



How to Prepare for PEOSH Inspections

& OSHA Hazard
Assessment

SOMERSET COUNTY JOINT INSURANCE FUND

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Conducting a Hazard assessment

New Jersey is a State Plan State

- State Plans are OSHA-approved workplace safety and health programs operated by individual states or U.S. territories.
- There are currently 22 State Plans covering both private sector and state and local government workers, and seven State Plans covering only state and local government workers.
- State Plans are partially funded & monitored by OSHA and must be at least as effective as OSHA in protecting workers and in preventing work-related injuries, illnesses and deaths.

Inspection Types

- Programmed
- Complaint
- Accident
- Referral

PEOSH
Inspection

PEOSH Inspections vs. PEOSH Consultations

Reporting Period: 1/1/2023 through 3/31/2023

Inspections	
General Inspections	33
Complaint	13
Accident	1
Referral	2
Follow-up	32
Total Inspections	81
Serious Violations	231
Other-than-Serious Violations	134
Total Violations	365

2nd Quarter: 130 Safety Visits

- Initial Visits: 77
- Training & Education Visits: 37
- Follow-Up Visits: 16
- Strategic Plan Emphasis (Fire Service, DPW, Water/Sewer, and Transportation Support): 63

Q2 Most Frequently Identified Serious Hazards

- 1910.157 – Portable fire extinguishers (18)
- 1910.303 – Electrical General Requirements (17)
- 1910.38 – Emergency Action Plans (10)
- 1910.147 – Control of Hazardous Energy (Lockout/Tagout) (9)
- 1910.37 – Exit routes (6 - tie)
- 1910.215 – Abrasive Wheel Machinery (6 - tie)

Programmed Inspection

- Driven by 5 Year Strategic Plan and 300 Log Data.
- OSHA's Site-Specific Targeting (SST) Inspection Plan.
- Employers may request to be removed from the programmed inspection list by having an inspection within the last five fiscal years, or participation in a voluntary compliance program.



The Complaint Form

You can get an OSHA complaint form, called an OSHA-7, by contacting the nearest OSHA area office. You may also obtain one from a local committee on occupational safety and health (COSH group).

The information that you provide on the complaint form will probably be the only description of the specific hazard that the inspector will see before the inspection. The inspector will base his or her research and inspection plan on this information.

If management insists that the inspector has a warrant to enter the workplace, OSHA will present your complaint to a judge to justify the warrant. The warrant may only allow an inspection of the particular hazards alleged by your complaint, so be specific.

Filling Out the Complaint Form

Below we discuss how to answer the questions on the complaint form. The bold text reproduces the exact language from the complaint form.

The undersigned (check one)

☐ **Employee**

☐ **Representative of Employees**

☐ **Other (specify) _____**

Believes that a violation at the following place of employment of an occupational safety or health standard exists which is a job safety or health hazard.

"Employee" means an employee of the workplace being complained about or anyone working near this workplace.

"Representative of Employees" usually means a union officer, staff member, or steward. If you are a union representative, you can indicate your title and the name of your union at the end of the complaint.

Employer's Name _____

Employer's Address _____

Give the employer's name and address as completely as possible. Also, indicate any parent company's name. The inspector may check whether there have been past inspections or ones at other company locations. Be precise about the address, since the inspector has to know how to find your workplace without contacting your employer.

Complaint

- An unprogrammed inspection is an inspection which is conducted without any prior knowledge of the employer.
- These visits are often the result of an employee complaint about a hazardous working condition.
- Unprogrammed inspections are designed to address imminent dangers, fatalities/catastrophes, employee complaints, referrals and follow-up or monitoring inspections.



2019-2023 Strategic Plan (Current National & Local)

- **Empower and protect workers:**
\$2.2 billion – an increase of \$397 million over the 2021 enacted level – in the department’s worker protection agencies. This will enable the department to conduct the enforcement and regulatory work needed to ensure workers’ wages and benefits are protected and improve workplace health and safety.
- **National Emphasis Program**
 - Heat (4/8/22)
 - Combustible Dust(1/30/23)
 - Amputations
 - Highway Work Zone Safety
 - Temporary Workers
 - Trenching

Local Emphasis Program:

- Nursing Homes Residential Care

(Although the OSHA National Emphasis Plan (NEP) for Nursing Homes expired as of April 2015, PEOSH will continue to inspect nursing homes in accordance with the June 25, 2015 OSHA Inspection Guidance for Inpatient Healthcare Settings.)

