

New Jersey Public Employees' Occupational Safety And Health (NJ PEOSH)



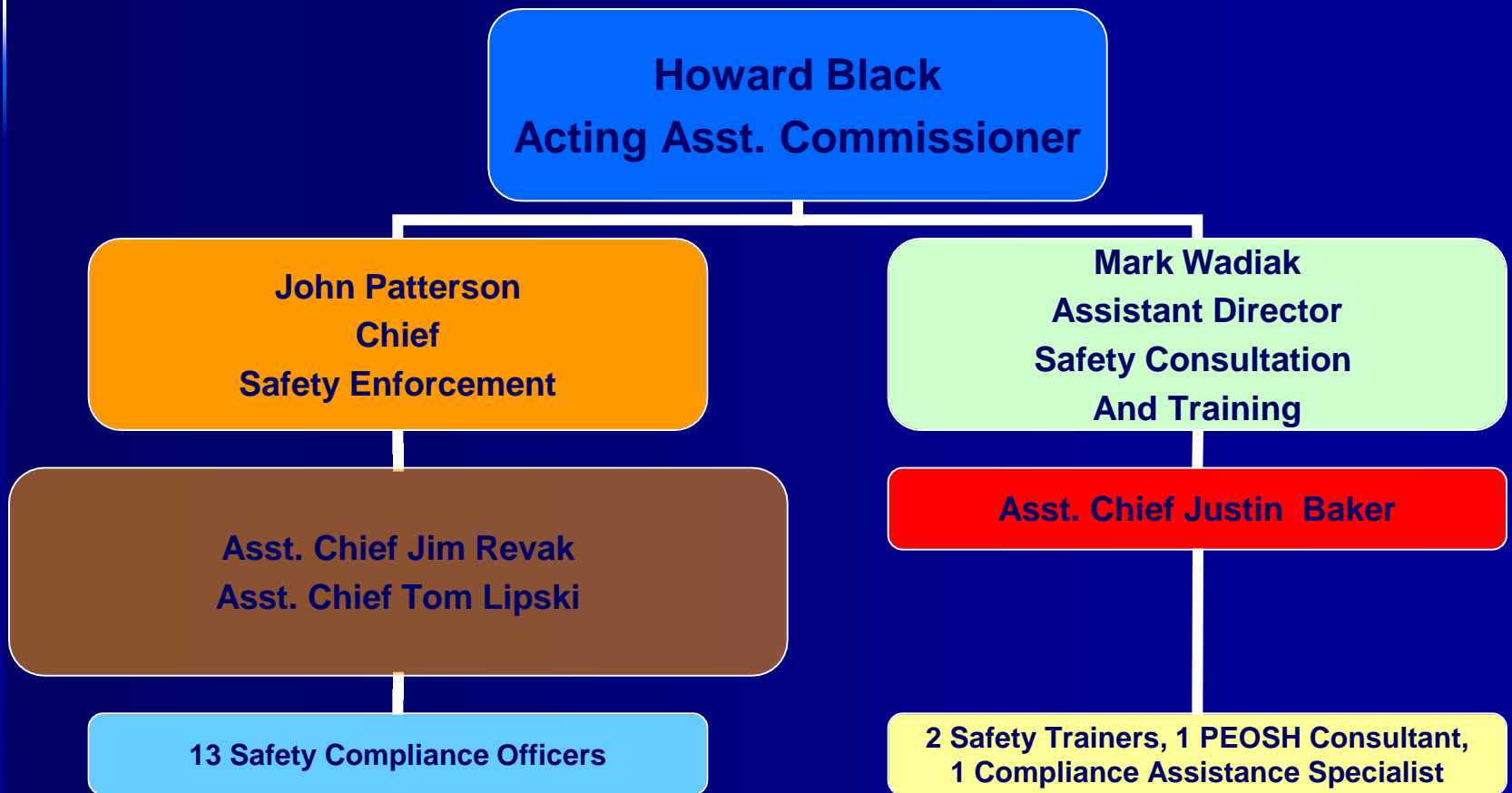
“Fire Service Update”

Presenter:

