




QUARTERLY SPECIAL REPORT

TOP EHS PRACTICES:

KEY COMPONENTS OF A FULL-SERVICE SAFETY PROGRAM



SAFETY & HEALTH



Following OSHA's regulations and staying in compliance are important, but we know you want to go beyond the minimum requirements to keep your employees safe. From employee training to written safety plans to chemical management, how can you ensure you're covering everything? And what does it take to go above what's required?

TRAINING

Training is a crucial element in a safety and health program. OSHA's regulations for general industry (29 CFR 1910), construction (29 CFR 1926), agriculture (29 CFR 1928), and maritime (29 CFR 1915, 1917, and 1918) contain numerous training requirements. These may include initial, refresher, and/or annual training. Most regulations have a Scope section to help you determine whether it applies to your organization.

OSHA typically cites training violations as serious violations, with a maximum fine of over \$16,000. In fact, OSHA can even issue a separate violation for each individual employee who was not trained.

It's a best practice to conduct annual training, even when a regulation doesn't require it. It may not be necessary to repeat your entire training program (unless a regulation specifically requires you to do so); instead you may choose to focus on one aspect of it, such as safety data sheets or labels on containers of hazardous chemicals.

REGULATIONS WITH NO TRAINING REQUIREMENTS

Some regulations, such as machine guarding, don't list any employee training requirements, but it's still important to make employees aware of hazards they may encounter on the job.





WHAT ABOUT RECOMMENDED TRAINING?

While OSHA doesn't have a list of recommended training, the General Duty Clause of the OSH Act states, "Each employer shall furnish to each of his employees employment and a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees." OSHA's action on ergonomic hazards in the workplace is a good example of the application of the General Duty Clause in situations where a standard does not currently exist. There are no standards governing job or work station design to reduce or prevent cumulative trauma disorders or other injuries. However, OSHA has widely applied the General Duty Clause to address ergonomic hazards in the workplace. Another example is training on heat stress, if it's applicable to your workplace.

TRAINING CONTENT

Training content generally must be workplace- and equipment-specific to cover: hazard recognition, steps employees should take to protect themselves, instructions and practice on how to use equipment and follow procedures, limitations of safe procedures and equipment, how to take care of equipment, what to do in an emergency, and where to get more information.

TRAINING RECORDS

While training records aren't always required by the regulations, it's a best practice to keep documentation of training. That makes it easy to keep track of who's been trained, to determine when refresher or annual training is needed - and to prove to an OSHA inspector that you've made a good faith effort to be in compliance.

WRITTEN SAFETY PLANS

OSHA has over 35 written plan, program, or procedure requirements throughout 29 CFR 1910 for general industry. Over 20 more are found in 29 CFR 1926 for construction. Whether required or not, written plans can benefit your company and employees.

If you use a template when writing your plan, you must tailor your plan to your own site and its operations, employees, and hazards.

WHAT'S REQUIRED?

Before writing any plan, find out what your company is required to do under applicable regulations, and see if a written plan or written requirements are specified in the regulations.

If the regulations do not have any written requirements or if there are no related regulations for your safety concern, decide whether your company could still benefit from a written plan.





WHY DEVELOP A WRITTEN PLAN IF IT'S NOT REQUIRED?

- ▶ Ensures that work involving a particular safety concern in your company is carried out safely to minimize the possibility of injury or harm to employees.
- ▶ Establishes uniform requirements designed to ensure that your safety measures are communicated to and understood by affected employees.
- ▶ Ensures that company-specific procedures are in place to safeguard the health and safety of all employees.

TIPS FOR WRITTEN PLANS



ABOVE AND BEYOND — If your plan goes beyond the basic regulatory requirements, be sure that you follow through on any additional elements. You don't want to document something that your company is not actually carrying out in practice.



KEEP IT FLEXIBLE — If your plan includes a detailed inspection checklist, for example, it can prevent the flexibility necessary to ensure a thorough inspection is conducted when other safety issues or concerns arise during a walkthrough.

REVIEWING WRITTEN PLANS

Many regulations call for updates as necessary, but some plans also require annual reviews and/or updates. For example, under the Bloodborne Pathogens Standard, the exposure control plan must be reviewed and updated at least annually, but also as necessary to include new or modified tasks and procedures.

If your plan isn't required by regulations, it's still a good idea to set a timeframe for review to ensure it's working the way you intended.



SAFETY MANAGEMENT SUITE'S MOST POPULAR WRITTEN TEMPLATES INCLUDE:

- ▶ Combustible Dust
- ▶ Bloodborne Pathogens
- ▶ Emergency Action Plan
- ▶ Confined Space Entry (Permit-Required)
- ▶ Fire Prevention
- ▶ Electrical Safety
- ▶ Forklift Operation
- ▶ Respiratory Protection
- ▶ Hazard Communication

CHEMICAL MANAGEMENT

Complying with OSHA's Hazard Communication (HazCom) standard can be a daunting task. If your employees are exposed to hazardous chemicals in the workplace, you're familiar with the standard's many requirements:

- ▶ Preparing and implementing a written plan
- ▶ Ensuring all containers are labeled
- ▶ Maintaining safety data sheets (SDSs)
- ▶ Conducting an effective training program

One compliance problem is not having a written program, or having a program that does not contain all required elements. One requirement is a list or inventory of the covered hazardous chemicals your facility uses. This trips up a lot of employers because creating the list can be a daunting task, but it is a requirement. Developing the initial list is time consuming, and then it must be kept current. You'll need a solid procedure to keep your chemical list updated.

