

OSHA

A Welcome Visitor

by Marisa Hirsch

Northeast Panel & Truss opened their doors to OSHA and became SHARP.



Ed Jerome, area director of OSHA, presented SHARP certificate to Mike Hogancamp, Northeast Panel & Truss Safety Committee chairman.

A visit from OSHA is not something that most companies in any industry look forward to. It almost certainly means stress, and in some cases can lead to hefty fines. Therefore, the idea of inviting OSHA to visit can seem like a strange concept that may equal inviting trouble. But that's just what the people at Northeast Panel & Truss, LLC decided to do, and they're glad they did.

The company, operating in Kingston, NY, chose to open its doors and invite OSHA in. And not just once or twice, but as many times as it took to accomplish its goal. That magic number turned out to be seven—seven visits from OSHA. And the goal was to become a certified SHARP (Safety & Health Achievement Recognition Program) site. Northeast Panel & Truss achieved this goal in May 2006, and celebrated with an awards ceremony, a barbecue and t-shirts for all employees.

SHARP is a free program that, according to OSHA's website (www.osha.gov), "recognizes small employers who operate an exemplary safety and health management system." In the state of New York alone, there are over 70 SHARP sites from many different industries, all of whom opened their doors to OSHA.

Committing & Participating

Ron Coons, safety director at Northeast Panel & Truss, says being part of this program can bring many benefits to companies. (One of these is that a site is exempt from normal OSHA inspections while its SHARP certification is valid.) However, deciding to become a SHARP participant is a commitment, and everyone needs to be on board for it to work.

In May 2004, before Coons was working at Northeast, the company received notice from OSHA that its injury rates were high and it was going to be placed on the Site Specific Targeting (SST) List. "That list identifies a little bit more than 900 of the most unsafe companies in the state of New York to work for, and 13,000 of the most dangerous companies in the United States," said Coons.

When Coons began working at Northeast in June 2004, Bruce Hutchins, president, was ready to commit himself and his company to being the best at safety. In fact, from Northeast's beginning, Hutchins always intended to focus on safety.

Steps to SHARP Certification

According to the SHARP Program's web page (www.osha.gov/dcsp/smallbusiness/sharp.html), the following are the basic steps to becoming a SHARP site:

- Request a consultation visit that involves a complete hazard identification survey;
- Involve employees in the consultation process;
- Correct all hazards identified by the consultant;
- Implement and maintain a safety and health management system that, at a minimum, addresses OSHA's 1989 Safety and Health Program Management Guidelines;
- Lower your company's Lost-Workday Injury and Illness rate (LWDII) and Total Recordable Case Rate (TRCR) below the national average; and
- Agree to notify your state Consultation Project Office prior to making any changes in the working conditions or introducing new hazards into the workplace.

"I made it very clear to all employees...that there were not to be any exceptions made to safety rule violations, including loss of production time," he said. "It took time; a few people lost their jobs. We had to change a culture. I still knew that I couldn't do it all myself, and was at a bit of a loss on how to manage a program actively while managing the overall operation."

Coons' resume landed on Hutchins' desk right around this time, and he was quickly hired. Having been previously involved in getting a lumber retail site SHARP-certified, Coons was ready to help get Northeast Panel & Truss to the same level. Hutchins and Coons discussed the SHARP program, and got right to work at improving Northeast's safety practices. They formed a safety committee and a safety and health program, and amped up employee safety training.

Being on the SST List meant that Northeast Panel & Truss knew an OSHA inspection was coming sometime soon. Sure enough, OSHA showed up unannounced in September 2004 and spent an entire day at the facility. They found four violations, three of which Northeast fixed right away. However, the fourth required some parts being ordered (new flame arrestors and other parts for their torch kit) and the development of a welding program to train employees on the proper use of such equipment. This violation resulted in one citation, but no fine because they had been working so hard at safety improvement.

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Northeast Panel & Truss shop employees on the day of the SHARP certification awards ceremony and barbecue.