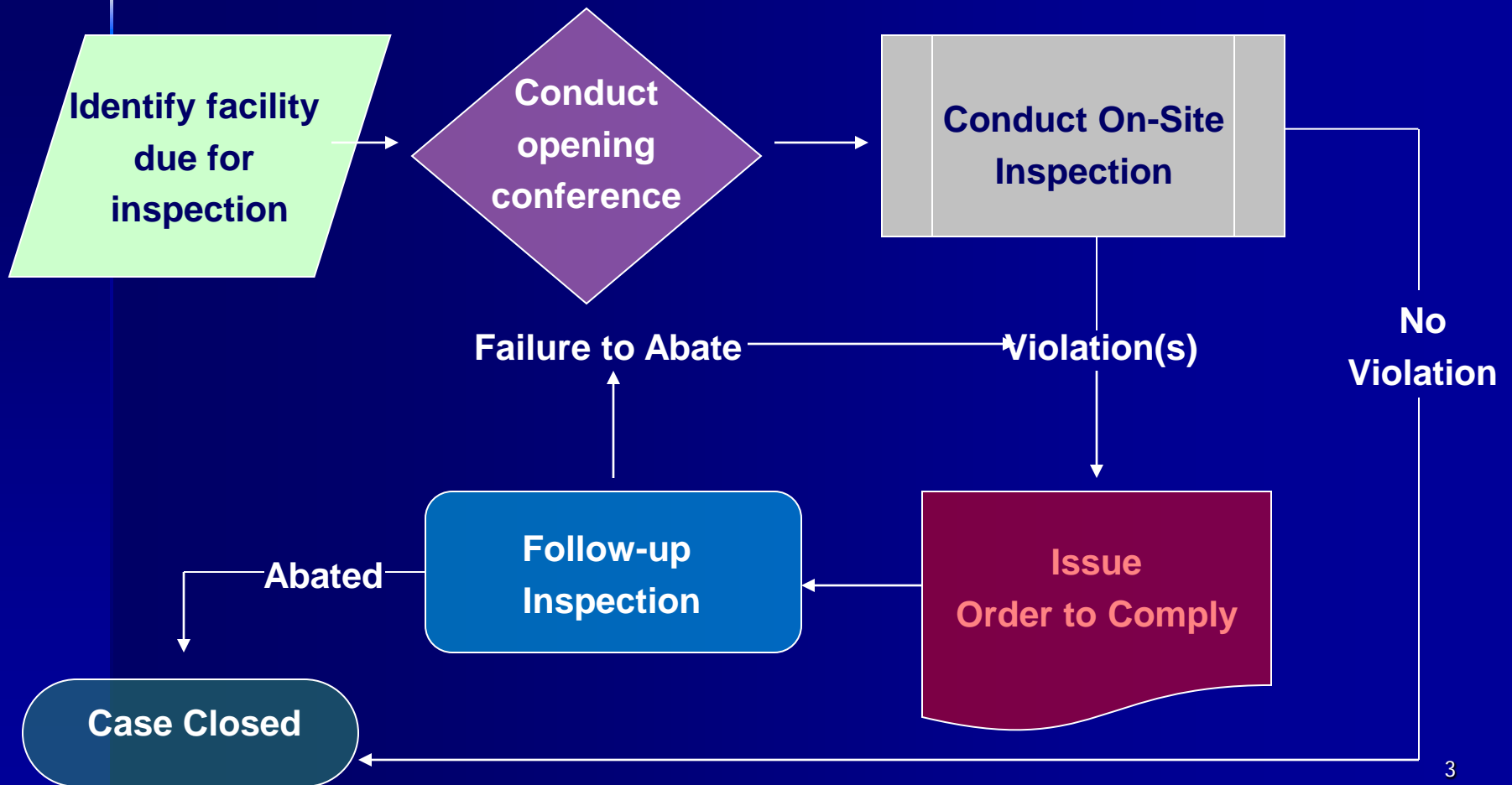
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Assistant Chief PEOSH Consultation and Training

PEOSH Organization NJLWD



PEOSH Enforcement Process



Changes In Standards/Procedures

- PEOSH has established Local Fire Protection as a strategic initiative under the 50% OSHA Grant.
 - Greater focus on enforcement
 - Greater focus on outreach/cooperative services
- Revised Field Operations Manual (FOM) - PEOSH has adopted the Federal OSHA penalty structure so there will no longer be a 90% reduction.

Types of Violations

- Willful – fines of up to \$70,000 (X 10)
 - Minimum of \$5,000
 - Intentional disregard or plain in-difference
- Repeat
 - For <250 multiplied by a factor of 2/5/10
 - For >250 multiplied by a factor of 5/10
- Serious – fines of up to \$7,000
- Other Than Serious
- Regulatory
- De Minimus

Penalties

- PEOSH is not a first sanction fining organization except in the case of Willful and Repeat violations.
- The vast majority of PEOSH fines are caused by "Failure to Abate".
- Per Diem penalty assessed until the hazard is corrected or 30 days – whichever comes first.

Penalties

- Penalties are adjusted using the following factors:
 - Company size (up to 60%)
 - Good faith (up to 35%)
 - History (up to 10%)

Confined Space Rescue Alert



Requirements for Employers Who Designate
Outside Rescue & Emergency Service, As
Their Permit-Required Confined Space
Rescue Team



Public Employee Safety & Health Bulletin #31

ATTENTION: All Public Employers

October 2010

National Statistics Indicate That Two-Thirds of All
Confined Space Fatalities Involve Rescue and Emergency
Services Team Members Who Attempt Confined Rescue
Without Proper Training, Equipment And Fail To Follow
Rescue Team Requirements As Contained In 29CFR
1910.146 (k).

Recent investigations conducted by the Office of Public Employees Occupational Safety and Health, (OPEOSH) revealed that many public employers who rely on outside emergency rescue services as part of their permit required confined space entry procedures, are in violation of the requirements as specified under 29CFR 1910.146 . The health and safety of confined space entrants is compromised when procedures as outlined under 29CFR 1910.146 (k) (rescue and emergency services) are not followed.