- New Jersey Department of Transportation Maintenance Facilities
- Noise
- Asbestos
- Firefighter – Emergency Responder Preparedness



2019-2023 Strategic Plan

- **OSHA News Releases – April 2023**

- 04/24/2023 - OSHA National News Release - Department of Labor cites Dollar Tree Inc. for obstructing exits, unsafely storing materials at Rhode Island stores in Providence, Pawtucket
- 04/21/2023 - OSHA News Brief - US Department of Labor, Brasfield & Gorrie Construction to promote safety at Alabama construction site
- 04/20/2023 - OSHA National News Release - US Department of Labor to honor workers whose jobs claimed their lives, recommit to protecting workers as nation marks Workers Memorial Day
- 04/20/2023 - OSHA National News Release - Dollar General again found exposing employees to fire, entrapment hazards, after federal workplace safety inspection at Orlando-area store
- 04/20/2023 - OSHA News Brief - US Department of Labor partners with Moss & Associates LLC to promote workplace safety during Pasco County Jail project in Central Florida
- 04/20/2023 - OSHA Trade Release - US Department of Labor announces new members of Maritime Advisory Committee on Occupational Safety and Health
- 04/20/2023 - Region 4 OSHA News Release - Department of Labor finds City of Delray Beach retaliated against inspector for reporting cross-contamination between tap water, reclaimed sewage
- 04/19/2023 - OSHA Trade Release - US Department of Labor announces launch of 'Beat the Heat' contest.



Agenda

- Complaint or Programmed
- Presentation of Credentials & Request Supervisor & Employee Representative
- Opening Conference
- Walkthrough
- Closing Conference
- Notice of Violation (NOV)

PEOSH
Inspection
Process

Compliant - Unannounced

- OSHA will give employers advance notice of an inspection only under four conditions:
 - In cases of apparent imminent danger, to try to get management to fix the condition immediately.
 - When the inspection must be after regular business hours or when special preparations are necessary.
 - If management and worker representatives are not likely to be on-site unless they have advance notice.
 - In other circumstances where the OSHA Area Director thinks a more complete inspection would result, such as in a fatality investigation.

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Credentials

- The inspector will present their credentials (usually a badge) and request senior representation and employee representative (Union if applicable).
- They will announce the type of inspection.

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Credentials

- Tell the Inspector that it is your workplace policy to contact your management prior to starting the inspection: Have the CSHO wait while you are making phone calls.
- Note, at this point, you have not given the Inspector permission to inspect your workplace, so he or she should wait until the proper managers arrive.
- There is no set time the Inspector is required to wait.
- Keeping the wait as short as possible will begin to build a relationship that will be important throughout the inspection.

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Credentials

- What should be done at this point?
 - Direct to conference room
 - 300 Logs (5 yrs.)
 - Hazard Communication Plan & know where other H&S Plans reside.
- Other Considerations:
 - Who should participate in the Walkaround
 - Should you deny Inspection?
 - I do not recommend you deny permission to conduct the inspection. Although it is your right, it can have negative impacts on the process. Discussing this ahead of time with all decision makers and assigning what manager will be giving the permission in the preplanning stage is a must.

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Opening Conference

- The opening conference is supposed to be kept as brief as possible, but make sure that the inspection will cover the hazards in the complaint.
- If either participant (complainant or Mgmt.) objects to a joint opening conference, the inspector will conduct separate opening conferences for labor and management.
- During the opening conference, the inspector will determine whether employees of other employers are also working at the site. If the inspection affects them, the inspection may include other employee representatives. (part time or contract)
- The inspector usually checks the OSHA required Log and Summary of Occupational Injuries and Illnesses and may examine other OSHA required records.

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Walkthrough

- Records Review
- Walk Around Inspection
- Interviews

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Records Review

- It is common for the inspector to review documents during the inspection. This often occurs during or right after the opening conference. If a document review is requested, it is suggested to only allow the inspector to review your workplace safety and health program at the time of the inspection. Other records should be sent to the inspector after upper management approves.
- Do not volunteer to give or let the inspector view any safety inspection reports made by your safety department, insurance carrier, etc., other than those reports required by OSHA (such as scaffolding inspection forms). This includes not giving or letting the inspector look at any such reports that have been made on behalf of a subcontractor's activities.

