January 2021

BIE SAFETY ADVISOR

OSHA Recordkeeping

Although you don't have to electronically submit your OSHA Form 300A (Summary of Work-Related Injuries and Illnesses) until March 2, 2021 and don't have to post your company's OSHA Form 300A until February, January is a good time to get all of your injury and illness records in order.

Electronic Submission of Records

Electronic submission of your company's 2020 Summary of Work-Related Injuries and Illnesses is required from employers with 20 or more employees classified in specific industries, of which construction is one.

OSHA's Injury Tracking Application (ITA) is used to provide the Agency with your OSHA Form 300A information. March 2, 2021, is the deadline for electronically reporting your OSHA Form 300A data for 2020. Collection will begin January 2, 2021.

In January 2019, to protect worker privacy, OSHA issued a final rule that eliminated the requirement for establishments with 250 or more employees to electronically submit information from OSHA Form 300 (Log of Work-Related Injuries and Illnesses) and OSHA Form 301 (Injury and Illness Incident Report). These establishments are still required to electronically submit information from OSHA Form 300A.

Also in January 2019, the agency amended the recordkeeping regulation to require covered employers to electronically submit their Employer Identification Number (EIN) with information from Form 300A. The EIN will make the data more useful for OSHA and Bureau of Labor Statistics (BLS).

Maintaining and Posting Records

Work-related injuries and illnesses records must be maintained at the worksite for at least five years. Each February through April, employers must post a summary of the injuries and illnesses recorded the previous year. Also, if requested, copies of the records must be provided to current and former employees, or their representatives.

Reporting COVID-19

Employers who are required to keep OSHA injury and illness records must still record work-related confirmed cases of COVID-19.

Under OSHA's recordkeeping requirements, COVID-19 is a recordable illness, and thus employers are responsible for recording cases of COVID-19, if:

1. The case is a confirmed case of COVID-19, as defined by the Centers for Disease Control and Prevention (CDC);
2. The case is work-related as defined by 29 CFR 1904.5; and
3. The case involves one or more of the general recording criteria set forth in 29 CFR 1904.7.

Given the nature of the disease and ubiquity of community spread, in many instances it is difficult to determine whether a COVID-19 illness is work-related. COVID-19 illnesses are likely work-related:

- when several cases develop among workers who work closely together with no other explanation;
- if it is contracted shortly after lengthy, close exposure to a particular customer or coworker who has a confirmed case of COVID-19 and there is no alternative explanation; or
- if job duties include frequent, close exposure to the general public in a locality with ongoing community transmission and there is no alternative explanation.

COVID-19 illnesses are likely NOT work-related:

- if only one worker contracts COVID-19 among workers who work closely together and job duties do not include having frequent contact with the general public.
- if the employee, outside the workplace, closely and frequently associates with someone who has COVID-19 and exposes the employee during the period in which the individual is likely infectious.

COVID-19 is a respiratory illness and should be coded as such on the OSHA Form 300. If an employee voluntarily requests that his or her name not be entered on the log, the employer must comply.

In all events, it is important as a matter of worker health and safety, as well as public health, for an employer to examine COVID-19 cases among workers and respond appropriately to protect workers, regardless of whether a case is ultimately determined to be work-related.

Additional Resources:
Detailed Guidance for OSHA's Injury and Illness Recordkeeping Rule:
https://www.osha.gov/recordkeeping/entryfaq.html
Injury Tracking Application:
https://www.osha.gov/injuryreporting/
COVID-19 Frequently Asked Questions:
https://www.osha.gov/coronavirus/faqs

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Monthly Toolbox Talk

COLD STRESS

Anyone working in a cold environment may be at risk of cold stress. Cold stress occurs by driving down the skin temperature and eventually your internal or core body temperature. This may lead to serious health problems, and may cause tissue damage, and possibly death. Wind chill is the temperature your body feels when air temperature and wind speed are combined. When temperatures are reduced by wind chill, heat will leave your body more rapidly.