In Order To Prevent Serious Injury Or Death Related To Confined Space Emergency Rescue Operations, Employers Are Required To Comply with 29CFR1910.146(d)(9) "Develop And Implement Procedures For Summoning Rescue and Emergency Services , For Rescuing Entrants From Permit Spaces, For Providing For Necessary Emergency Services To Rescued Employees And For Preventing Unauthorized Personnel From Attempting Rescue".

Employers who name first responders as their rescue team as part of their permit required confined space rescue teams must follow all procedures as outlined under 29CFR 1910.146 (k) Rescue and emergency services:

29CFR 1910.146(k)(1)(i) Evaluate a prospective rescuer's ability to respond to a rescue summons in a timely manner, considering the hazard(s) identified;

Note to paragraph (k)(1)(i): What will be considered timely will vary according to the specific hazards involved in each entry. For example, 29CFR 1910.134, Respiratory Protection, requires that employers provide a standby person or persons capable of immediate action to rescue employee(s) wearing respiratory protection while in work areas defined as Immediately Dangerous to Life and Health (IDLH) atmospheres.

29CFR 1910.146(k)(1)(ii) Evaluate a prospective rescue service's ability, in terms of proficiency with rescue-related tasks and equipment, to function appropriately while rescuing entrants from the particular permit space or types of permit spaces identified;

Confined Space Rescue Alert

29CFR 1910.146(k)(1)(iii) *Select a rescue team or service from those evaluated that:*

29CFR 1910.146(k)(1)(iii)(A) *Has the capability to reach the victim(s) within a time frame that is appropriate for the permit space hazard(s) identified;*

29CFR 1910.146(k)(1)(iii)(B) *Is equipped for and proficient in performing the needed rescue services;*

29CFR 1910.146(k)(1)(iv) *Inform each rescue team or service of the hazards they may confront when called on to perform rescue at the site; and*

29CFR 1910.146(k)(1)(v) *Provide the rescue team or service selected with access to all permit spaces from which rescue may be necessary so that the rescue service can develop appropriate rescue plans and practice rescue operations.*

Note to paragraph (k)(1): Non-mandatory Appendix F contains examples of criteria which employers can use in evaluating prospective rescuers as required by paragraph (k)(1) of this section.

Note: 29CFR 1910.146 Non Mandatory Appendix F: A.I. *At a minimum, if an off-site rescue service is being considered, the employer must contact the service to plan and coordinate the evaluations required by the standard. Merely posting the service's number or planning to rely on the 911 emergency phone number to obtain these services at the time of a permit space emergency would not comply with paragraph (k)(1) of 29CFR 1910.146.*

Notice to In-House and Off-Site Rescue/Emergency Services!

Employers who have designated their own employees to perform permit required rescues and emergency services must comply with all the requirements outlined under 29CFR 1910.146(k)(2) and (k)(3). In addition to the requirement for employers to provide personal protective equipment and training, the employer must also ensure those employees practice making permit space rescues at least every 12 months by means of simulated rescue operations in which they remove dummies, manikins, or actual persons from the actual permit spaces or from representative permit spaces [Ref: 29CFR1910.146(k)(2)(iv)].

Additional guidance is provided in 29CFR 1910.146 Non Mandatory Appendix F, *Rescue team or rescue service evaluation criteria.*

The 29CFR 1910.146, *Permit-required confined spaces standard* can be viewed in its entirety at the Federal OSHA website:

http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&tp_id=9797

SAFE WORK PRACTICES SAVE LIVES

Additional public employee safety and health information can be obtained from our web sites:

http://lwd.dol.state.nj.us/labor/lsse/safetyhealth_index.html

<http://www.state.nj.us/health/eoh/peoshweb/>

MSA SCBA Alert



MSA SCBA Equipped with AirFrame™
Carrier & Harness Assembly



Public Employee
Safety & Health Bulletin
ATTENTION: All Public Employers
October 2006

This notice is to warn of the potential for injuries resulting from a separation of the MSA AirFrame Carrier & Harness Assembly with the optional Swiveling Lumbar Swivel Support Bracket. Please ensure that the warning and the safe practices below are shared with all fire service, law enforcement and industrial personnel who use this equipment.

WARNING

Cracks may develop in the swiveling lumbar support bracket causing a sudden separation of the bracket from the AirFrame Carrier & Harness

The Office of Public Employees Occupational Safety and Health has received reports regarding the cracking of the optional Swiveling Lumbar Support Bracket where it connects to the AirFrame Carrier and Harness Assembly of the MSA FireHawk® Air mask. The cracks occurred on the support bracket, at the attachment nut. Should a crack develop, the nut can pull through the bracket and cause the lumbar support bracket to separate from the carrier / harness assembly. If this failure occurs while dragging, the unit is pulled up toward the victims head and the chest strap can injure the victim's neck.

The models in question are the MSA FireHawk, BlackHawk® and AirHawk® Air Masks with the AirFrame Carrier & Harness Assembly. Those having units with the optional Swiveling Lumbar Support Bracket should contact MSA at 1-877-MSA-3473 for recommendations regarding inspection of these units after each use and monthly. If cracks are found remove the SCBA from service and notify your local MSA Certified Service Center and PEOSH at 609.292.3749.