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Walkthrough

Keep these steps in mind during the walk-around:

- Have a company representative accompany the inspector & take photographs of everything the inspector photographs. If the equipment, work area, etc., can be photographed from a more favorable position (different angle, greater distance, etc.), photograph it from the different position.
- Do not allow any employee to perform demonstrations for the inspector. For example, if a truck is idle and the inspector asks you or an employee to operate it so he or she can see if the horn or backup alarm is working, refuse to do it. Allow the compliance officer to see the work only as it normally is done.
- At all times. Never leave him or her to have free and unlimited access to your workplace.
- Control the inspection: Treat the inspector as you would a guest in your house; he/she is there with permission and will be expected to follow all instructions given to him/her and will be required to conduct the inspection in such a manner that it does not disrupt the scheduled work.
- Remember, it is your workplace, not OSHA's. The inspector is to be treated as any other visitor.

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Walkthrough

- Do not volunteer any information. The inspector is trained to obtain admissions from companies. Be careful answering questions. When in doubt, ask him or her to restate the question. Do not admit to a violation. State the facts only, not your opinion. Do not lie to the CSHO at any time.
- Do not issue orders, such as “clean up the trash,” during the inspection to have conditions corrected that have not been noticed by the inspector.
- Make sure you fully understand everything the inspector does or comments on. If you do not understand everything he or she says and does, ask questions. Insist on having time to record all facts, even if the inspection is slowed down.

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Walkthrough - Interviews

- During the course of the inspection, the inspector may ask you some questions. Although this is not an official interview, please treat it as such. The inspector also may conduct an official interview with you. When either of these occur, these rules should be followed:
 1. Tell the truth.
 2. Make sure you understand the question.
 3. Just answer the question, nothing else.
 4. Answer based on your knowledge only. Don't guess or speculate.

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Walkthrough - Interviews

- OSHA does not have a right to privately interview a member of management.
- Managers always can have other managers and representatives present when they are being interviewed.
- That rule changes with employees.
- OSHA has the right to interview employees privately.
- When this occurs, do not obstruct. The employee also should follow the same rules for being interviewed.
- Rule #1 is the most important — tell the truth. Never lie to a State employee conducting an investigation.

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Closing Conference

- Upon conclusion of the inspection, a closing conference will be held. Typically, this occurs on the same day of the inspection. However, if the inspector still needs to gather information, he or she may delay the closing conference.
- Ensure all representatives are present and follow these steps:

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Closing Conference

- Take notes of everything discussed and record what documents were distributed.
- Make sure that no questions you have concerning the inspection go unanswered. If the inspector feels that violations exist at your workplace, find out exactly why he/she feels that way.
- Tell the CSHO that you are noting every potential violation that he or she advises may exist so there will be no dispute at a later conference or hearing.
- Hand the list back and ask if that is everything. Ask what other items may exist. If the inspector is unsure or does not list any others, explain that you are noting that no additional items were included in response to your questions.
- Finally, don't give any estimates of abatement time needed to correct any alleged violations.

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What's Next?

- The inspector will go back to the office and complete the citation if one is being issued. This can take anywhere from a couple days to a few months. It depends on the workload the inspector has on his or her plate. The inspector will review the details of the case with his or her supervisor as well to ensure citations are based on the facts. These citations will then come in the mail to your office (Highest Ranking Representative).
- The deadline to issue citations is six months after the inspection. OSHA has quite a while to get these to you, but when you receive them, do not delay. Employers only have 15 working days to contest or attend an Informal conference or just pay the fine. Don't miss that deadline as you lose all your rights.
- You should base your plan of action based on the options and timelines which will be presented next.

PEOSH Inspection Process



Notice of Violation or Order To Comply

- The enclosed Order to Comply describes violations of the Public Employees' Occupational Safety and Health Act. The violations referred to in this Order must be abated by the dates listed unless within 15 working days (excluding weekends and State holidays) from the issuance of this Order to Comply you mail a notice of intent to contest to the Department of Labor and Workforce Development at the address shown above.
- Please refer to the enclosed Public Employees' Occupational Safety and Health Act which outlines your rights and responsibilities, and which should be read in conjunction with this form. The Order will become the Final Order if no notice of intent to contest is filed as provided for in the Act or, if contested, the Order is affirmed by the Review Commission or a court.