After this initial inspection, a formal report is sent to the recently-inspected company. Coons said this report references every OSHA regulation that was found to be in violation. Included with it is a document called Form 33, which lists 58 items divided into seven categories. Examples of categories are Safety and Health Training, Employee Participation, and Hazard Anticipation and Detection.

Specific items under the seven categories involve such things as emergency preparedness, preventative maintenance tactics, whether or not workplace injury data are effectively analyzed, and whether or not feasible engineering controls are in place. For each of the 58 items, companies receive a one, two or three as a ranking, with three being the best.

Coons said that in order to be a SHARP site, a company must get at least a two for each of the 58 items. After their first consultation visit, Northeast received several ones and a couple of twos. Their safety committee then used the evaluation to identify and work on what areas needed help in their facility. One thing they were required to work on was establishing an effective procedure for tracking hazard correction. Coons chose to address this by creating a database to track all reported hazards. The system tracks areas hazards were found, the types of hazards they were, and whether or not they were fixed.

"From this, I can query areas of the shop that show the highest frequency of hazards," said Coons. "I can pinpoint what areas have the poorest housekeeping and so on.... I can also tell who reports the most hazards and perhaps reward them accordingly."

After each subsequent visit from OSHA, Northeast received another form updating them on their progress until they met their goal of at least a two in each category.

Coons said that through this consultation process and reaching the required rankings, other steps to becoming SHARP follow naturally—such as lowering Lost-Workday Injury and Illness rates (LWDII) and Total Recordable Case Rates (TRCR) to below the national averages.

During the last inspection before Northeast achieved certification, the inspectors spent most of the time interviewing employees to test their knowledge of the SHARP program and therefore gauging their participation in the program. This is because it's considered very important to have all employees involved in the program, and not just management.

"[The U.S. Department of Labor] doesn't want it to be management-run," said Coons. "SHARP has to start with the employees."

Coons said this worked well at Northeast Panel & Truss. The employees enjoyed being part of the process and program, and worked hard to reach the goal of certification. Production in the plant would stop one or two times a week and they would work on employee training. If there was a minor incident, everyone would gather wherever it occurred and discuss how to prevent it from happening again. Employees trained one another, reported hazards, did inspections and contributed to suggestion boxes.

"For the guys to become part of something special...I think it was important to them," said Coons. "It really worked out well."

Benefits Abound

Things like lowered accident rates and higher employee morale are only a couple of the benefits that Coons believes come from working with OSHA and SHARP. In fact, Coons said he can't name anything negative about participating in the program. "There are really no drawbacks," he said. "It's a great process. The people that you meet, the things that you learn.... It's very good even if somebody doesn't want to be a SHARP site. But why wouldn't you want to? It's free and a good all-around thing."

Hutchins said he was willing to work with OSHA because doing so was good motivation to make the company safer.

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"We basically got a pat on the back and it was turned over to the New York state consultation service to follow up and make sure we got the last problem fixed," said Coons. When the consultation service came in to do so, Northeast stated its interest in becoming a SHARP site.

Steps to SHARP

SHARP's web page (www.osha.gov/dcsp/smallbusiness/sharp.html) states that the first step to becoming a certified site is to request a consultation visit, which includes a hazard identification survey. Employee participation in the visit is part of the requirement.

Coons said that Northeast's onsite consultation was the same as a regular OSHA inspection. Their inspector began by spending a few hours reviewing the company's programs, looking at documentation like injury logs and accident reports, and asking questions about things such as best practices. Next, there was a walk-through of the entire facility, including break rooms and offices. During the walk-through, the inspector noted violations and made recommendations. The last part of the consultation was the closing conference, which is when the inspector reviews everything he noted throughout the day. Coons said he used this time to make his own list of areas in need of improvement, drawn from the inspector's observations.

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"Like a looming deadline, it helps motivate you," he said. "And if you achieve the rating, OSHA actually stays away and concentrates where they should—on the unsafe work places."

By inviting state consultation offices in, companies can receive help in developing programs and organizing training on such things as accident investigation and job safety analysis. Additionally, Coons said that working with state offices means not being inspected by federal OSHA. He said this is because OSHA resources are already being used, and the

appeared the other way."