MSA issued an Important Safety Reminder Dated May 27, 2005 concerning the pulling/lifting capacity of the Air Frame Carrier and Harness

The reminder states: "*The AirFrame Carrier and Harness Assembly has an attachment point at the top of the Carrier and Harness Assembly. The AirFrame's centrally located carabineer attachment point was designed for rescue rope attachment to horizontally drag or pull a firefighter to safety and is rated for 1000 pounds load. The side handles were designed for carrying the Air Mask and for use when donning and doffing the apparatus. These were tested for dragging purposes as well, with a rating of 400 pounds for each handle (or 800 pounds combined).*

It is important to note that these points of attachment have not been designed for vertical raising or lowering, but only for horizontal dragging or pulling a firefighter to safety. The same is true for any of the MSA Carrier / Harness Assemblies (Black Rhino and Vulcan) with regard to the raising or lowering of a firefighter".

An updated Safety Reminder concerning this issue is being prepared by MSA and will be out shortly.

MSA SCBA Alert

Swivel Lumbar Support



Crack in Swivel Lumbar Support



Some Cracks Are Very Apparent



Hairline Cracks Are Hard To See



Crack From Pulling & Dragging



Crack At Lumbar Support Caused Separation Failure



New Jersey Standards for Firefighters

- Covered under N.J.A.C. 12:100 Subchapter 10
 - Organizational Structure
 - Education and Training
 - Personnel
 - Turnout Gear
 - Harnesses / Hardware
 - Pass Devices
 - Hearing Protection
 - Filling Air Cylinders
 - Fire Apparatus Operations
 - Maintenance of Fire Fighting Equipment

N.J.A.C. 12:100-10.3 Organization, Training and Education

- The employer shall prepare a statement or written policy which contains the following
 - The basic organizational structure
 - The expected number of members
 - The functions the fire service is to perform
- This policy must be available during a PEOSH inspection

N.J.A.C. 12:100-10.3 Organization, Training and Education continued

- Training requirements include:
 - All must receive Firefighter I certification
 - All Interior Firefighters must drill at least quarterly
 - All members must drill at least annually
 - Trainers must have received training which is more comprehensive than the members for which they provide training

N.J.A.C. 12:100-10.3 Organization, Training and Education continued

- All Firefighters shall be instructed in special hazards they may encounter which may include storage and use of flammable liquids and gases, toxic chemicals, radioactive substances, and water reactive substances
- There must be written procedures which describe actions to be taken in situations involving these special hazards.

N.J.A.C. 12:100-10.3 Organization, Training and Education continued

- All Firefighters shall receive training in the following:
 - HAZWOPER Operations Level I
 - Bloodborne Pathogens
 - Incident Management Systems I-100

N.J.A.C. 12:100-10.3 Organization, Training and Education continued

- If these tasks are performed they shall also receive training:
 - Confined space rescue
 - Trench rescue
 - High angle
 - Technical rescue operations
 - Etc.

Other PEOSH Required Training

- The following general PEOSH training is often required in fire stations:
 - Personal Protective Equipment (PPE)
 - Lock Out Tag Out
 - Emergency Evacuation Procedures
 - *Respiratory Protection*
 - *Hazard Communication*

Other PEOSH Required Written Programs

- The following general PEOSH written programs and records are often required in fire stations:
 - PEOSH 300 Logs
 - Personal Protective Equipment (PPE) Hazard Assessment
 - Lock Out Tag Out Program
 - Emergency Plan
 - Permit Required Confined Space
 - *Respiratory Protection Program*
 - *Hazard Communication*
 - *Bloodborne Pathogens*

N.J.A.C. 12:100-10.4

Personnel

- To ensure all members are physically capable of performing interior structural firefighting they must pass a physical equivalent to the Medical Evaluation Protocol required in OSHA's 29 CFR 1910.134 Respiratory Protection Standard prior to appointment
- Failure to pass will exclude a member from serving as a structural Firefighter

N.J.A.C. 12:100-10.5

Protective Clothing

- The employer shall provide at no cost to the employee, and assure the use of, protective clothing which complies with this subchapter.

