

Professional Aviation Safety Specialists, AFL-CIO Contract Representative Training



▶ PASS Safety Training Article 54

Safety does not happen by Accident
Accidents happen

Workplace Safety - Article 54

- ▶ Article 54 - General Overview
 - ▶ OSHECCOMs
 - ▶ Training for BUE / Representatives
 - ▶ UCR - Employee Reports of unsafe conditions
 - ▶ WIT - Workplace Safety Inspections
 - ▶ Facility Safety Inspections and similar events
 - ▶ Abatement plans
 - ▶ Contract Representatives
 - ▶ Emergency Response Times



OSHECCOMs

Occupational Safety &
Health Compliance
Committee



Establishment/Field level OSHECCOMs

- ▶ National Charter
- ▶ Membership
- ▶ Duties and functions
- ▶ Meeting documentation - Minutes
- ▶ Issue Papers



- Article 54 – OSHECCOM Occupational Safety Health & Environmental Compliance Committee

- ▶ OSHECCOM Charter



OSHECCOM Charter

Key Points

Definitions:

*d. **Establishment** is a single physical staffed location where Agency business is conducted or where services or operations are performed. Where distinctly separate activities are performed at a single physical location, each activity shall be treated as a separate establishment. Typically, an “establishment” as used in this Charter refers to a field activity, regional office, center, installation, or site.*

*j. **Quorum** means the number and makeup (i.e., Management and Nonmanagement Employees) necessary for a Committee, Subcommittee, or Working Group to make decisions (i.e., vote).*



OSHECCOM Membership

From the National OSHECCOM Charter

9. MEMBERSHIP.

a. OSHA, in 29 CFR 1960, requires each committee to have equal numbers of Management Employees and Nonmanagement Employees who shall be Members of Record. The number of Management Employees will equal the number of Nonmanagement Employees in all committees. All committee members must be FAA employees.

(2) (a) Where employees are represented under collective bargaining arrangements, committee members shall be appointed from among those recommended by the exclusive bargaining representative;



Establishment Committees Duties

From the National OSHECCOM Charter

7. DUTIES and FUNCTIONS.

c. Establishment Committees. The Establishment Committees shall:

(1) Address safety and environmental issues that cross business lines.

(2) Address OSH&E problems unique to their local conditions and facilities through committee activities.

(3) Promote the OSH&E program.

(4) Facilitate the exchange of ideas and information with regard to OSH&E issues.

(5) Send copies of minutes and reports to the Region/Center OSH&E Resource Designee. (Note: Minutes for these committees should be brief summaries of the issues discussed and the recommendations made from those discussions.)

Note :Check for posting on <https://ksn2.faa.gov/env-osh/OSH/OSHECCOM/Home/osheccomhome.aspx>

(6) Help to ensure effective implementation of the OSH&E program.

(7) Brief the appropriate management official(s) after each OSHECCOM meeting as deemed necessary by the committee.

(8) Monitor and assist the safety and health program at the establishment(s) under its jurisdiction and make recommendations to the official in charge on the operation of the program.

(9) Monitor and recommend changes in the level of resources allocated and spent on the OSH&E program and unforeseen issues.

(10) Be informed of all facility safety inspections so that the committee may provide representation during the inspections in order to monitor OSH&E compliance in establishment level facilities through inspection and evaluation of local facilities, equipment, and practices.



Establishment Committees Duties

Continued from National OSHECCOM Charter

(11) Compile reports on OSH&E deficiencies when needed and forward resource requests to the Region/Center OSHECCOM for review and action

(12) Use information collected through the established Safety Management Information Systems (SMIS) to identify unsafe and unhealthful working conditions, and to establish program priorities. All committee members shall be provided information (such as OSHA logs) from this database as requested within the timeframes set by 29 CFR 1904.35.

(12) Use information collected through the established Safety Management Information Systems (SMIS) to identify unsafe and unhealthful working conditions, and to establish program priorities. All committee members shall be provided information (such as OSHA logs) from this database as requested within the timeframes set by 29 CFR 1904.35.

(13) Be afforded the ability to review and provide comments/recommendations on establishment level OSH&E orders, policies, and implementation and guidance documents that affect their area of responsibility.

(14) As requested by the next higher OSHECCOM committee level, review and provide comments/recommendations on new and proposed changes to:

(a) standards proposed pursuant to the provisions of 29 CFR;

(b) FAA OSH&E orders and policies;

(c) FAA Lines of Business and Staff Office OSH&E implementation and guidance documents; and

(d) Region, Center, and Service Area OSH&E orders, policies, and implementation and guidance documents that affect their area of responsibility.



