

OSHA's Top Print Citations & How to Avoid Them



When it comes to workplace safety, it seems like all we have heard for the past year is, “COVID, COVID, COVID.” But as John Holland, President of Assured Compliance Solutions, Inc., reminded us in a recent webinar, our pandemic-related safety measures must be in addition to all of our regular plant safety policies and procedures. None of the “regular” hazards have gone away.

Why keep your shop safe? First and foremost, to avoid serious accidents and injury. Beyond that, keeping your shop safe can help you avoid expensive civil injury liability lawsuits and crippling OSHA fines.

The following provides a recap of some of the highlights of John's presentation on “OSHA's Top 10 Print Citations & How to Avoid Them.” A full recording of the webinar is also available at <http://bit.ly/10-Print-Citations>.

It all starts with your Injury & Illness Prevention Program

An Injury and Illness Prevention Program (also called an Accident Prevention or Workplace Safety Program) is meant to help you eliminate hazardous conditions

and practices in your workplace. As such, it is your first line of defense against both OSHA citations and civil injury liability. If you can prove that you have an effective safety program in place—and that you are providing the necessary training and enforcement—then you will most likely win in court.

- To be effective, this program must have a number of elements, including:
- Company policy statement
- Safe practices code
- Machine guarding requirements
- Lockout/Tagout and “inch safe service” requirements
- Use of PPE
- Regularly-scheduled hazard assessments / plant inspections
- Documented employee training
- Thorough accident investigation policies
- Disciplinary action for employee non-compliance

In the webinar, John discussed some of the specific safety policies and practices required to avoid citations in various key areas. In this recap we'll cover his advice on avoiding the top five most common OSHA citations in the printing industry in 2020.

OSHA Citation #1: Machine Guarding

You MUST guard against cutting, crushing, entanglement, shock or burn, and you must do this with total guards. Partial guards are never acceptable.

You must guard against both the obvious hazards and the less-obvious hazards. Never assume that your employees “know better” than to, say, reach their hand into a dangerous spot. Maybe they do know better, but what would happen if a worker got a little dizzy and lost his or her balance? Would this person bounce off of a guard or fall into a hazardous area?

Never substitute a warning for a guard. Instead, post signage on your machinery stating: “Do Not Run This Machine Without All Guards In Place.” Do not allow machines to be run with any guards open, off or broken; this includes guards, side panels and interlocks. Make it clear to your team members that following your machine guarding policies is a mandatory condition of employment.

Also, keep in mind that there is no “grandfather clause” regarding machine

guarding. If your machine did not come with guards you must either replace the machine, get the manufacturer to fabricate guards or have guards fabricated yourself.

OSHA Citation #2: Control of Hazardous Energy

When a piece of equipment is being serviced or repaired, you must have complete control over the energy source that normally powers this equipment. This is where your lockout / tagout policies come into play. You need to ask: If the machine is accidentally started up by any employee or service repair person during the servicing process, could someone get injured? If the answer is yes, the machine must be locked out before the work begins.

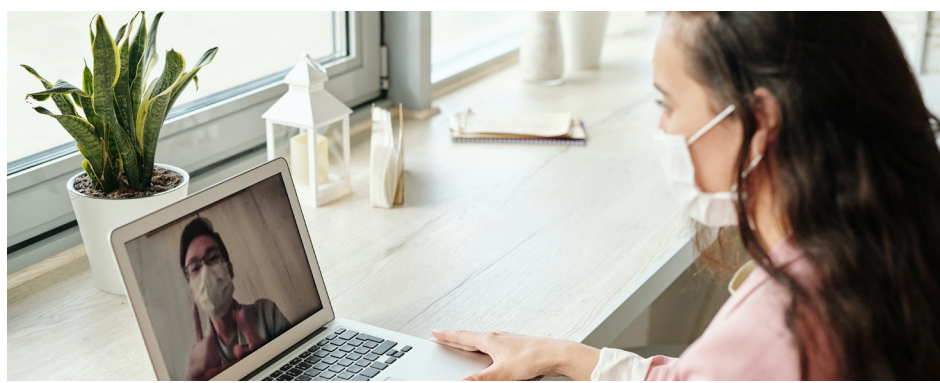
Some of the things that OSHA will look at in this area include:

- If your safety policies adequately address authorized, affected and

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GOVERNMENT & LEGISLATIVE

On Our Radar



Recently added to the list of proposed regulations and other issues that we're following:

- **Bereavement leave** – AB 95 would create a mandatory unpaid bereavement leave benefit upon the death of an employee's spouse, child, parent, sibling, grandparent, grandchild or domestic partner. Employers with fewer than 25 employees would be required to grant up to 3 business days of leave, while those with 25 or more employees would be required to provide up to 10 business days of leave.
- **Cal/OSHA COVID-19 standard** – Cal/OSHA is working on a permanent COVID-19 standard to replace the current emergency temporary standard. A variety of measures are being considered to clarify the existing standard and either broaden or narrow its scope.
- **Expansion of CFRA paid sick leave** – The California Family Rights Act (CFRA) provides leave for an employee to care for a seriously ill family member. AB 1041 would expand the definition of “family member” in the CFRA to include “any other individual related by blood or whose close association with the employee is the equivalent of a family relationship.”
- **Increased enforcement of Cal/OSHA COVID-19 rules** – In situations where an employer willfully violates a COVID-19 safety standard and qualifies as an “egregious employer,” SB 606 would require Cal/OSHA to issue citations that consider each exposed employee a separate violation. The bill would also establish a rebuttable presumption that an employer's actions against an employee are retaliatory in certain circumstances.
- **Telework Flexibility Act** – AB 1028 would allow a nonexempt employee who is working remotely to request an employee-selected remote work flexible work schedule of up to 10 hours per day within a 40-hour workweek, without triggered overtime pay requirements. It would also allow nonexempt employees working remotely to opt out of California's strict timing requirements for meal and rest periods.

HUMAN RESOURCES

How to Make Good Use of Your Employee Handbook

Employee handbooks are a nifty communication and reference tool for the workplace, but only if they're used and not collecting dust on some physical (or digital) shelf. A handbook is only as good as what it does. At the minimum, it should do the following:

Introduce employees to the fundamentals of your organization's culture—the beliefs and values that members of the organization are expected to share.

This introduction explains what you do and why you do it. It may also give employees a look into the history of your organization, how you got to where you are and where you intend to go. Last but not least, it gives employees an idea of how they can contribute to the culture.

Communicate to employees what general behaviors and procedures are expected of them.

These include general safety responsibilities, confidentiality expectations, timekeeping processes, reporting procedures, dress codes and any other ways of doing things at your organization.

Educate employees about what they can expect from the organization's leadership.

Executives, managers and HR departments have obligations to their employees—both those they've established themselves and those required by law. A good handbook tells employees what those obligations are and how they will be met. If your

employees are entitled to leaves or accommodations, for example, your handbook should explain these.

Support consistent enforcement of company policies.

Employers expose themselves to risk when they interpret, apply or enforce policies inconsistently. Transparency about policies and how they are enforced helps keep everyone accountable and the enforcement of rules consistent across the company.

Showcase the benefits the organization offers.

Does your organization offer vacations, 401(k), health insurance, paid parental leave or other employee benefits? If so, your handbook should outline these programs and their eligibility requirements.

Let employees know where to turn for help.

Employees should feel safe turning to HR or a manager to report workplace violations, get workplace-related assistance, and get answers to any other questions they may have. The alternative is for them to turn to an outside third party, like the EEOC, the DOL or an attorney, which could trigger a costly and time-consuming investigation. When a handbook provides multiple ways for an employee to lodge a complaint (ensuring they won't have to report the problem to the person creating the problem), they are more likely to keep their complaints in-house.

Source: HR | Bizz

BUSINESS MANAGEMENT

Ink & Coating Update

When you're in the business of putting ink on paper, it's important to keep up with what's happening in the world of ink. This new occasional column will help you to do so.

First the bad news: Ink and coating prices are going up

As you may have already heard from your ink and coating suppliers, in March many manufacturers issued warnings and announced outright price increases and/or “temporary surcharges.” These are hitting across a wide range of inks and coating products used by commercial and packaging printers.

What's driving these price increases? A confluence of issues in the global supply chain:

- **Increase in raw material costs** – Strong global demand coupled with some factory closures in China and elsewhere has resulted in shortages and price increases for many raw materials. For example, chemical companies have announced an increase in the price of alcohols. Vegetable oils and vegetable oil derivatives are facing higher costs, which impacts alkyd resins and esters. There has been a significant increase in the cost of pigments, including titanium dioxide. China has reportedly been buying up titanium dioxide supplies, which is used as a white pigment in both printing inks and paints. The National Association of Printing Ink Manufacturers reports that “virtually all material families for the printing ink industry, including oil, energy curable, solvent and water-based systems, have been greatly impacted.”
- **Increase in demand for oil** – Between mid-November 2020 and mid-March 2021 the price of crude oil increased by 49%. This impacts the propylene and petroleum distillates used in energy-curable inks and coatings, as well as the carbon black and resins used in conventional inks.
- **Dramatic increase in sea freight costs** – The COVID-19 pandemic has resulted in a worldwide logistics nightmare. Ships are backing up at the docks. There is a significant shortage of shipping containers—or at least a global mismatch between where the containers actually are and where they are needed. As a result, a container that cost \$1,500 to ship before these problems hit might cost \$15,000 to ship now. On top of this, the cost of the plastic pails and steel drums that are often used to ship ink raw materials and finished product has gone up as well.
- **Weather-related supply chain disruptions** – February's ice storm in Texas triggered a global plastics shortage, which affected the production of resins, surfactants and polymers. It may take up to two months for this issue to work its way through the supply chain.

Luckily, the news is not all gloom and doom

To get insight into some of the positive trends in the ink industry we spoke with Carl Hirsch, President of Ink Systems (www.InkSystems.com), a manufacturer of high-performance lithographic printing inks and coatings. Here's what Carl is seeing...

- **Greater demand for decorative print techniques on packaging** – The pandemic-related shutdowns accelerated the trend towards online ordering of consumer products. This has led to a greater demand for package differentiation amongst many brands, especially those associated with online influencers.

“The demand for packaging that stands out is now higher,” Carl says, “while the expectations for quality have grown. Packaging must look fabulous both online and once it arrives at consumers' homes, where ‘unboxing’ is now part of the ‘brand experience’ that companies are striving to create. Consequently, decorative coating techniques, the use of specialty inks such as metallics and fluorescents, and the ability to ensure color consistency across multiple printing techniques are all in strong demand.”

- **New approach to sustainability** – Just as print customers are demanding certification that the paper we use comes from responsibly-managed forests, they are also asking for sustainable inks. With more organizations focusing on what is known as “ESG” initiatives (Environmental, Social and Governance), the demand for sustainability across all aspects of the supply chain is only likely to increase.

“While the focus is often on the sustainability of the ink product itself,” Carl points out, “you also need to have people managing this ink. If you use a high bio-renewable ink, but later have to dispose of half of your ink order as a hazardous waste because you bought far more of that unique color than you needed, you're really not doing the environment any favors.”

Some companies, including Ink Systems, are helping printers take a close look at how much ink is actually needed for a job before they order. Then, if the ink is a non-inventory item, they are only producing that amount.

- **Shorter make-ready times** – On the efficiency side, some manufacturers are creating better-performing inks that get up to color quickly and then reliably stay within color tolerance.

“Although these are sometimes more expensive inks,” Carl explains, “printers find that they actually reduce the overall costs of the job. The shorter make-ready times reduce paper and labor costs, while the inks' greater color stability reduces waste throughout the print run.”

Bottom line: Although no one likes price increases, these positive trends bode well for many PIASC members.

FEATURE ARTICLE

Continued from front

other people. In this case, “authorized” refers to the actual persons performing the repair (including your supervisor who must be involved when more than one service person is participating), while “affected” refers to the operators of the machine being repaired. “Others” can be pretty much anyone else in the area, including a supervisor or customer service person who is standing there watching the work being done.

- **If guards or panels must be removed for repair.**
- **If you are locking out the energizing source so that the machine cannot start during servicing.**
- **If you are using warning tags in addition to lockout / tagout.**
- **If you have machine-specific written lockout / tagout procedures** posted on or near the applicable machine that identify the exact location of the energizing sources, including:
 - o Machine power switch
 - o Service disconnect switch
 - o Direct plug machine
 - o Exact panel and switch number
 - o Pneumatic airline disconnect
 - o Specific written procedures for associated coaters, heaters, dryers, etc.

Exceptions to the lockout / tagout requirements include during implementation of Inch Safe Service; during minor servicing (i.e. routine, repetitive servicing that’s integral to machine use) that poses no danger or hazard to the persons doing the servicing; and when the plug can be kept within the repair person’s arm reach at all times.

Note that in this last situation, if the repair person leaves the area for even a moment, that plug must be put in a lockout canister and locked.

OSHA Citation #3: Powered Industrial Lift Trucks

Motorized lift trucks are big deals! Each year there are 85 deaths and 34,900 serious injuries resulting from 95,000 forklift accidents. It’s no wonder OSHA takes forklift safety very seriously.