**These boots have no
tread left?**



**These need to be
replaced – N.J.A.C.
12:100-10.6(a)(1)**

JUL 30 2007

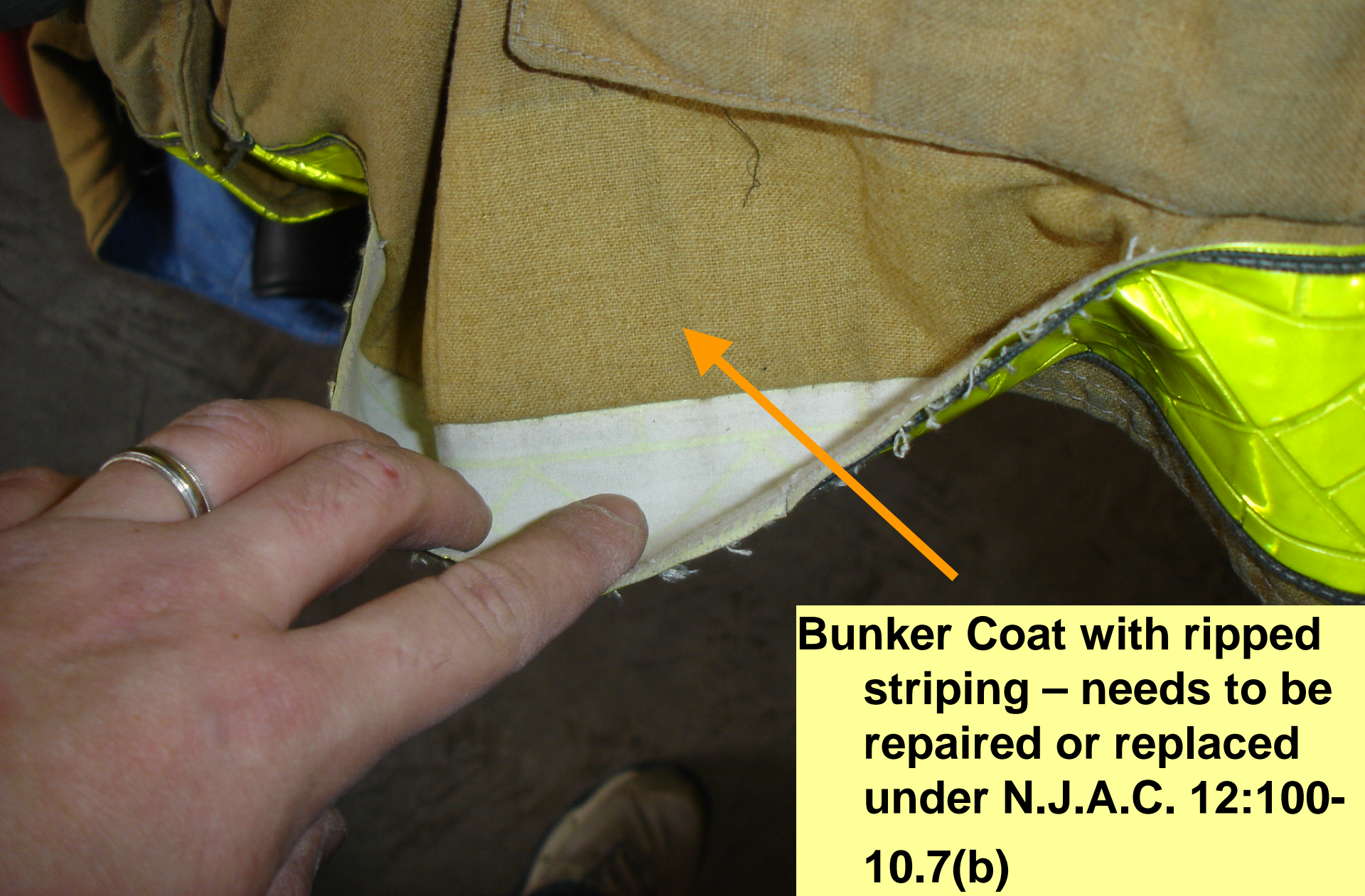
**Toes need to be repaired
or boots replaced –
N.J.A.C. 12:100-
10.6(a)(1)**




Are these boots OK?

JUL 30 2007

**What is the matter with
this picture?**



**Bunker Coat with ripped
striping – needs to be
repaired or replaced
under N.J.A.C. 12:100-
10.7(b)**



**Bunker Coat with burn
through the pocket –
Needs to be repaired
or replaced.**

NOV 26 2007

**Something wrong with
these bunker pants?**



**Need to be repaired or
replaced under
N.J.A.C. 12:100-10.7(b)**

What about here?



OCT 3 2007



Are these OK?

SEP 23 2005

Don't forget about the lining.



**All of these bunker pants
need to be repaired or
replaced under
N.J.A.C. 12:100-10.7(b)**

How safe is this?