PEOSH
Inspection
Process



Notice of Violation or Order To Comply

Posting

- The law requires that a copy of this Notice and the Order to Comply be posted immediately in a prominent place at or near the location of each violation cited herein, or, if it is not practicable because of the nature of the employer's operations, where it will be readily observable by all affected employees. This Order must remain posted until each violation cited herein has been abated, or for 15 working days (excluding weekends and State holidays), whichever is longer.

Informal Conference

- An informal conference is not required. However, if you wish to have such a conference you may request one with the Office of Public Employees' Occupational Safety and Health during the 15 working day contest period by contacting the office shown above. During such an informal conference you may present any evidence or views which you believe would support an adjustment to the citation(s).

PEOSH
Inspection
Process



Notice of Violation or Order To Comply

Notice of Unsafe or Unhealthful Working Conditions Page 4 of 6 NJ OSHA -2
(Rev.03/02)

New Jersey Department of Labor and Workforce Development Office of Public
Employees' Occupational Safety and Health

NOTICE TO EMPLOYEES

An informal conference has been scheduled with OPEOSH to discuss the Notice of
Unsafe or Unhealthy Working Conditions (Notice) issued on XXXXXXXXXX. The
conference will be held at the OPEOSH office located at: 1 John Fitch Way, 3rd
Floor, P.O. Box 386, Trenton, NJ 08625 on _____ at _____.

Employees and/or representatives of employees have a right to attend an informal
conference.

PEOSH
Inspection
Process



Notice of Violation or Order To Comply

- If you are considering a request for an informal conference to discuss any issues related to the Order to Comply, a written letter of intent to contest must be submitted to the Office of Public Employees' Occupational Safety and Health within 15 working days of issuance of the Order. The contest period is not interrupted by a request for an informal conference.
- If you decide to request an informal conference, the Office of Public Employees' Occupational Safety and Health will schedule the conference, which will be conducted within 30 days of receipt of the request.
- Employees and/or employee representatives will be notified of their right to attend the conference. PEOSH will arrange for representatives of the Department of Health to conduct conferences requested from Orders to Comply issued pursuant to a certification from the Commissioner of Health that an employer violation has been determined to exist within the Department of Health jurisdiction under the Act.
- Any and all supporting documentation of existing conditions as well as any abatement steps taken thus far must be brought to the conference. If conditions warrant, an informal settlement agreement, which amicably resolves this matter without litigation or contest may be entered into.

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Inspection
Process



Notice of Violation or Order To Comply

- You have the right to contest this Order to Comply. You may contest all citation items or only individual items. You may also contest abatement dates with out contesting the underlying violations.
- Unless you inform the Office of Public Employees' Occupational Safety and Health in writing that you intend to contest the citation(s) and/or abatement dates within 15 working days of the issuance of this Order to Comply, then this Order to Comply shall become a final order.

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Notice of Violation or Order To Comply

Penalties

- The Act provides that if the time for compliance with an order of the Commissioner elapses, and the employer has not made a good faith effort to comply, the Commissioner shall impose a civil administrative penalty of up to \$7,000 per day for each violation of a provision of N.J.S.A. 34:6A 25 et seq., or of a standard or regulation promulgated under that act, or of an order to comply. Any employer who willfully or repeatedly violates the requirements of this section or any standard, rule, order or regulation promulgated under that act shall be assessed a civil administrative penalty of up to \$70,000 for each violation. Penalties imposed under this section may be recovered with costs in a civil action commenced by the Commissioner by a summary proceeding under "the penalty enforcement law" (N.J.S.A. 2A:58 1 et seq.) in the Superior Court or a municipal court, either of which shall have jurisdiction to enforce "the penalty enforcement law" in connection with this act. If the violation is of a continuing nature, each day during which it continues after the date given for compliance in accordance with the order of the Commissioner shall constitute an additional separate and distinct offense. If this penalty remains unpaid for more than 30 days, this order shall be recorded on the Judgment docket of the Superior Court.

Request to Delay Issuance of Penalty Order to Comply

- When an employer submits a request to delay the issuance of an Order to Comply establishing penalties, the employer shall submit such written request 10 calendar days prior to the abatement date(s) established in the original Order to Comply.