The chemical inventory must include the product identifier that matches the associated label and SDS. It doesn't need to include quantities for OSHA's purposes, but you may want to add them to help with your compliance with some EPA requirements.



Labeling is another common trouble spot. All containers of hazardous chemicals in your facility, except for secondary containers for immediate use, must be labeled with information on the chemical's identity and hazards.

Another violation is not having an SDS for each chemical, or the SDS is not made available to employees in their work areas. There are a lot of different systems available to help with this process, including many online and electronic systems. Whatever method you choose, make sure that employees have access when they need it.

Finally, training is a big component of HazCom; you must train all employees with exposure, and provide additional

training when chemicals with new hazards are introduced. If you ever face an OSHA inspection, the compliance officer will likely question your employees about the HazCom program – and if your employees cannot satisfactorily answer those questions, OSHA may issue a citation for failure to provide effective training.

As these issues illustrate, one of the challenges of HazCom compliance is that you must place a lot of reliance on your employees. They need to understand their obligations, know when and where to access chemical information, apply labels when needed, and be able to answer questions about the program.



INCIDENT MANAGEMENT

Maintaining and analyzing injury and illness records helps you uncover workplace safety and health issues and track your progress in resolving them.

Losing employees to injury or illness, even for a short time, can cause significant disruption and cost – to your company as well as to employees and their families. It also can damage workplace morale, productivity, turnover, and reputation.

Under OSHA's Recordkeeping regulation, covered employers are required to prepare and maintain records of serious occupational injuries and illnesses, using the OSHA 300 Log. This information is important for employers, workers, and OSHA in evaluating the safety of a workplace, understanding industry hazards, and implementing worker protections to reduce and eliminate hazards.

While OSHA requires recordkeeping for injuries and illnesses, you may want to evaluate these injuries and illnesses to look for patterns. Are there certain jobs or duties that stand out? If so, how can they be addressed? Would it help to implement a stretching and flexing program for your manufacturing employees or to conduct a job hazard analysis for your warehouse employees?





**ACCURATE
RECORDKEEPING**
promotes proactive
compliance

You also may want to record near-misses, property damage, equipment failure, and safety observations. Are there hazards you hadn't considered? Have employees observed or suggested areas/things that need attention? Their suggestions and observations can help you stay proactive rather than reactive, and this type of collaboration can help build trust, enhance communication, and even lead to other business improvements.

Keeping your injury records in a format that allows for sorting the entries based on various factors (shift, location, type of injury) can help you identify trends or hazards, then address those concerns to prevent future injuries.

Going above and beyond means having a culture where everyone is involved in safety - it's part of the culture, not something to check off your list.

AUDITS

A critical element of any effective safety and health program is a proactive, ongoing process to identify and assess existing or potential hazards.

OSHA doesn't require you to audit your organization, but it's a good way to see if you're on track and in compliance. Conducting self-audits can be as simple or as complex as you choose, but every audit will be valuable - even if you simply get the peace of mind of verifying that you're meeting all of your obligations.

Audits help ensure compliance with OSHA regulations because the process requires a close examination of the workplace and processes for safety issues at all levels of the organization. They also help you involve workers in safety, which is a key element to a successful safety and health management system.



AUDIT VS. INSPECTION

Audits are different than inspections. Inspections are necessary to look at the facility, the process, and the individual jobs in order to identify and then eliminate or control any hazards that may exist, but the focus of an audit is different. An audit is defined as a process of verifying whether an established safety system conforms to defined criteria and that the system is effective. In other words, an audit would be used to check how an employer's inspection process is working.

Some areas that might be ripe for auditing include:



RECORDS - This could include records of injuries, written plans, permits (like confined space entry or hot work), or other documentation. Are your written plans and procedures being followed? Are they current? If you face an OSHA inspection, the compliance officer will likely review these documents, and you'll want to ensure that they're in order.



TRAINING MATERIALS - You'll want to ensure that they're up to date and reflect your current operations. If your training isn't current, it won't be effective.



EMPLOYEES - Questioning employees about their knowledge and retention of training helps ensure that they can work safely. After all, employees can't be expected to follow the rules and procedures if they don't remember them.

Going beyond the simple inspection process and implementing an effective audit program is critical to an effective safety and health management system. An audit is more than just a regulatory check; it involves looking at your safety management system to identify strengths and weaknesses.



CONCLUSION

Keeping compliant is important, but it's just the tip of the iceberg. As safety professionals, we know you're pressed for time, yet you want to go above and beyond what's required by the regulations to keep your employees safe. From training to recordkeeping to audits, J. J. Keller has the resources to help you do just that.



ABOUT THE AUTHOR

Rachel Krubsack, J. J. Keller & Associates, Inc.

Rachel Krubsack joined J. J. Keller & Associates, Inc. in 2010 and is an Environmental Health and Safety (EHS) Editor. She answers questions from safety professionals, and contributes content for a variety of publications and platforms, including Safety Management Suite and Compliance Network. Rachel's topics of expertise include hazard communication and OSHA training requirements.



ABOUT THE AUTHOR

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