**Gloves need to be
replaced – N.J.A.C.
12:100-10.8(a)**

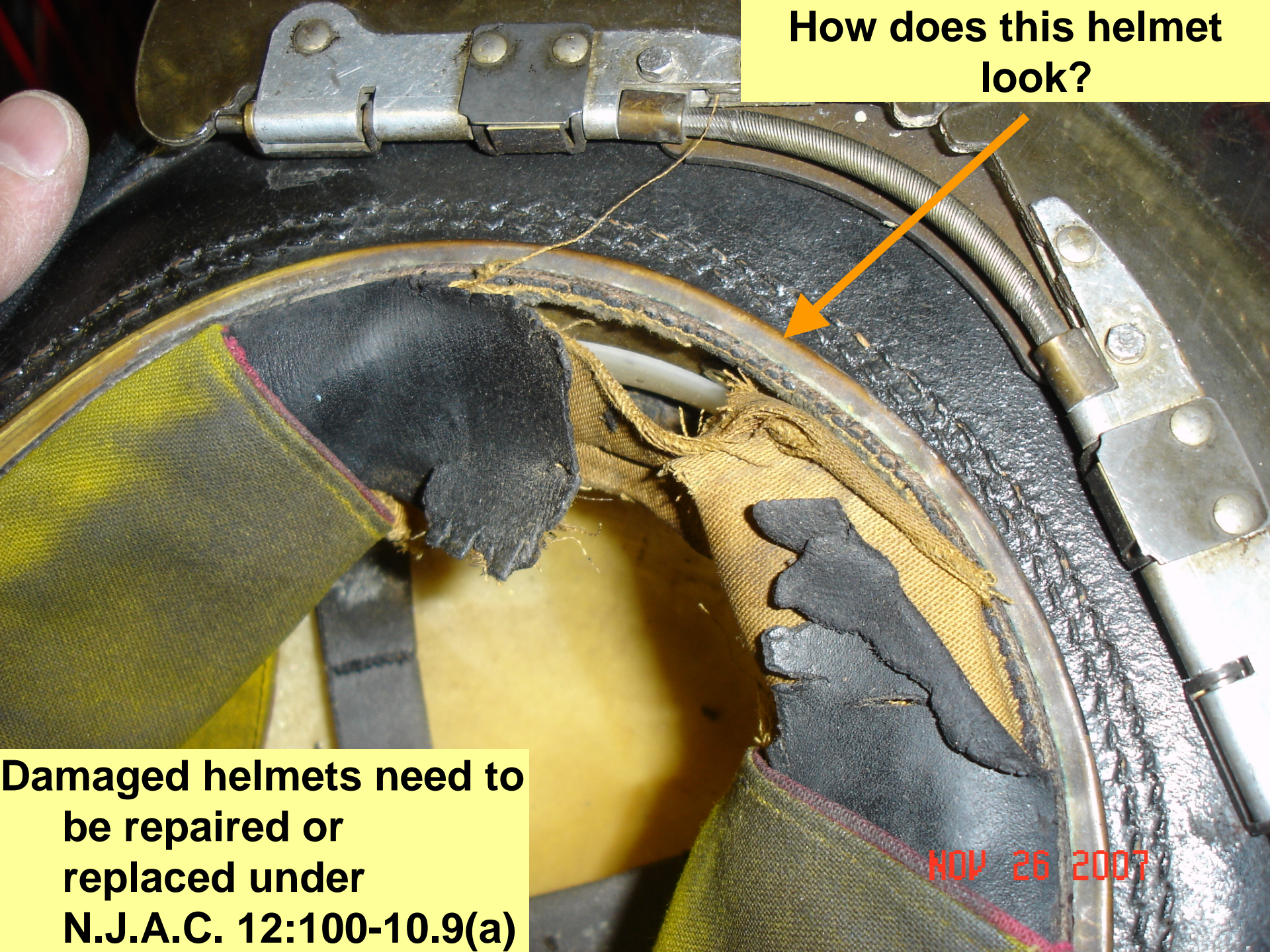
NOV 26 2007

Another bad glove



JUL 30 2007

How does this helmet look?



Damaged helmets need to be repaired or replaced under N.J.A.C. 12:100-10.9(a)

NOV 26 2007

**This helmet has seen
better days – exposed
wire in rim**



JUL 30 2007

**This helmet looks pretty.
Is there a problem
here?**



JUL 30 2007

No reflectors



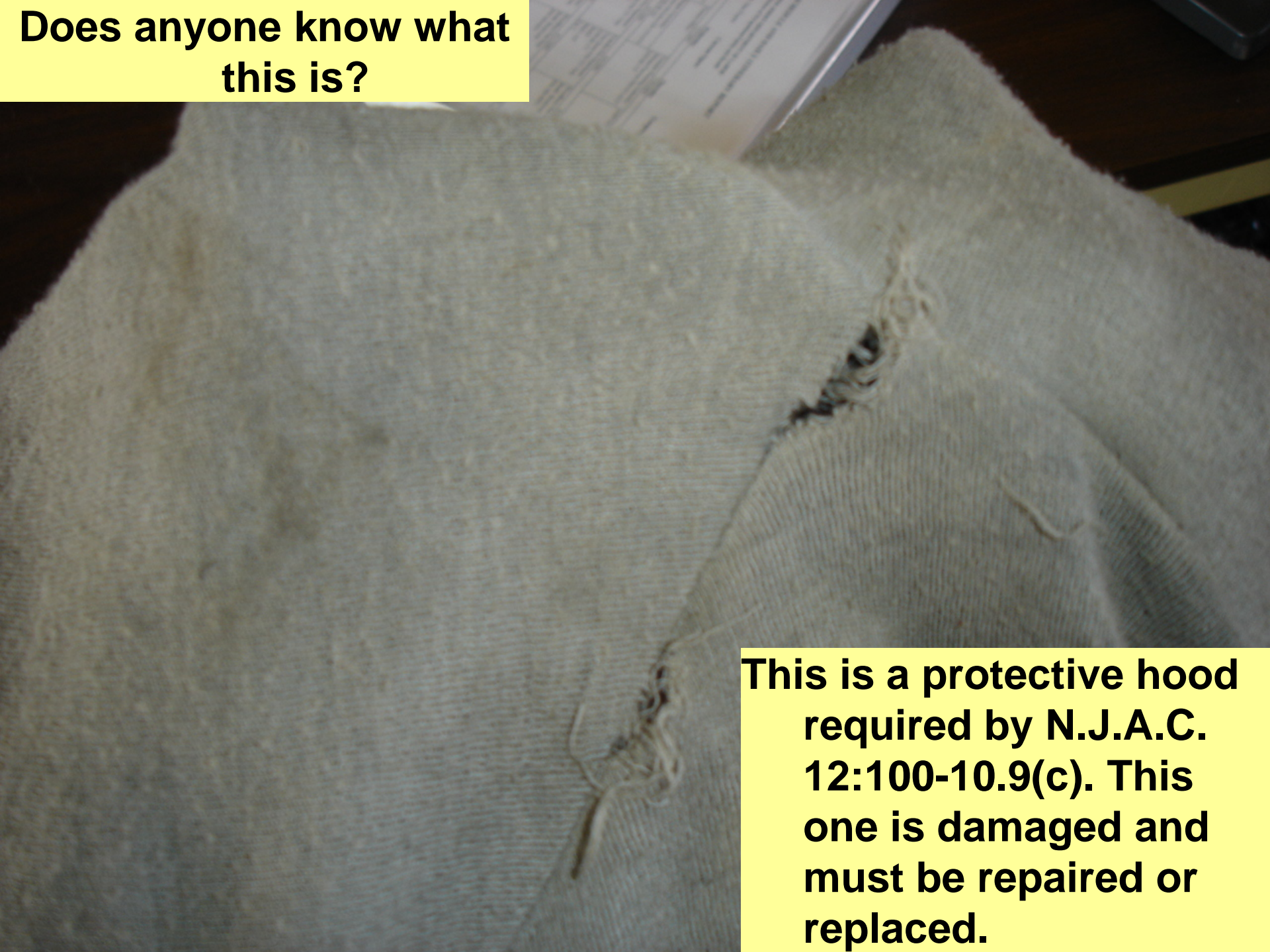
N660C MLE
Cairns & Brother
WARNING
READ INSTRUCTION BOOKLET
BEFORE USING THIS HELMET
Removal of this label voids all warranties.