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Notice of Violation or Order To Comply

Notification of Corrective Action

- For each violation which you do not contest, you are required by 29 CFR 1903.19 to submit an Abatement Certification to the New Jersey Department of Health, PEOSH Program. This certification must be sent by you prior to the abatement date indicated on the citation. For Willful and Repeat violations, documents (example: photos, copies of receipts, training records, etc.) demonstrating that abatement is complete must accompany the certification. Where the citation is classified as Serious and the citation states that abatement documentation is required, documents such as those described above are required to be submitted along with the abatement certificate. If the citation indicates that the violation was corrected during the inspection, no abatement certification is required for that item.

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Notice of Violation or Order To Comply

Notice to Employees

- The law gives an employee or an employee representative the opportunity to object to any abatement date set for a violation if he/she believes the date to be unreasonable. The contest must be mailed to the Office of Public Employees' Occupational Safety and Health at the address shown above and postmarked within 15 working days (excluding weekends and State holidays) of the issuance of this Order to Comply.

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NOV–OTC Between Closing Conference and letter

- Discuss NOV-OTC with Management
- Assess what is discussed at closing conference in terms of:
 - Budget
 - Timing
- Decide if you can meet deadlines or will require additional time
- Decide if you will request an informal
- Start corrections & documentation ahead of NOV-OTC

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Job Hazard Analysis (JHA)

- A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur.
- It focuses on the relationship between the worker, the task, the tools, and the work environment.
- Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.

A job hazard analysis is a technique that focuses on job tasks as a way to identify hazards before they occur. It focuses on the relationship between the worker, the task, the tools, and the work environment. Ideally, after you identify uncontrolled hazards, you will take steps to eliminate or reduce them to an acceptable risk level.

JHA Form Methodology

REQUIREMENTS AND RECOMMENDATIONS:

- The OSHA standard requires a written certification that a hazard assessment has been performed, but does not require that the hazard assessment itself be written. Members are encouraged to use written JHAs so that the hazards, control measures, and PPE requirements can be communicated to employees consistently.
- Before assigning employees to a new task and whenever the methods, tools, or materials involved in a job are changed, a JHA should be performed to determine what controls and/or PPE is needed to perform the task safely. Whenever an employee is injured while performing a task, the JHA for the task should be reviewed to confirm that the required controls and/ or PPE were being used, and determine whether any changes are needed.
- A written statement of the Personal Protective Equipment requirements that apply in a given situation should be prepared and distributed to all affected employees.
- A Job Hazard Assessment (JHA) is one technique for performing the Hazard Assessment. To perform a JHA, the job is first broken down into a series of discrete steps. Each step is analyzed to identify hazards, determine what engineering controls are feasible, and what PPE is needed to protect employees. This is a useful technique for repetitive jobs that are performed the same way day after day, such as in a manufacturing setting.

What jobs are appropriate for a job hazard analysis?

- A job hazard analysis can be conducted on many jobs in your workplace.
- Priority should go to the following types of jobs:
 - Jobs with the highest injury or illness rates;
 - Jobs with the potential to cause severe or disabling injuries or illness, even if there is no history of previous accidents;
 - Jobs in which one simple human error could lead to a severe accident or injury;
 - Jobs that are new to your operation or have undergone changes in processes and procedures; and
 - Jobs complex enough to require written instructions.

List, rank, and set priorities for hazardous jobs

- List jobs with hazards that present unacceptable risks.
- Based on those most likely to occur and with the most Severe consequences.
- These jobs should be your first priority for analysis.

Outline the steps or tasks

- Nearly every job can be broken down into job tasks or steps.
- When beginning job hazard analysis, watch the employee perform the job and list each step as the worker takes it.
- Be sure to record enough information to describe each job action without getting overly detailed.
- Avoid making the breakdown of steps so detailed that it becomes unnecessarily.
- Get input from workers who have performed the same job.
- Review the job steps with the employee to make sure you have not omitted something.
- Point out that you are evaluating the job itself, not the employee's job performance.
- Include the employee in all phases of the analysis—from reviewing the job steps, procedures to discussing uncontrolled hazards and recommended solutions.
- It may be helpful to photograph or videotape the worker performing the job. These visual records can be handy references when doing a more detailed analysis of the work.

How do I identify workplace hazards?

- What can go wrong?
- What are the consequences?
- How could it arise?
- What are other contributing factors?
- How likely is it that the hazard will occur?



Good hazard scenarios describe:

- Where it is happening (environment)
- Who or what it is happening to (exposure)
- What precipitates the hazard (trigger)
- The outcome that would occur should it happen (consequence)
- Any other contributing factors?