OSHECCOM Minutes

- Minutes should be recorded in the following format

Appendix B
XXXXXX OSHECCOM Minutes

Meeting Date:

ATTENDANCE

Role	Name	Member ()	E/ M	Alt
Chairperson				
Vice-Chairperson				
Coordinator				
Guests				
Role	Name	Purpose		

Quorum Established (Yes/No):

1a. Upcoming Scheduled Workplace Inspections:

Date/Time In-Brief	Date/Time Out-Brief	Date/Time Inspection	Inspector/ Organization	Employee Representative(s)	Facilit

1b. Completed Scheduled Workplace Inspections:

Date/Time In-Brief	Date/Time Out-Brief	Date/Time Inspection	Inspector/ Organization	Employee Representative(s)	Facilit

OSHECCOM Minutes Agenda

- Attendance
- Scheduled WIT Inspections
- Completed WIT Inspections
- Abated/Unabated WIT issues
- Abated/Unabated UCR issues
- UCR Inspections and Closed reports
- Status of Employee OSH Training
- Status of Issue Papers
- Scheduled Meetings
- Employee Safety training oversight

Example of Minutes



Long Beach
OSHECCOM

Example of Training status

Training	Timeframe	MGT	Emp 2	Emp 3	Emp 4	Emp 5	New Hire	Emp 7	Emp 8
Aerial Lift	Initial								2017
Hearing Protection	Annual								
Electrical Safety	Every 3 yrs							2017	2017
Climbing	Every 2 yrs	10/2019							
Rescue Climber	Every 2 yrs Annual Comp								
Competent Climber	Every 2 yrs								2017
Asbestos refresher	Every 2 yrs								
Snow Cat	n/a	2004				2015		2004	2004
Snow Survival	n/a	2004						2004	2004
Quad	n/a					2017			
Forklift	Every 3 yrs	2017						2017	2018
CPR	Every 2 yrs	10/2019							10/2019



OSHECCOM Issue Paper

Issue Paper Format

Provide the following information based on your knowledge of the issue.

DATE: _____

SUBMITTED BY:

Name Organization Phone
(If the issue is being submitted by a Region, Organization, etc. provide a contact and a phone number.)

ISSUE: _____

BACKGROUND (Provide a brief history on the issue. Give dates and other specifics, when appropriate.)

FACTS BEARING ON THE ISSUE (Provide specific supporting facts in bullet format.)

RECOMMENDATIONS (Provide specific, detailed recommendations)

ANTICIPATED BENEFITS (such as any organizational, financial, schedule and/or other benefits; include any quantifications)

ANTICIPATED IMPACTS (such as any organizational, financial, schedule and/or other impacts; include any quantifications)

Writing issue papers

- Employees with Lift training
- Competent Climbers availability
- LOTO reviews
- Vehicle safety training
- Emergency Service availability at remote worksites
- Arc flash Reviews
- ADA compliance
- Security

Utilizing the issue paper format allows unresolved issues to be elevated to the next level OSHECCOMs.



Training for Article 54

OSHECCOM

- ▶ Intro to OSHA for other Federal Agencies – ELMS FAA68000342 OSHA 6008
 - ▶ 9-hour course – completed within 6 months of being assigned.
- ▶ OSHECCOM Supplemental – ELMS FAA30200202
 - ▶ 2-hour course – completed within 6 months of being assigned.
- ▶ OSHECCOM Refresher Training ELMS FAA30200973
 - ▶ 1 hour course required every 2 years after completion of FAA30200202

Contract Representative 29 CFR 1960.59 (b); CBA Art 54 Sect 1g

- ▶ OSHA 6005 – Collateral Duty Course for Other federal Agencies
 - ▶ Instructor led 22.5-hour class with a Mock inspection
- ▶ Specialized training



UCR Unsatisfactory Condition Report





Unsatisfactory Condition Report

- ▶ Employee reports suspected hazard by filing UCR or notifying management in a verbal report.
- ▶ Time limits for the FAA to investigate:
 - 24 hours if imminent danger
 - 3 days if potentially serious condition
 - 20 days for other than serious safety and health conditions
- ▶ Employee provided decision within 15 days of investigation.
 - ▶ Validated - management agrees it's a valid safety issue.
 - ▶ Unvalidated - Not a viable safety issue, management closes UCR.
- ▶ Abatement plan - if not closed within 24 hrs, 3 days or 20 days depending on the level of finding, outlines the mitigation, expected time of abatement and cause of delay **29 CFR 1960.30**
- ▶ All reports, notices and abatement plans shall be sent to appropriate Establishment OSHECCOM Committee.