Anyone see a problem here?

The tab is broken so the entire impact cap can be removed from the helmet. All of these helmets need to be repaired or replaced under N.J.A.C. 12:100-10.9(a)

JUN 13 2006

**Does anyone know what
this is?**



**This is a protective hood
required by N.J.A.C.
12:100-10.9(c). This
one is damaged and
must be repaired or
replaced.**

N.J.A.C. 12:100-10.10

Respiratory Protection Devices

- Must be worn when:
 - Interior structural firefighting
 - Confined spaces
 - Emergency situation involving toxic substances
 - During all phases of firefighting and overhaul



N.J.A.C. 12:100-10.11

Life Safety Rope, Harness and Hardware

- For Departments that perform rope rescue:
 - Ropes, harnesses and hardware must be provided at no cost.
 - Ropes, harnesses and hardware must comply with NFPA 1983-1985
 - *Note: Training and written procedures are also required as written in NJAC 12:100-10.3*



N.J.A.C. 12:100-10.12

Personal Alert Safety System

- Required that all employees are provided with a PASS device at no cost.
- Both external and integrated PASS devices are compliant.
- These must be in working order at all times.



N.J.A.C. 12:100-10.14

Filling Air Cylinders

- Firefighters must receive training before filling SCBA tanks.
- The filling station must have proper facilities to ensure the safety of personnel.



N.J.A.C. 12:100-10.15

Fire Apparatus Operations

- All Firefighters except the driver must don their protective gear before leaving the station.
- All seat stations must have a restraining device for Firefighters such as a seatbelt.
- All fire apparatus remanufactured after 1/4/1993 must have enclosed crew quarters.



N.J.A.C. 12:100-10.16

Maintenance



All department aerial apparatus is subject to visual inspection, operational tests, and load tests at least annually. Complete fire apparatus inspections and tests, including the non-destructive testing defined in NFPA 1914-1991, whenever a potential problem is indicated or every five years.