- There are over 60 rules that must be followed for forklift safety. Drivers must successfully complete formal classroom training covering all of these rules before they get behind the wheel.
- Forklift safety basics include:
 - Wear a seat belt
 - Drive no faster than walking speed when inside a building (this is the recognized best practice)
 - Do not drive with a raised load (i.e. a load that is more than 4 to 6 inches off the ground)
 - If the load blocks vision going forward, drive in reverse; never hang your head out the side trying to see around the load
 - Yield to pedestrians
 - Honk when entering/leaving buildings and at blind intersections

OSHA Citation #4: Personal Protective Equipment

Your written Personal Protective Equipment (PPE) policy will flow from the regularly-scheduled hazard inspections that are part of your Injury & Illness Preven-

tion Program. You must identify all of the hazards that require PPE, by job function, and identify the specific PPE required. Then you must provide employees with this PPE free of charge, provide proper training on when and how to use the PPE, and, of course, enforce these rules. Naturally, all of this must be documented.

For example, your written hazard assessment might state that press operators need to wear safety goggles and nitrile gloves for press clean-ups, in order to protect against caustic chemicals. Shipping and receiving clerks must wear hard-toed shoes, in order to protect against heavy objects being accidentally dropped on their feet. And so forth.

You cannot just plan to show OSHA a cabinet full of PPE. You must have a written hazard assessment for each function and evidence that these policies are being enforced.

OSHA Citation #5: Hazard Communications

In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals being used in your workplace must be available and understandable to workers. OSHA’s Hazard Communication Standard is meant to make this happen. This Standard is now aligned with the Globally Harmonized System of the classification and labelling of chemicals, known as GHS.

You must have an industry- and company-specific written hazard communications program. Your employees must be trained on how to read and understand the Safety Data Sheets (SDSs) for haz-

ardous chemicals. They must also know where your updated SDSs are located. In addition, you must store these SDSs so that there is an easy way to find the page for a particular chemical product.

For example, you should have an accurate chemical product listing in the front of your SDS Book. Your list can be alphabetical by manufacturer, product or department. Many companies also number their SDSs to facilitate a quick look-up. This way an employee can simply find the manufacturer/product name on the list and then go to the specifically numbered SDS; SDS #18 will always be behind #17 in the book. OSHA now also accepts a 24/7 easy-to-use electronic look-up system for your employees, as long as you have enough computers readily available to service your employees’ needs.

Note that if what you have on hand are only the old Material Safety Data Sheets (MSDSs) instead of the new GHS-based SDSs, OSHA will know that you have not updated anything in at least five years. That, in itself, is an automatic citation. Please keep old MSDSs in a separate “outdated” book or file, which can also be electronic.

Continue reading at: <http://bit.ly/OSHA-Finish-Article>

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MEMBER NEWS

The Dot Corp has purchased the SCREEN Truepress 520 HD press to better serve direct mail and print clients. <http://bit.ly/DotCorp-Press>

Plumtree Marketing, Inc. announces the launch of the Plumtree Marketing Academy, an online course business providing marketing training for small business owners and other professionals. www.plumtreemarketingacademy.com.

To participate, please email your *one-sentence announcement* to Wendy Ferruz at Wendy@piasc.org.

CLASSIFIEDS

A PRINTING COMPANY IS BEING SOLD. Located in Canoga Park, the business is in “move in” condition. For more information contact Kristy Villanueva, 323.728.9500, Ext. 215.

SELLING YOUR PRINTING/DIRECT MAIL COMPANY? A well-established Orange County marketing service provider is looking for a bolt-on acquisition to expand mailing capability. If your annual sales are over \$1 million, contact Lou Caron, 323.728.9500, Ext. 274.

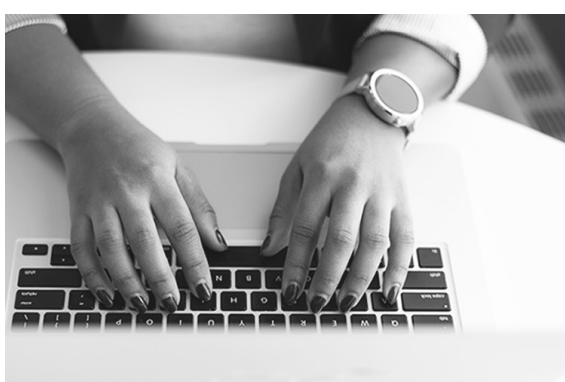
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Want to place a classified ad? Contact Wendy Ferruz, 323.728.9500, Ext. 262, wendy@piasc.org



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