The most common cold induced illnesses/injuries are hypothermia, frostbite, and trench foot.

Hypothermia occurs *w*hen body heat is lost faster than it can be replaced and the normal body temperature (98.6°F) drops to less than 95°F. Hypothermia can occur at cool temperatures (above 40°F), if a person becomes chilled from rain, sweat, or submersion in cold water.

Mild symptoms of hypothermia include an alert worker who may begin to shiver and stomp his or her feet in order to generate heat. As the body temperature continues to fall, symptoms will worsen and shivering will stop. The worker may lose coordination and fumble with items in the hand, become confused and disoriented. He or she may be unable to walk or stand, pupils become dilated, pulse and breathing become slowed, and loss of consciousness can occur.

If you or a coworker is suffering from hypothermia:

- Call 911 in an emergency; otherwise seek medical assistance as soon as possible.
- Move the person to a warm, dry area.
- Remove wet clothes and replace with dry clothes.
- Cover the body (including the head and neck) with layers of blankets and with a vapor barrier (e.g. tarp, garbage bag). Do **not** cover the face.
- If medical help is more than 30 minutes away:
  - Give warm sweetened drinks if alert (no alcohol), to help increase the body temperature.
  - Place warm bottles or hot packs in armpits, sides of chest, and groin.
  - Call 911 for additional re-warming instructions.
- If a person is not breathing or has no pulse:
  - Call 911 for emergency medical assistance immediately.
  - If after 60 seconds the affected worker is not breathing and does not have a pulse, trained workers may start rescue breaths and/or chest compressions per the direction of the 911 operator or emergency medical services.

Frostbite is an injury to the body that is caused by freezing of the skin and underlying tissues. The lower the temperature, the more quickly frostbite will occur. Frostbite typically affects the extremities, particularly the feet and hands.

Symptoms of frostbite include reddened skin with gray/white patches, numbness in the affected part, and the affected part feels firm or hard. In severe cases, blisters may occur.

If a person suffering from frostbite

- Call 911 in an emergency; otherwise seek medical assistance as soon as possible.
- Move the person to a warm, dry area.
- Remove wet clothes and replace with dry clothes.
- Do not rub the affected area to warm it. This action can cause more damage.
- Do not apply snow/water.
- Do not break blisters.
- Loosely cover and protect the area from contact.
- Do not try to re-warm the frostbitten area before getting medical help; for example, do not place in warm water. It is safer for the frostbitten area to be re-warmed by medical professionals.
- Give warm sweetened drinks (no alcohol), if the person is alert.

Trench Foot or Immersion Foot is caused by prolonged exposure to wet and cold temperatures.

Symptoms of trench foot include redness of the skin, swelling, numbness, blisters

If a person suffering from trench foot:

- Call 911 immediately in an emergency; otherwise seek medical assistance as soon as possible.
- Remove the shoes, or boots, and wet socks.
- Dry the feet.

Dressing Properly for the Cold

- Wear at least three layers of loose fitting clothing. Tight clothing reduces blood circulation and prevents warm blood from circulating to the extremities. Layering provides better insulation. Your three layers should include:
  - An inner layer of wool, silk or synthetic (polypropylene) to keep moisture away from the body. These materials hold more body heat than cotton.
  - A middle layer of wool or synthetic to provide insulation even when wet.
  - An outer wind and rain protection layer that allows some ventilation to prevent overheating.
- Insulated coat/jacket (water resistant if necessary)
- Knit mask to cover face and mouth (if needed)
- Hat that will cover your ears as well. A hat will help keep your whole body warmer. Hats reduce the amount of body heat that escapes from your head.
- Insulated gloves (water resistant if necessary), to protect the hands
- Insulated and waterproof boots to protect the feet
- Keep extra clothing (including underwear) handy in case you get wet and need to change

ATTENDEES: <u>Print Name / Signature</u> (use back)

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DATE: _____

SUPERVISOR SIGNATURE:

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JOBSITE / PROJECT:

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