WEBSITE <https://smis.faa.gov/>

UCR Submittal

What is a workplace safety issue?

- Safety issues identified in JAI
- Electrical installation – electrical code violations
- Confined space – not identified or no procedures
- Facility Egress – not identified or limited egress
- Climbing – procedures, devices, training, equipment
- Safety Training – CPR, EQSP, Climbing, Lift, offroad, boat, snowcat, high voltage,
- Slip Trip and Falls – broken sidewalk, pipes, unprotected edge, ice.
- Water testing – completion/out of tolerance levels
- Safety Signage – ACM, Hearing, Lead, Do not climb
- Air quality – mold, sewer, engine exhaust
- Equipment safety issues

The screenshot shows the SMIS (Safety Management Information System) interface. At the top, there's a header with the SMIS logo and the text "SAFETY MANAGEMENT INFORMATION SYSTEM". Below the header, there's a navigation bar with links: Home, What's New, Forms, Links, and Support. The main content area displays the "Unsatisfactory Condition Report" form. The form includes instructions: "Instructions: Complete all applicable items. All items that are highlighted are mandatory fields. Form OA1800-1". There are buttons for "Submit", "Add Attachment", and "Reset". The form fields are numbered 1 through 20. Fields 1 through 17 are highlighted in yellow, indicating they are mandatory. Field 18 is a dropdown menu. Fields 19 and 20 are text areas with a character limit of 1500 characters. The form is titled "Unsatisfactory Condition Report".

SMIS
SAFETY MANAGEMENT INFORMATION SYSTEM

• Home • What's New • Forms • Links • Support

Instructions: Complete all applicable items. All items that are highlighted are mandatory fields.
Form OA1800-1

Submit Add Attachment Reset

Unsatisfactory Condition Report

1. Record Number
411228128

2. Submitter Name (First, Middle, Last)
First [] Middle [] Last [] ☐ Anonymous

3. Submitter Email (e.g. xxx@faa.gov)
[]

4. Submitter Region
[]

5. Submitter LOB
[]

6. Facility Type
[]

7. Location ID
[]

ATS District [] Tech Ops District []

8. Submitter Service Area
[]

9. Submitter Service Location
[]

10. Resolver Service Location
[]

11. Supervisor at this Location - Name (First, Middle, Last)
First [] Middle [] Last []

12. Discussed w/Sup On (e.g. mm/dd/yyyy)
[]

13. Supervisor Email (e.g. xxx@faa.gov)
[]

14. Condition Report Field
[]

Equipment Name []

15. Observation Date (e.g. mm/dd/yyyy)
[]

16. Office Address
[]

17. Date Submitted
4/11/2022

18. OSH Related?
[]

19. Describe Unsatisfactory Condition (You may enter up to 1500 characters)
[]

20. Proposed Solution (You may enter up to 1500 characters)
[]

UCR – Choosing risk category

OSH Hazard Risk Assessment Matrix		Severity				
		A	B	C	D	E
Probability	I	1	1	2	3	3
	II	1	2	2	3	3
	III	2	2	3	4	4
	IV	3	3	4	4	5
	V	3	3	4	5	5

OSH Standards Conversion of Risk Assessment:
 Imminent Danger - Risk Assessment Level 1 (Red)
 Serious Danger - Risk Assessment Level 2 (Orange)
 Other Than Serious - Risk Assessment Levels 3, 4 and 5

Severity Category

- A - Catastrophic** - May result in death or permanent disability of employee, total loss of facility, and/or irreversible environmental impact.
- B - Hazardous** - May result in severe injury or occupational illness of employee, severe property damage, and/or severe or long-term environmental consequences.
- C - Moderate** - May result in recoverable injury or occupational illness of employee, significant property damage, and/or significant but reversible environmental consequences.
- D - Minor** - May result in first aid level injuries or occupational illness of employee, minor property damage, and/or slight, brief and totally correctable environmental consequences.
- E - Negligible** - Minimal threat to employees, property, and/or environment, but still a violation of cited standard.

