A recent Utah Occupational Safety and Health (UOSH) inspection on the University of Utah campus offers some valuable insight into where our safety programs can be strengthened. This bulletin summarizes the findings of the investigation and more importantly, the lessons learned. Please take this opportunity to pause for a moment, review this information and take a serious look at your own area of responsibility. If similar situations to these found during the investigation are present and need addressing, please contact OEHS.

In October 2015, UOSH investigators responded to an employee complaint regarding confined space safety in the fiber installation work group. The investigation was conducted over a period of several months and included records reviews, physical environment surveys, employee interviews and document requests. At the conclusion, fourteen regulatory violations were identified.

**Confined Space Standard:**
- Confined Space Evaluation not completed
- Confined Space Entry Training not provided for all employees
- Confined Space Rescue and Emergency Equipment not provided

**Telecommunication Standard:**
- Telecommunication Manhole Entry Training not provided
- First Aid and CPR Training
- Telecommunication Manhole internal atmosphere not tested
- Telecommunication Manhole continuous air supply not provided

**Hazard Communication Standard:**
- Written hazard communication program not provided
- Safety Data Sheets (SDS) not maintained
- Effective Hazard Communication training not provided

**Ladder Safety:**
- Ladders not properly secured
- Ladders not protected from corrosion

**Personal Protective Equipment:**
- Protective footwear not provided

**Housekeeping:**
- Clean and orderly workplace not provided

**Lessons Learned**

**Confined Space Entry**
Confined space entry, including telecommunication spaces is inherently hazardous. OSHA regulations require evaluation, entry procedures, training, specialized equipment, rescue protocols and other safeguards to ensure employees can safety enter and perform work. The university’s written Confined Space Program can be found on the OEHS website, see resource links below.

If your work requires confined space entry contact OEHS for applicable training, program review and equipment needs.

**Hazard Communication**
In order to ensure chemical safety in the workplace, information about the identities and hazards of the chemicals must be available and understandable to workers. OSHA’s Hazard Communication Standard (HCS) requires employers with hazardous chemicals in their workplaces to develop a written program, label and provide safety data sheets (SDS) for their exposed workers, and train them to handle the chemicals appropriately.

In this instance fiber technicians used compressed nitrogen in their process, no written hazard communication program was in place and a SDS was not available. The hazard communication standard applies to all work groups that have chemicals in use, including cleaning supplies, paint, and other chemicals that may not seem hazardous.

OEHS is developing a Hazard Communication Train the Trainer course for supervisors. In addition, the written Hazard Communication Program along with a department specific template are available on the OEHS website.
Personal Protective Equipment (PPE)
PPE is required in a multitude of workplace circumstances to protect against chemical, radiological, physical, electrical, mechanical, or other workplace hazards. Personal protective equipment may include items such as gloves, safety glasses and shoes, earplugs or muffs, hard hats, respirators, or coveralls, vests and full body suits. Foot, head, hand, eye and respiratory protection may be required dependent on the work you do. OEHS can assist in conducting a PPE assessment for your work group.

Ladder Safety
In the United States, more than 500,000 people per year are treated—and about 300 people die—from ladder-related injuries. The National Institute of Occupational Safety and Health (NIOSH) has identified five major causes of ladder injuries;

- Incorrect extension ladder setup angle
- Inappropriate ladder selection
- Insufficient ladder inspection
- Improper ladder use
- Lack of access to ladder safety tools and information

OEHS recently led a Ladder Safety Stand Down for many work groups across campus in order to address these causes and other ladder safety topics. The materials used including a toolbox talk, OSHA fact sheets and a link to the NIOSH Ladder Safety App are located on the OEHS website. If your work group would like OEHS to provide activities presented during the stand down, please contact us.

Training
Four of the citations were related to training, confined space entry, telecommunications manhole entry, first aid and hazard communication training are all required by regulation. Many other regulations require specific training, OEHS can assist in determining which training applies to your work group.

Housekeeping
OSHA requires that employers maintain a clean and orderly workplace. Cleanliness reduces potential for slips, trips, entanglement and other hazards. Orderliness enhances egress, space management and efficiency as well as safety.

Resources
- Ladder Safety
- Confined Spaces
- Hazard Communication
- Personal Protective Equipment

For more information contact Occupational and Environmental Health and Safety at 801.581.6590 or ehsquestions@ehs.utah.edu