To perform a job hazard analysis, you would ask:

- **What can go wrong?** The worker's hand could come into contact with a rotating object that "catches" it and pulls it into the machine.
- **What are the consequences?** The worker could receive a severe injury and lose fingers and hands.
- **How could it happen?** The accident could happen as a result of the worker trying to clear a snag during operations or as part of a maintenance activity while the pulley is operating. Obviously, this hazard scenario could not occur if the pulley is not rotating.
- **What are other contributing factors?** This hazard occurs very quickly. It does not give the worker much opportunity to recover or prevent it once his hand comes into contact with the pulley. This is an important factor, because it helps you determine the severity and likelihood of an accident when selecting appropriate hazard controls.
- Unfortunately, experience has shown that training is not very effective in hazard control when triggering events happen quickly because humans can react only so quickly.

How likely is it that the hazard will occur?

- This determination requires some judgment.
- If there have been “near-misses” or actual cases, then the likelihood of a recurrence would be considered high.
- What are some near misses you have experienced?

JHA Form

[illegible]

JHA Form Methodology

INTRODUCTION:

- To establish an effective procedure for identifying job hazards to institute controls to protect employees from illness or injury and prevent property damage. Job Hazard Assessment (JHA) is a process used to study work procedures, evaluate behavior, identify hazards, and determine how to control or eliminate unsafe conditions or acts. JHA's can also be used as a training guide for new employees.
- This program applies to employees who may be exposed to risk of injury or known health hazards based on past accident experience, medical surveillance, material handling concerns, etc.

REGULATORY REFERENCES: 29 CFR 1910.132(d & f) Personal Protective Equipment – Hazard Assessment and Equipment Selection.

JHA Form Methodology *(continued)*

SUMMARY OF REGULATORY REQUIREMENTS:

- The employer is responsible for analyzing the risks associated with the jobs that employees perform and determining how those hazards will be controlled. The employer is required to certify, in writing, that the hazard assessment has been performed whenever employees are required to use Personal Protective Equipment (PPE).
- The employer is responsible for implementing department specific policies and procedures for conducting Job Hazard Assessment (JHA). Further, the employer should ensure that appropriate education and training, are provided to department employees to properly comply with this program.
- Also see on Respiratory Protection, Fall Protection and Noise Exposure.

JHA Form Methodology *(continued)*

- Steps for conducting a Job Hazard Assessment:
 - Identify the job position that is to be analyzed and separate the job position into individual tasks.
 - Select a specific task for JHA based on analysis criteria.
 - Break the task down into sequential steps.
 - Evaluate the steps and identify specific hazards.
 - Propose a control for each hazard and document.

JHA Form Methodology *(continued)*

Potential Hazard Identification:

- Hazards in the workplace can originate from a variety of sources including: chemicals, explosions, electrical, ergonomics, excavations, falls, fire/heat, mechanical, vibration, noise, radiation, struck by, struck against, temperature extremes, weather, visibility, etc. The evaluation should:
 - Base initial hazard identification on past accidents and what could occur.
 - Determine the causes of the accidents.
 - Determine how accidents could occur.
 - Identify the contributing factors to the accidents.

JHA Form Methodology *(continued)*

Hazard Control Measures:

Successful management of identified hazards in the workplace involves the incorporation of controls into each task. The following controls can be used individually or in combination but, to achieve the greatest measure of success should be utilized in the order presented:

- Engineering Controls involve the elimination or minimization of the hazards in the work environment through designing or modifying the facility, equipment, or processes to remove the hazard or by substituting processes, equipment, materials or other factors to lessen the hazard.
- Administrative Controls involve the use of written operating procedures that monitor and limit the amount of exposure an employee has to a hazard and can include the use of alarms, labels, signs, warnings, personnel, and training to maintain the controls.
- Personal Protective Equipment involves the use of devices that employees utilize individually to safeguard themselves from exposure to identified hazards when the use of engineering and administrative controls do not provide complete protection.

JHA Form Methodology *(continued)*

Documentation:

- PEOSH requires a written certification that a Job Hazard Assessment has been performed.
- A written Job Hazard Assessment for employees is strongly recommended.

Training:

- PEOSH, Personal Protective Equipment (PPE)

Elimination

Substitution

Engineering
Controls

Administrative
Controls

PPE

Risk, Safety and Security
Must Involve ALL Employees



Any Questions?

The End