- I. Frequent** - Likely to occur immediately or very often during the lifetime of the facility/equipment.
- II. Probable** - Likely to occur soon or several times during the lifetime of the facility/equipment.
- III. Occasional** - Likely to occur at some point in the lifetime of the facility/equipment.
- IV. Remote** - Unlikely but possible to occur during the lifetime of the facility/equipment.
- V. Improbable** - Highly unlikely to occur during the lifetime of the facility/equipment.

SMIS
SAFETY MANAGEMENT INFORMATION SYSTEM

Home What's New Forms Links Support

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Unsatisfactory Condition Report

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2. Submitter Name (First, Middle, Last): First [] Middle [] Last [] ☐ Anonymous

3. Submitter Email (e.g. xxx@faa.gov): []

4. Submitter Region: []

5. Submitter LOB: []

6. Facility Type: []

7. Location ID: []

8. Submitter Service Area: []

9. Submitter Service Location: []

10. Resolver Service Location: []

11. Supervisor at this Location - Name (First, Middle, Last): First [] Middle [] Last []

12. Discussed w/Sup On (e.g. mm/dd/yyyy): []

13. Supervisor Email (e.g. xxx@faa.gov): []

14. Condition Report Field: []

15. Observation Date (e.g. mm/dd/yyyy): []

16. Office Address: []

17. Date Submitted: 4/11/2022

18. OSH Related?: ☒ Yes

19. Describe Unsatisfactory Condition: []

20. Proposed Solution: []

EOSH Hazard Categories: []

Risk Severity: []

Risk Probability: []

Risk Assessment: []

Describe Unsatisfactory Condition:

- Electrical
- Emergency Exit in ATCT
- Environmental
- Fall Protection
- Fire Protection
- General Environmental Controls
- Hand/Power Tools
- Hazardous Materials
- Machinery and Machine Guarding
- Material Handling and Storage
- Means of Egress
- Medical and First Aid
- Mold Implementation
- Occ. Health and Environmental
- Other
- Personal Protective Equipment
- Programmatic
- Recordkeeping
- Toxic and Hazardous Substances
- Vehicles
- Walking-Working Surfaces
- Welding, Cutting, and Brazing

Risk Severity:

- A - Catastrophic
- B - Hazardous
- C - Moderate
- D - Minor
- E - Negligible

Risk Probability:

- I - Frequent
- II - Probable
- III - Occasional
- IV - Remote
- V - Improbable

UCR Description

Description – General based information on the suspected issue. This can be assisted by photos, documents, or other attachments. The submitter is not required to submit exact reference code. Reviewer will validate the information and determine if it is a safety issue.



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SAFETY MANAGEMENT INFORMATION SYSTEM

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12. Discussed w/Sup On (e.g. mm/dd/yyyy)
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13. Supervisor Email (e.g. xxx@faa.gov)
[]

14. Condition Report Field
[]

Equipment Name
[]