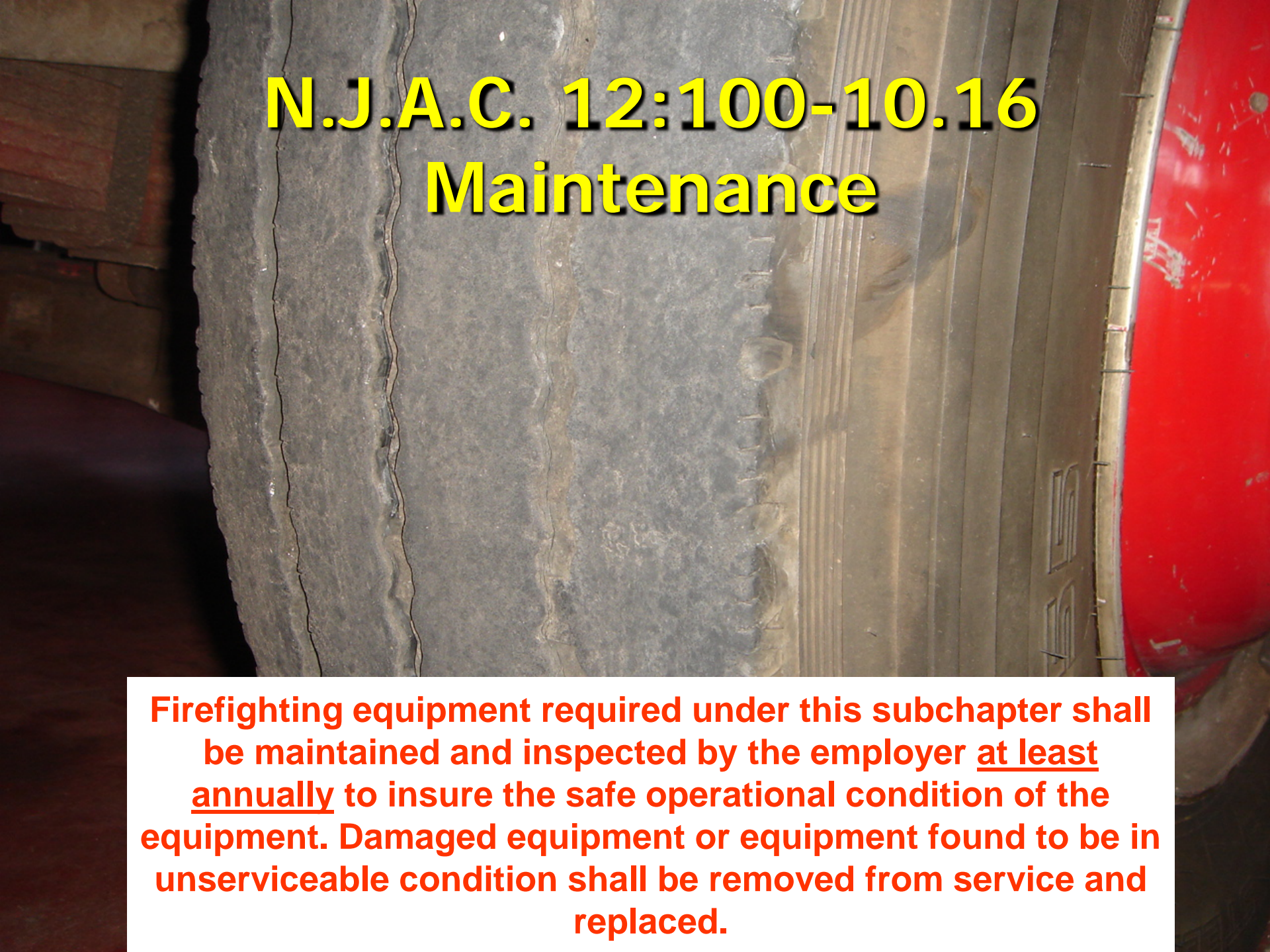
N.J.A.C. 12:100-10.16

Maintenance



Pumper fire apparatus shall be inspected at least annually in accordance with criteria of NFPA 1911-1997.

This includes initial attack fire apparatus and mobile water supply fire apparatus.



N.J.A.C. 12:100-10.16 Maintenance

Firefighting equipment required under this subchapter shall be maintained and inspected by the employer at least annually to insure the safe operational condition of the equipment. Damaged equipment or equipment found to be in unserviceable condition shall be removed from service and replaced.

Top 10 PEOSH Safety Violations in Local Fire (10/2010 to 9/2011)

1. 1910.305 Wiring methods, components, and equipment for general use
2. 1910.303 Electrical general requirements
3. 1910.37 Maintenance, safeguards and operational features for exit routes
4. 1904.29 Recordkeeping
5. 12:100-10.7 Firefighter PPE – Bunker Coats / Pants
6. 12:100-10.9 Firefighter PPE – Helmets
7. 1910.157 Portable Fire Extinguishers
8. 1910.176 Handling materials – general
9. 34:6A-33(a) General Duty
10. 12:100-10.6 Firefighter PPE - Boots

Cooperative Programs

PEOSH On-Site Consultation

Benefits

- Voluntary – available to all public employers
- A FREE no-cost advisory consultation
- Confidential
- No citations or penalties
- Scope of visit - modified at employer's request (full or limited)
- Documentation – the employer receives a written report complete with abatement assistance recommendations.

Cooperative Programs

PEOSH On-Site Consultation

Consultation Process

- Opening Conference
- Walk-through inspection
- Closing Conference
- Follow Up
- Employer/Employee Training

SHARP Award



- If your department demonstrates an exemplary safety and health management system and below average injury / illness rates you could qualify for the Safety and Health Achievement Recognition Program (SHARP).
- This is an inspection deferral program – no scheduled PEOSH enforcement inspections.
- You get a plaque, a flag, and the reputation as being on of the very best.

SHARP Award

- To begin the process schedule a consultation.
- Join our other SHARP Fire Companies:
 - Bellmawr Fire Department

Cooperative Programs

PEOSH Occupational Safety Training Unit

- Free, On-Site training available to all public employers.
- Provide instruction in many different safety topics including Forklift Operation, Lock Out / Tag Out, PPE, Hazard Communication, Fall Protection, Back Safety, and many others.

Cooperative Programs

Contact Information

- By Phone (609) 633-2587
- Web Address for PEOSH Consultation:
http://lwd.state.nj.us/labor/lisse/employer/peosh_consultation.html
- Web Address for PEOSH Occupational Safety Training:
http://lwd.state.nj.us/labor/lisse/employer/OSH_Training_Unit.html
- Email at
Safety&health_Training@dol.state.nj.us