



BIE SAFETY ADVISOR

PROPOSED CHANGE TO OSHA'S INJURY AND ILLNESS ELECTRONIC SUBMISSION

On July 30, 2018 the Occupational Safety and Health Administration (OSHA) issued a [Notice of Proposed Rulemaking \(NPRM\)](#) to eliminate the requirement to electronically submit information from OSHA Form 300 (Log of Work-Related Injuries and Illnesses), and OSHA Form 301 (Injury and Illness Incident Report) for establishments with 250 or more employees that are currently required to maintain injury and illness records. These establishments would be required to electronically submit information only from OSHA Form 300A (Summary of Work-Related Injuries and Illnesses). In addition, OSHA is proposing to require covered employers to submit their Employer Identification Number (EIN) electronically along with their injury and illness data submission.

This proposed rule would amend OSHA's recordkeeping regulation by rescinding the requirement for establishments with 250 or more employees to electronically submit information from OSHA Forms 300 and 301. **These establishments will continue to be required to submit information from their Form 300A summaries.**

OSHA is amending its recordkeeping regulations to protect sensitive worker information from potential disclosure under the Freedom of Information Act (FOIA). OSHA has preliminarily determined that the risk of disclosure of this information, the costs to OSHA of collecting and using the information, and the reporting burden on employers are unjustified given the uncertain benefits of collecting the information. OSHA believes that this proposal maintains safety and health protections for workers while also reducing the burden to employers of complying with the current rule.

OSHA seeks comment on this proposal, particularly on its impact on worker privacy, including the risks posed by exposing workers' sensitive information to possible FOIA disclosure.

If you or your company would like to submit comments on this proposed change, comments must be submitted by September 28, 2018. You may submit comments, identified by docket number OSHA-2013-0023, or regulatory information number (RIN) 1218-AD17, by any of the following methods:

Electronically: You may submit comments electronically at <https://www.regulations.gov/>, which is the federal e-rulemaking portal. Follow the instructions on the website for making electronic submissions;

Fax: If your submission, including attachments, does not exceed 10 pages, you may fax it to the OSHA docket office at (202) 693-1648;

Regular mail, express mail, hand delivery, or messenger/courier service (hard copy): You may submit your materials to the OSHA Docket Office, Docket No. OSHA-2013-0023, Room N-3653, U.S. Department of Labor, 200 Constitution Avenue NW, Washington, DC 20210; telephone: (202) 693-2350 (TTY (887) 889-5627). OSHA's Docket Office accepts deliveries (hand deliveries, express mail, and messenger/courier service) from 10 a.m. to 3 p.m. ET, weekdays.

For specific information on OSHA's Injury and Illness Recordkeeping and Reporting requirements, visit: <https://www.osha.gov/recordkeeping/>



Monthly Toolbox Talk

Dump Truck Safety

This summer there have been a number of incidents involving dump trucks in the Rochester area that highlight the potential danger of working on or around dump trucks or other construction vehicles. While not every incident with heavy equipment is news worthy, it is still important to be alert and aware while operating heavy equipment.

Dump trucks are used in nearly every construction setting. These trucks vary in size and hazard. Dump Trucks present many hazards to both bystanders and operators. These hazards include struck by, tip over, caught in-between, traffic accidents and falls. This tool box talk is designed to cover hazards that operators and bystanders are exposed to and how to control them.

Dump Truck Hazards

- Employees are run over or backed over.
- Driver/worker caught beneath falling dump bed.
- Truck tips when dump bed is raised.
- Truck contacts power lines when bed is raised

Daily Truck Checks

- Perform a 360-degree walk-around.
- Check tire inflation and each lug nut.
- Check windshield cleanliness.
- Check mirror adjustment and cleanliness.
- Check lighting: Headlights, Tail Lights, Backup Lights and Flood Lights.
- Check function lift and lower of dump bed.
- Check tail gate and restraint chains for function.
- Check backup alarm.
- Check brakes and brake air pressure.
- Check seat belt function.

Working With Traffic

- Provide good back-up lighting.
- Provide a back-up alarm.
- Provide yellow (amber) warning lighting.
- Never back without verifying area first.

Operator Protective Equipment

- Wear reflective, high visibility vest
- Wear hard hat when working near equipment
- Wear protective footwear
- Mount first aid kit in truck
- Provide a fire extinguisher (ABC Dry Chemical)
- Provide cones for work near traffic

Backing Dump Trucks

- Never back faster than walking speed
- Use **G.O.A.L.** when a backer is not available
G–Get **O**–Out **A**–And **L**–Look
- Driver and backer should agree on a STOP signal



Dump Truck Backup Tips

- Stand to the side of the vehicle when backing to avoid being run over or caught between the vehicle and an object.
- Use BIG, easy-to-see hand signals.
- Watch your step, don't step into a hole or fall over a trip hazard.
- Always wear a reflective, high-visibility vest or shirt when working in traffic or around moving vehicles.

Dump Truck Best Practices

- Block raised dump bed with a prop rod or heavy block before working beneath it.
- Maintain climbing ladders and steps.
- Provide a grab handle for tilting cab hood.
- Avoid standing atop truck tires to clean cab glass, use an a-frame ladder or tire step.
- Secure tarps when in use or when stored.
- Never raise dump bed on uneven ground.
- Raise dump bed on level surfaces only.
- Check for overhead wires before raising bed.
- Clear workers from area when dumping.
- Use three-point contact when mounting and dismounting.
- Never jump from the cab of the truck.
- Survey area for traffic before exiting cab.