15. Observation Date (e.g. mm/dd/yyyy)
[]

16. Office Address
[]

17. Date Submitted
4/11/2022

18. OSH Related?
[]

19. Describe Unsatisfactory Condition (You may enter up to 1500 characters)
[]

20. Proposed Solution (You may enter up to 1500 characters)
[]

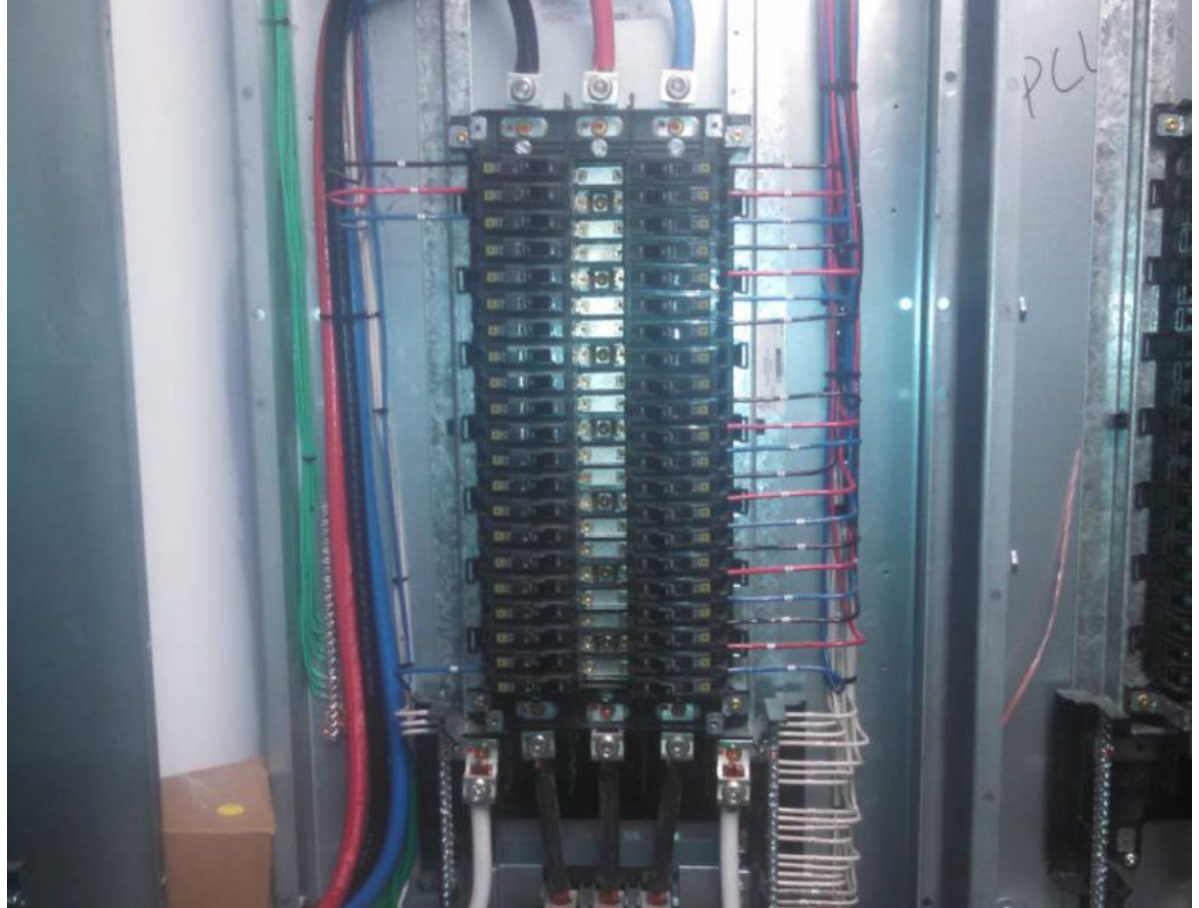
What Level of Hazard?

- Imminent A1
- Trenches greater than 5' need shoring unless made with stable rock



What Level of Hazard?

- Imminent
- Must be guarded at all times, an open panel



What Level of Hazard?

- Imminent
- Worker exposed to fall greater than 4'



What Level of Hazard?

- Serious
- Unguarded fall hazard / broken guard rail



What Level of Hazard?

- Imminent

Is there a confined space plan

Has space been tested for
Oxygen and flammable gases



What Level of Hazard?

- Serious

Item is not listed for commercial use. UL listed for residential use only.



What Level of Hazard?

- Imminent

Outlets near 6 feet of water source must be on GFCI



What Level of Hazard? Signage

- Other

Faded Signage, capacity required



What Level of Hazard?

- Other

MSDS is expired; Update to SDS with 16 sections. 29 CFR 1910.1200

DATE PREPARED: 10/31/2000

MSDS No: 7071

Roundup® Weed & Grass Killer Concentrate

1. PRODUCT AND COMPANY IDENTIFICATION

PRODUCT NAME: Roundup® Weed & Grass Killer Concentrate

PRODUCT DESCRIPTION: HERBICIDE

MANUFACTURER

Monsanto Company
Lawn & Garden Products
P.O. Box 1750
Columbus, OH 43216

24 HR. EMERGENCY TELEPHONE NUMBERS

Emergency Phone: 1-800-225-2883

EPA REG. NO.: 71995-26 **PN:** 7038

2. COMPOSITION / INFORMATION ON INGREDIENTS



What Level of Hazard?

- Serious

1926.416(e)(1)

Worn or frayed electric cords or cables shall not be used.



Risk Category Example - *Imminent*

- ▶ Workers in Trench depth greater than 5'
- ▶ Exposed electrical connections
- ▶ Unprotected Climbing at heights
- ▶ ACM Exposure
- ▶ Lethal gas exposure



Risk Category Example - *Serious*

- ▶ Electrical Box Cover missing
- ▶ Expired PPE
- ▶ Blocked Egress
- ▶ LOTO incomplete
- ▶ Guard Rail incorrect height
- ▶ Broken sidewalk trip hazard
- ▶ Improperly wired GFCI
- ▶ Exposed wires in extension cord
- ▶ Old MSDS sheets.
- ▶ Incomplete Rescue Plan