There is an official way that companies aiming for SHARP can prevent federal OSHA inspections. It's called an inspection deferral, and participants can request one lasting up to 18 months from their Consultation Project Manager. Coons said Northeast Panel & Truss got one about eight months after they began working towards SHARP. He said the deferral was a letter from the state that the company posted. The letter said that Northeast Panel & Truss was in pursuit of becoming a New York state SHARP site, was working with

Northeast Panel & Truss employees attend a barbecue celebrating the company's SHARP certification in May 2006. Each employee received a t-shirt to commemorate the company's SHARP certification.



consensus is that a company working with the state does not need to take up federal OSHA's time as well.

Obtaining Inspection Deferral

However, representatives from another company requesting not to be named said they were inspected by federal OSHA at two different locations—at the same time they were in contact with state consultation offices. They were not working toward SHARP certification, but had invited state OSHA in to evaluate their situation and were working on improvements. While the company found the evaluation to be mostly helpful, they also found it unsettling that federal inspections occurred within a year after the state consultations took place.

"When [state inspectors] came in and presented their scope of work, they were very adamant about having no contact, no communication whatsoever with [federal OSHA]," the company's safety director said. "Except for, as it played out, it just

the state, and that there was no need to inspect the facility at that time.

Federal OSHA did approach Northeast for an inspection about two months after they began working with the state—before they had the inspection deferral. "In November of 2004, federal OSHA came back for the second time," Coons said. "When they came in, they turned around and left because we were already working with the state."

Officially Certified

In May 2006, Northeast Panel & Truss became an official SHARP site. As is customary, both the state and federal OSHA recognized the achievement in an awards ceremony. Northeast chose to combine this with a barbecue, a couple hours off in the afternoon for everyone and t-shirts all around. The company also received, as do all SHARP sites, a one-year exemption from OSHA's scheduled inspections.

When Northeast's one year is up in May 2007, the company will have its recertification visit. This time, they will have to receive all threes on their evaluation form. If they do, they

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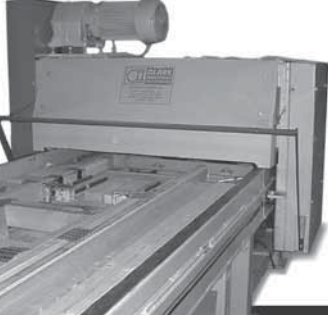


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"Inspiration, motivation, and a sense of empowerment can be obtained from participation in the SHARP program. Turnover and injuries will decrease, and production, morale, and trust in the company will increase."



Northeast Panel & Truss receives SHARP certification. Left to right: Ron Coons, Northeast's safety director; John McCarthy, loss control consultant at NY State Insurance Fund; Mike Hogancamp, Northeast Panel & Truss employee and Safety Committee chairman; Tonya Ross, industrial hygienist and SHARP coordinator at New York State Department of Labor; Ed Jerome, area director of OSHA; and Bruce Hutchins, president of Northeast Panel & Truss.

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may follow guidelines to request renewal for either one or two years.

"The idea behind it is that you're always looking to make continuous improvement," Coons said. "A lot of SHARP companies become [certified] and kind of sit back and relax. But this is a way to keep pushing and making your programs better."

Coons said he thinks it's in component manufacturers' best interest to get involved with SHARP. He acknowledged that some people believe inviting Department of Labor in sets their companies up for trouble, but he said he thinks that is a misconception.

"The benefits of establishing a relationship with them (Department of Labor workers) in the way of SHARP and consultation is a lot better than waiting for them to knock on your door for an inspection," said Coons. "Or worse, responding to your company to investigate a fatality."

Participating in SHARP and other similar programs certainly takes commitment and effort, and there are some things that Northeast Panel & Truss is still actively working on—such as integrating safety into their production process. That was and is the most difficult part for them, but they continue to compromise and make it a priority. And, for Northeast Panel & Truss, difficulties like that are worth being involved in SHARP.

"Inspiration, motivation, and a sense of empowerment can be obtained from participation in the SHARP program," said Coons. "Turnover and injuries will decrease, and production, morale, and trust in the company will increase." **SBC**

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