



2016 SAFETY AND HEALTH BULLETIN

TO: All SMACNA Members **SB: 16-08**

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SUBJECT: **OSHA Standards Revisions**

OSHA is proposing several changes and clarifications to their construction, recordkeeping, maritime and general industry standards. The changes are part of OSHA's ongoing Standards Improvement Project. Most of the changes proposed are for construction standards. Here are proposed revisions that will impact the construction industry including the subpart and standard numbers that will be impacted.

Reporting Job-Related Hearing Loss

Occupational Injuries and Illnesses Recording and Reporting Standards (29 CFR Part 1904)
1904.10 – Recording criteria for cases involving occupational hearing loss.

The revisions would clarify the criteria for determining whether a hearing loss was work-related or not. Hearing loss should be considered work related if any event or exposure caused or contributed in any way, big or small, to the loss of hearing or aggravated a preexisting hearing loss. Employers are required to keep records if hearing loss is work-related.

911 Emergency Services at Worksites

1926 Subpart D – Occupational Health and Environmental Controls
1926.50 – Medical services and first aid.

Employers are required to prominently post telephone numbers for ambulances, doctors and hospitals at worksites in areas where 911 emergency services are not available. Requirements for posting phone numbers at jobsites were written in 1979, before emergency phone access to "911" communication was widely available. With Enhanced 911 (E911) dispatchers are automatically provided the caller's location information. In areas where automatic location capabilities aren't available (including many cell phones), employers are required to post latitude and longitude coordinates of the worksite or other location information.

Collection of Social Security Numbers

OSHA is proposing to remove all requirements to include an employee's social security number (SSN) on exposure monitoring, medical surveillance and other records from all general industry, construction and maritime standards. The rising threat of identity theft is the primary reason for the change to help safeguard and protect the privacy of employees.

Permissible Exposure Limits (PELs)

1926 Subpart D – Occupational Health and Environmental Controls

1926.55 – Gases, vapors, fumes, dusts and mists.

OSHA is making several language revisions to the PEL standards to make it clear that it is mandatory that an employee's exposure not exceed the exposure limit for a given substance. Other changes proposed will clean up some of the language of the standard such as changing all references of "threshold limit values" to "permissible exposure limits."

Personal Protective Equipment (PPE)

1926 Subpart E – Personal Protective and Life Saving Equipment

1926.95 – Criteria for personal protective equipment.

For personal protective equipment (PPE) to adequately protect workers, it must fit properly. The construction standard doesn't require that PPE fit workers in the same way the general industry standard does. The proposed revisions would require employers to select and provide PPE that properly fits their workers.

Lanyard/Lifeline Break Strength

1926 Subpart E – Personal Protective and Life Saving Equipment

1926.104 – Safety belts, lifelines and lanyards.

The changes proposed would revise the minimum breaking strength of lanyards and vertical lifelines to 5,000 lbs. which would be in line with the requirements in 1926.502 – Fall protection systems criteria and practices. This is based on 5,000 lbs. being equivalent to the force generated by a 250 pound employee experiencing a force 10 times the force of gravity, plus a two-fold margin of safety. The current 5,400-lb. breaking strength requirement was based on ¾-in. manila ropes used for body-belt systems available when the rule was first written, not on forces generated from falls.

Excavation Hazards

1926 Subpart P – Excavations

1926.651 – Specific Excavation Requirements.

The current regulations require employers to protect workers from loose rock and soil and excavated or other materials in or around excavations that could pose a hazard. The changes proposed would clarify that a hazard is presumed to exist any time loose rock or soil, excavated or other materials or equipment are beside a trench and must be protected against. It also relieves OSHA from having to demonstrate that a hazard exists and better protect workers from cave-ins.

For further information on OSHA regulations, go to the [OSHA webpage for Small Businesses](#). This webpage offers a variety of excellent compliance assistance information directed towards small businesses.

For additional information or guidance, contact Mike McCullion, SMACNA's director of market sectors and safety at mmccullion@smacna.org or 703-995-4027.