WIT – Workplace Safety Inspections

- ▶ Performed by EOSH Services, SECM, NISC, or Front-line manager
- ▶ All Facilities require annual inspection - 29 CFR 1960.25
- ▶ Contract rep is required to receive written notice unless it is unscheduled, then notice as soon as practicable - Art 54
- ▶ Read only Access to WIT (Agencies Workplace inspection tool) <https://eoshwit.faa.gov>
- ▶ Access to all safety reports IAQ, Water quality, Lead and Asbestos sample collection, accident reports upon request
- ▶ Travel and per diem to participate in safety inspections
- ▶ Representative is allowed to actively participate in inspections without hindering inspectors' ability to complete inspection
- ▶ Posting of findings at the facility for employee notification
 - ▶ *1960.26(c)(4) Each notice of an unsafe or unhealthful working condition, or a copy thereof, shall remain posted until the unsafe or unhealthful working condition has been abated or for 3 working days whichever is later. A copy of the notice will be filed and maintained for a period of five years after abatement at the establishment and made available to the Secretary upon request.*



WIT Inspection 3900-2 record / Abatement plan Example

U.S. Department of Transportation
Federal Aviation Administration

OCCUPATIONAL SAFETY AND HEALTH INSPECTION REPORT

Workplace Inspected ASE RCAG	Unit Number	Date of Inspection 08-Feb-2022	
To: Facility Safety and Health Manager SETH BLAKE		From: Inspector Chad Brown FAA WSC QCG EOSH Occupational Safety and Health Specialist	
Management Representative Aaron Steinmetz		Employee Representative Donald Gilbert	
<p>Unsafe or unhealthful working conditions which are identified during inspection and which do not comply with FAA adopted safety and healthy standards (including standards by the Occupational Safety and Health Administration) should be described below. Abatement dates should be noted for each deficiency listed. Where all deficiencies identified below will be corrected within 30 working days from the date of inspection. The inspection report (FAA Form 3900-2) may serve as the Notice of Unsafe or Unhealthful Condition (FAA Form 3900-1).</p>			
Standard or Regulation Cited	Description of Condition	Planned Abatement Date	Abatement Date
29 1910 E 37(a)(4)	<p>Safeguards designed to protect employees, including fire alarm systems, sprinklers, fire doors, and exit lighting are not in proper working order.</p> <p>Finding - #276355: in EG room the emergency lighting system is inoperable</p> <p>Corrective Action: Repair or replace emergency lighting system.</p>	07-Mar-2023	
29 1910 E 37(b)(6) & (7)	<p>Exits are not marked, and/or exit signs are not visibly illuminated and/or exit signs do not have the word "EXIT" with letters at least 6" high.</p> <p>Finding - #276344: No Exit Sign present for facility</p> <p>Corrective Action: Procure and install proper exit signage in facility.</p>	07-Mar-2023	
29 1910 H 106(d)(3)(ii)	<p>Flammable and combustible liquids are not stored in compliant metal flammable cabinets.</p> <p>Finding - #276349: 3 Flammable items stored outside approved storage locker</p> <p>Corrective Action: Items have been removed from facility and stored in an approved flammable storage location</p>	07-Apr-2022	07-Mar-2022
29 1910 S 303(b)(2) OSHA Interpretation Letter, 2002, 1910.303(b)(2), Compliance Requirements for Relocatable Power Taps or "Power Strips"	<p>Temporary electrical power and lighting wiring methods are currently being used when not allowed in place of permanent fixed wiring.</p> <p>Finding - #276346: Microwave plugged into surge protector</p>	07-Apr-2022	07-Mar-2022

U.S. Department of Transportation
Federal Aviation Administration

ABATEMENT PLAN ABATEMENT OF UNSAFE AND UNHEALTHFUL CONDITIONS

Unsafe or unhealthful working conditions which are identified during inspection and which do not comply with FAA adopted safety and healthy standards should be corrected within 30 calendar days from the date of inspection. This form serves as an abatement plan for corrections that cannot be completed within 30 days.

