review penalties for violations.
	+ Explain how penalties are contested.
* Encourage a discussion on workplace violations and penalties based on timely news articles and discussions. See [Appendix 1.](#_Appendix_1)
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Boot Camp Activities

Working with a group, each group will be given an article to review from [Appendix 2](#_Appendix_2).

Read the articles and as a group to discuss key points about the article and present your findings to the workshop.

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| Activity Worksheet #1-OSHA Safety  |
| The importance and impact of safety in the work place can be further evaluated by reviewing the circumstances and outcomes of real-world safety failures and or concerns. |
| Identify the article assigned and/or accessed online for discussion |  |
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| What OSHA standards were impacted? How or why?Point to the appropriate CFR |  |
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| Lessons learned |  |
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| Key points for workshop discussion |  |
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# Appendix 1

Appendix 1–OSHA Discussion

**Article 1**

<http://www.pollstar.com/news_article.aspx?ID=805868>

OSHA Investigating Cirque Death

[Cirque du Soleil](http://www.pollstar.com/resultsArtist.aspx?ID=242424) is under investigation by the Occupational Safety and Health Administration following the recent death of a performer during the closing sequence of its “Ka” show in Las Vegas.

Sarah Guyard-Guillot reportedly fell 50 feet to her death during a battle scene, in which performers suspended by wires rappel along a wall.

“The entire Cirque du Soleil family is deeply saddened by the accidental death of Sarah (Sassoon) Guyard, artist on the production ‘Ka,’ that happened on Saturday, June 29, in Las Vegas,” the company said in a statement following the incident. “We have been working with the appropriate authorities and have offered our full cooperation.

Performances of ‘Ka’ will be canceled until further notice.” A Cirque representative told the [Las Vegas Review-Journal](http://www.reviewjournal.com/news/las-vegas/cirque-rep-says-final-ka-battle-scene-likely-be-cut) the scene will be temporarily removed from the show during the investigation.

“It is very likely that (the) Battle Scene will be removed during the OSHA investigation period,” which can last up to six months, Renee-Claude Menard said. She added it’s unlikely the show will resume before July 16.

**Article 2**

<http://www.postindependent.com/news/7249560-113/gas-osha-companies-fines>

3 firms get OSHA fines for spill near Parachute

GLENWOOD SPRINGS — Federal workplace-safety officials have accused three companies of violating federal law in association with the Parachute Creek spill of natural gas liquids discovered earlier this year, and have assessed fines totalling $27,234 to be paid by the three firms.

Penalty payments, according to the OSHA notification documents sent to the companies in late June, are due within 15 working days of receipt.

The three companies, Badger Daylighting Corp. of Rifle and Bargath LLC of Parachute, and WC Striegel, also of Parachute, have been involved in the cleanup of the spill, which was initially discovered in January but not reported until early March.

The leak is attributed to a blown pressure valve on a pipeline leading from a nearby Williams natural-gas processing plant. Williams officials at the time maintained that the amounts of spilled fluids was not enough to warrant being reporting to the Colorado Oil and Gas Conservation Commission (COGCC), the state’s oversight agency concerning oil and gas drilling activities.

But by March, the amount of spilled natural gas liquids had expanded and ultimately was estimated to amount to 10,000 gallons of hydrocarbons contaminating nearby soil, groundwater and — in small amounts — the waters of Parachute Creek itself.

In early April, four workers complained to the Post Independent that they had been working at the plume site for Badger Daylighting, a contractor hired for the cleanup, without the proper protective gear and breathing apparatus.

The workers declined to be identified for fear of losing their jobs.

A Post Independent reporter called OSHA in Denver on March 29, asking if the agency was looking into the situation and the workers’ claims, and was told no such investigation had been started.

But by April 2, OSHA official Juan Rodriguez told the Post Independent that an inquiry had begun. The citations and proposed fines are the culmination of that inquiry, Rodriguez confirmed on Tuesday.

The three companies are accused of not having proper training programs in place for employees working at the site of the release and other aspects of the cleanup, of not properly evaluating the hazards present at the site, of not properly informing employees of the health hazards involved, of failing to adequately monitor the air at the site to avoid worker exposure to toxic elements, or of failing to ensure that the workers had received the required safety training.

The notifications specifically mention employees being exposed to benzene, a known human carcinogen linked to such diseases as leukemia, bone-marrow failure and birth defects, and other “volatile organic compounds” commonly associated with gas and oil drilling activities.

Efforts to contact officials at Williams, Bargath, Badger Daylighting and WC Striegel on Tuesday were not successful.

Rodriguez was unable to confirm whether any of the penalty payments had been received by OSHA, or whether the companies had contacted OSHA to schedule what are known as “informal conferences” to discuss the matters involved.

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<http://www.postindependent.com/news/7249560-113/gas-osha-companies-fines>

Appendix 2–OSHA Discussion Articles for Workshop

Note: This table will be updated by instructor to reflect articles which address current events, OSHA updates, and regional reports.

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| --- | --- | --- |
| **Article Name/Author**  | **Date** | **Link**  |
| Fracking industry cleanup workers exposed to benzene in Colorado, feds allege By John Uptom  |  | http://grist.org/news/fracking-industry-cleanup-workers-exposed-to-benzene-in-colorado-feds-allege/?utm\_source=syndication&utm\_medium=rss&utm\_campaign=feed |
| OSHA Proposes Fines for Parachute Leak by KREX News Roomby John Dias | July 9, 2013 | http://www.krextv.com/news/around-the-region/OSHA-Proposes-Fines-for-Parachute-Leak--214847751.html |
| Environmental Enterprises cited for 22 violations | June, 2013  | <https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=24249> https://www.osha.gov/ooc/citations/EEI\_Safety\_citations.pdf |
| OSHA Fines Construction Company $7,600 in Worker’s Death **by** Alicia Agent and [Jocelyne Pruna](http://5newsonline.com/author/kfsmjocelynepruna/), | July 10, 2013 | <http://5newsonline.com/2013/07/10/osha-fines-construction-company-7600-in-workers-death/> |
| OSHA cites Florida underground utility company  | June 18, 2013 | <https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=NEWS_RELEASES&p_id=24207>  |
| OSHA probes collapse of Sandy-damaged home in NJ- San Fransisco Chronicle OSHA investigating Little Egg house collapse that injured 3 workers | July 12, 2013 | <http://www.sfgate.com/news/article/OSHA-probes-collapse-of-Sandy-damaged-home-in-NJ-4661389.php> |
| July 12, 2013 | <http://www.app.com/article/20130711/NJNEWS/307110153/OSHA-investigating-Little-Egg-house-collapse-injured-3-workers> |
| Workers can file complaints with CAL/OSHA anonymously  |  | <http://www.kget.com/news/local/story/Workers-can-file-complaints-with-CAL-OSHA/Gq2EnwXP1kmSw6xYLodQ8Q.cspx>  |
| OSHA reports significant number of injuries caused by crane accidents by Theodore Babbiitt | July 11, 2013 | <http://www.palmbeachpost.com/news/news/crime-law/osha-reports-significant-number-injuries-caused-cr/nYmZJ/> |
| OSHA Update: OSHA Penalties Doubled in 2011Still Too Low, Says Head of OSHA by Rod Smith and Pat Miller |  | <http://www.sah.com/NewsAndEvents/View/A084D212-5056-9125-630B9B005AE36594/> |
| Types of OSHA Violations by John DeMerceau, Demand Media Houston Chronicle  |  | <http://work.chron.com/types-osha-violations-10693.html> |