



# Southern Oregon Construction Safety & Health Forum

2018 Winter  
Eighth Edition

**AGC** Oregon  
Columbia  
Chapter  
ASSOCIATED GENERAL CONTRACTORS

It remains our mission to maintain effective safety and health program communication with AGC members. In this busy building season it can be difficult to commit to meetings; this forum letter is intended to give us all opportunity to share information on current rules, conditions, and changes that affect our safety cultures and our communities. If you have information you are willing to share with members, please contact me and we will ensure that information gets out for everyone's benefit: John Jean, AGC SMC, [johnj@agc-oregon.org](mailto:johnj@agc-oregon.org) or 541-613-6859.

## OSHA INJURY TRACKING APPLICATION – ELECTRONIC SUBMISSION OF INJURY AND ILLNESS RECORDS

The date by which certain employers are required to submit to OSHA the information from their completed 2016 Form 300A has been extended to **December 15, 2017**.

**Who:** Establishments with 250 or more employees that are currently required to keep OSHA injury and illness records, and establishments with 20–249 employees that are classified in certain industries with historically high rates of occupational injuries and illnesses. *Note that the following OSHA-approved state plans have not yet adopted the requirement to submit injury and illness reports electronically:* California, Maryland, Minnesota, South Carolina, Utah, Washington, and Wyoming. Establishments in these states are not currently required to submit their summary data through the ITA. Similarly, state and local government establishments in Illinois, Maine, New Jersey, and New York are not currently required to submit their data through the ITA. Contact information for each of the state plans can be found [here](#).

**What:** Covered establishments with 250 or more employees must electronically submit information from OSHA Forms 300 (Log of Work-Related Injuries and Illnesses), 300A (Summary of Work-Related Injuries and Illnesses), and 301 (Injury and Illness Incident Report). Covered establishments with 20–249 employees must electronically submit information from OSHA Form 300A.

**When:** The requirement became effective on January 1, 2017. The new reporting requirements will be phased in over two years. In 2017, all covered establishments must submit information from their completed 2016 Form 300A by December 15, 2017. In 2018, covered establishments with 250 or more employees must submit information from all completed 2017 forms (300A, 300, and 301) by July 1, 2018, and covered establishments with 20–249 employees must submit information from their completed 2017 Form 300A by July 1, 2018. Beginning in 2019 and every year thereafter, covered establishments must submit the information by March 2.

**How:** OSHA will provide a secure website that offers three options for data submission. First, users will be able to manually enter data into a web form. Second, users will be able to upload a CSV file to process single or multiple establishments at the same time. Last, users of automated recordkeeping systems will have the ability to transmit data electronically via an API (application programming interface). We will provide status updates and related information [here](#) as it becomes available.

## DANGEROUS SILICA EXPOSURES

### Overview and Applicability

The federal Occupational Safety and Health Administration (OSHA) recently issued new rules to protect workers from occupational exposure to respirable crystalline silica. The original permissible exposure limit (PEL) used by OSHA to protect workers was set in 1971. See the available guides:

- [Oregon OSHA Fact Sheet Silica Rule Table 1](#)
- [Oregon OSHA Fact Sheet New Silica Rule fs67](#)
- [OSHA Small Entity Guide Silica 2016 3902](#)

SAIF has developed a guide to provide employers with knowledge of the health effects and protective measures for controlling exposures to respirable crystalline silica. A step-by-step approach is provided for businesses to use to determine applicability of the rules to their organizations and implement efforts to protect worker safety and health.

### NEW RULES FOR WALKING-WORKING SURFACES TAKE EFFECT NOV. 1, 2017

**Changes cover a wide range of workers and include portable ladders, training, dock boards, fall protection, and more.** Oregon OSHA has adopted several changes to the walking-working surfaces rule to align general industry standards with construction. The changes became effective November 1, 2017, and apply to all general industry workplaces. Some requirements have later dates to allow employers time to comply.

- Nov. 1, 2017: New rules went into effect and can be enforced
- Jan. 1, 2018: Dock-boards must meet new rules
- Nov. 1, 2018: Fixed ladders extending more than 24 feet must have personal fall arrest system or ladder safety system.
- May 1, 2018: Deadline for employee exposure training for personal fall protection systems and proper care, inspection, storage, and use of equipment.

### Here are some highlights:

Under the new rules, portable ladders:

- Must have slip-resistant rungs and steps
- Must be secure and stable on slippery surfaces
- May not be moved if a worker is on the ladder
- Cannot use top step and bottom caps as steps
- Cannot be fastened together to increase length (unless designed for that purpose)
- Cannot be placed on boxes or barrels to increase height

Fixed ladders longer than 24 feet must have a personal fall arrest system or a ladder safety system.

**Make ladder safety a priority of your safety culture!**