To:

From:

Date of Hazard 08-feb-2022	Hazard Location ASE RCAG
Hazard Description No Exit Sign present for facility	
<p>Risk assessment Level (check one) Based on estimated hazard severity and estimated accident probability</p> <p><input type="checkbox"/> Level 1 = Severe and imminent threat to life, property and/or environment. Immediate actions must be taken to safeguard employees and facilities. Highest risk, highest priority.</p> <p><input type="checkbox"/> Level 2 = Serious or likely threat to safety, health, property and/or environment. Immediate actions must be taken to safeguard employees and facilities. High risk, high priority.</p> <p><input checked="" type="checkbox"/> Level 3 = Moderate threat to safety, health, property and/or environment. Prompt actions should be taken to mitigate hazard. Moderate risk, moderate priority.</p> <p><input type="checkbox"/> Level 4 = Slight or unlikely threat to safety, health, property and/or environment. Actions should be taken to mitigate hazard in line with other priorities. Low risk, low priority.</p> <p><input type="checkbox"/> Level 5 = Generally in the nature of a technical violation of a standard with little or no real-world impact. Actions should be taken to correct finding to achieve compliance. Lowest risk.</p>	
Interim Control Measures Inform technicians of hazard.	
Planned Corrective Actions Procure and install proper exit signage in facility.	
Estimated Cost 50.00	Estimated Completion date 07-Mar-2023
(Complete the remaining boxes when the abatement is completed)	
Actual Corrective Actions	
Actual cost	Actual Completion Date

30-Mar-2022

Abatement Plans – Must include

Reason for delay – Funding, location, personnel etc.

Anticipated time hazard will be closed.

Interim Control Measures



29 CFR 1960.30(c)

- ▶ The official in charge of the establishment shall promptly prepare an abatement plan with the appropriate participation of the establishment's Safety and Health Official or a designee, if in the judgment of the establishment official the abatement of an unsafe or unhealthful working condition **will not be possible within 30 calendar days**. Such plan shall contain an explanation of the circumstances of the delay in abatement, a proposed timetable for the abatement, and a summary of steps being taken in the interim to protect employees from being injured as a result of the unsafe or unhealthful working condition. A copy of the plan shall be sent to the safety and health committee, and, if no committee exists, to the representative of the employees. Any changes in an abatement plan will require the preparation of a new plan in accordance with the provisions of this section.

Abatement Plan – Reason for Delay

If the listed hazard is not removed within 30 calendar days.

The abatement plan must include:

Reason for delay

- ▶ Funding
- ▶ Location - actually only for extremely remote sites
- ▶ Staffing availability



Abatement Plan – Anticipated Time

- ▶ Anticipated time hazard will be closed.
- ▶ This date is subjective based on the type of hazard. As the local rep that timetable question would be
 - ▶ Does it take 1 year to purchase and post signage; is the time requested reasonable
 - ▶ Is the resolution sound – i.e. space around electrical equipment – “purchase new building”



Abatement Plan - Interim Control Measures

Using the Hierarchy of controls does it mitigate the hazard

- ▶ Elimination / Substitution
- ▶ Engineering controls
- ▶ Administrative control
- ▶ PPE



Contract Representatives and Point of Contacts

OSHECCOM Regional Committees



Regions are Listed above

Regional Union Reps

Alaska - AAL – Douglas James Ward

Central - ACE – Marlon Patterson

Eastern - AEA – Francis Klotz

Great Lakes – AGL Shaun Cooper

New England – ANE – VACANT

Northwest Mountain – NWM – David Juhola

Southern – ASO – Bobby Gene Cannon

Southwest – ASW -Timothy Lindsey

Western Pacific – AWP – Arnold Damo

AAL ROSHER Scott Brown, CTR, 907-269-1387

ACE ROSHER Brian Hand, CTR, 816-329-3618

AWA ROSHER Bruce McMullan, CTR, 202-646-2244

AGL ROSHER John Neil, CTR, 847-294-8551

ANE ROSHER Bill Williams, CTR, 781-238-7853

ANM ROSHER William Vosler, CTR, 425-227-2036

ASO ROSHER Bob Keown, CTR, 404-641-1571

ASW ROSHER Giselle Sylveste, CTR, 281-352-8543

AWP ROSHER Wayne Lynch, CTR, 310-725-7432

AEA ROSHER Noah Newman, CTR, 516-236-3732



Contract Representative designation



- ▶ National Representative – Ron Pevehouse – 80 hours official time per CBA
- ▶ Regional Rep – 9 regions in the FAA
 - ▶ AAL – Douglas Ward AEA – Francis Klotz ACE – Marlon Patterson
 - ▶ AGL – Shaun Cooper ANM – David Juhola ASO – Gene Cannon
 - ▶ ASW – Tim Lindsey AWP – Arnold Damo ANE – VACANT
- ▶ Official time for Regional Reps is as needed for participation in official duties. Duties will include Regional OSHECCOM, research and evaluation of Agency safety orders, national Consensus standards, Agency Training, site visits, assist local representatives with safety issue in the workplace and outside safety training.
- ▶ Local Safety Representative – Designated by Regional Safety Representative. May not be the same as designated contract representative, by default is assigned to the elected representative.

Article 54: OSHECCOMs Overview



- ▶ Agenda Items
- ▶ WIT Workplace inspection - mitigation, abatement, and schedule.
- ▶ UCR's Unsatisfactory Condition Report - Validation, mitigation, and abatement
- ▶ Employee Safety training - upcoming, needed, and expiring
- ▶ Minutes - send minutes to Designated Regional ROSHER
- ▶ Abatement Plans

Facility Emergency Response

- ▶ What is the OSHA Rule that mandates workers not being alone at remote locations?
- ▶ What is Remote?



Facility Emergency Response Requirements

1910.151(b)

- ▶ In the absence of an infirmary, clinic, or hospital in near proximity to the workplace which is used for the treatment of all injured employees, a person or persons shall be adequately trained to render first aid. Adequate first aid supplies shall be readily available.

What is OSHA's Interpretation of response time: (*letter of interpretation* dtd 6/19/2019 to DHS)

In workplaces where serious accidents such as those involving falls, suffocation, electrocution, or amputation are possible, emergency medical services must be available within 3-4 minutes, if there is no employee on the site who is trained to render first aid...While the standards do not prescribe a number of minutes, OSHA has long interpreted the term "near proximity" to mean that emergency care must be available within no more than 3-4 minutes from the workplace, an interpretation that has been upheld by the Occupational Safety and Health Review Commission and by federal courts...The basic purpose of these [first aid] standards is to assure that adequate first aid is available in the critical minutes between the occurrence of an injury and the availability of physician or hospital care for the injured employee... Medical literature establishes that, for serious injuries such as those involving stopped breathing, cardiac arrest, or uncontrolled bleeding, first aid treatment must be provided within the first few minutes to avoid permanent medical impairment or death...OSHA recognizes that a somewhat longer response time of up to 15 minutes may be reasonable in workplaces, such as offices, where the possibility of such serious work-related injuries is more remote.



Facility Emergency Response Requirements

- ▶ What does this mean in regard to remote facilities?
- ▶ Is there specifics on type of work performed?
- ▶ What limitations does this give for facilities outside the 3-to-4-minute response times?
- ▶ Does this apply to some locations on the airfields with controlled access and specific route requirements?
- ▶ Can we utilize other employers to satisfy the First Aid/CPR requirements?

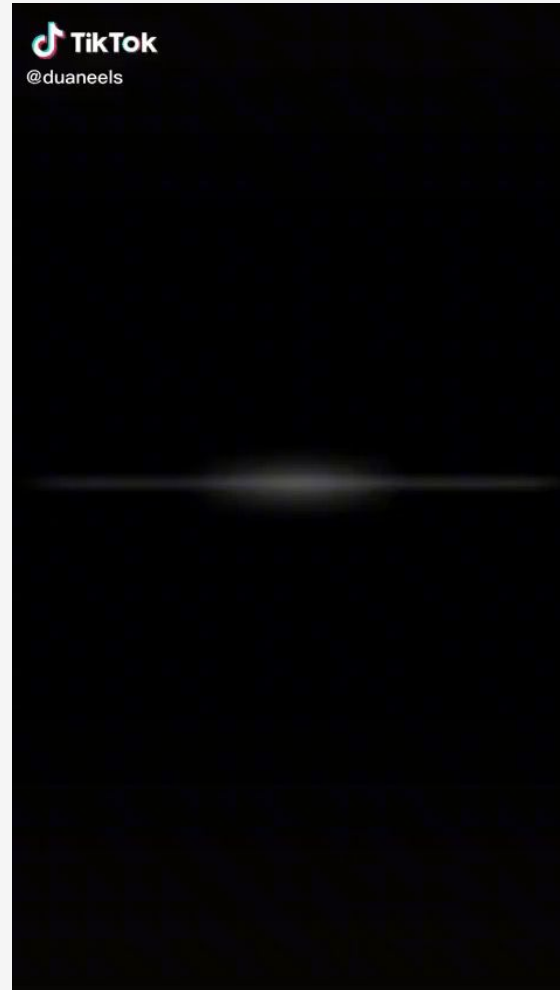
Your Regional Safety Representative can help draft the grievance for this issue



QUESTIONS?



Workplace Safety Videos



Lightning Protection



Ladder Safety