J. J. Keller® EH&S Consulting Services

EH&S General Industry Compliance Requirements



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Topic	Requirements	How we can help	Additional Services
Walking-Working Surfaces / Fall Protection (29 CFR 1910.2130 and 1910.140)	 Inspect all walking-working surfaces regularly and as necessary. Provide fall protection if workers are exposed to falls of four feet or more. A qualified person must train workers who use personal fall protection systems or otherwise require training under these standards. 	 Evaluate your facility for hazards and potential compliance concerns. Help develop an inspection schedule and inspection tracking system. Provide resources for use during employee training. We can train your team on WWS/Fall Protection hazard recognition and on how to perform hazard evaluations and assessments. We can assist in developing and creating written policies and procedures. 	
Exit Routes (29 CFR 1910.3637)	 Ensure all exits are marked, and that exit routes are clear and adequately lighted. The number of exits and the exit route capacity must be adequate. Exit routes must meet minimum height and width requirements. 	 Evaluate your facility for hazards and potential compliance issues. Provide resources for marking exit routes. We can assist in developing and creating written policies and procedures. 	
Emergency Action Plan (29 CFR 1910.38)	Develop an emergency action plan and train designated employees to assist with safe and orderly evacuation of other employees during an emergency.	 Help develop a written Emergency Action Plan. Distribute copies of the completed plan to appropriate agencies. Help establish an on-site Emergency Response Team (ERT) of designated employees who assist during emergencies. Provide employee awareness training. Facilitate and Evaluate on-site fire drills. 	

the plan.

6. Assist in the required annual review of

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Requirements

Additional Services

Hearing Conservation (29 CFR 1910.95)

- 1. Determine the levels of occupational noise exposure.
- 2. Develop, implement, and maintain a written hearing conservation program where noise exposure exceeds the action level.
- 3. Provide training for covered employees, with annual refresher training.
- 4. Provide annual hearing tests for covered employees.

1. We can conduct initial and follow up industrial hygiene noise monitoring and testing of your workplace.

How we can help

- 2. Using the industrial hygiene noise testing results we can determine if the Hearing Conservation standard applies.
- 3. Create and implement a written Hearing Conservation program and policies.
- 4. Develop a point-in-time noise map of your facility.
- 5. Train employees.
- 6. Assist with reviewing audiogram results.
- 7. Help select proper hearing protection and identify areas where it is required.

2. Provide basic guidance and options to

begin discussions for bringing your site

determine if the regulation applies to you.

1. Conduct an initial assessment to

into compliance, if needed.

Assist with Time Weighted Average (TWA) noise testing.

Process Safety Management of Highly **Hazardous Chemicals** (29 CFR 1910.119)

- 1. Take steps to prevent or minimize the consequences of catastrophic releases of toxic, flammable, or explosive chemicals.
- ongoing management of the program.
- 3. Audit the program at least every 3 years.
- 4. Provide employee training, with refresher training at least every 3 years.
- 1. Conduct an assessment to determine if the Hazwoper regulation applies based on expected employee responses to emergencies.
- 2. Help identify the level of training required based on your personnel response duties.
- 3. Provide resources for creating an emergency response plan.

Hazardous Waste Operations and **Emergency Response** (HAZWOPER) (29 CFR 1910.120)

- 2. Establish a written Process Safety
- Management (PSM) program and provide
- 1. Train employees who are expected to respond to spills beyond incidental releases, even if response is limited to calling authorities.
- 2. Develop, implement, and maintain a written emergency response plan.

Topic	Requirements	How we can help	Additional Services
Personal Protective Equipment (29 CFR 1910.132138)	 Evaluate each job for hazards and potential hazards that may require PPE, and certify in writing that this was done. Review and adopt controls for each hazard, where feasible. Implement and maintain a personal protective equipment program. Select appropriate PPE and train employees in the use and care of PPE. 	 Conduct an assessment to determine if the HAZWOPER regulation applies based on expected employee responses to emergencies. Help identify the level of training required based on your personnel response duties. Provide resources for creating an emergency response plan. 	
Respiratory Protection (29 CFR 1910.134)	 Determine the concentration of airborne chemicals to which employees are exposed. Implement engineering or administrative controls where levels exceed required thresholds. Develop and implement a written respiratory protection program with worksite-specific procedures for required respirator use. Provide initial training and fit testing, plus annual retraining and fit testing. Provide an initial medical evaluation for each employee required to use a respirator. 	 Identify need for testing and assist with an industrial hygiene survey. We can perform industrial hygiene air and atmosphere testing to determine known or potential airborne hazards. Develop a written respiratory protection program and policy covering both mandatory and voluntary respirator use. Assist with initial and annual training on the use of respiratory protection. Assist with fit testing employee as needed. Help with the completion the OSHA Respirator Medical Evaluation Questionnaire forms. 	Assist with performing air testing.
Permit Required Confined Spaces (29 CFR 1910.146)	 Assess your facility to identify any permit-required confined spaces. Inform employees of any permit spaces and the dangers. Develop and implement a written permit space program with procedures for preparing and issuing entry permits. Retain entry permits and review the program within one year after entry. Train affected employees as required, based on their duties. 	 Provide an initial site confined space assessment. Develop a confined space entry program with a permit system. Perform confined space entry training for authorized employees. Conduct periodic awareness training for all employees. Help select appropriate air monitoring, ventilation, and emergency equipment. Assist in evaluating options for emergency procedures. 	

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Topic	Requirements	How we can help	Additional Services
Control of Hazardous Energy (Lockout/Tagout) (29 CFR 1910.147)	 Create a lockout/tagout program for machine maintenance, cleaning, or adjusting to protect workers from hazardous energy. Develop specific procedures for each machine or type of machine. Train employees, including those who work in areas where lockout/tagout procedures are used; retrain as needed. Conduct periodic inspections of procedures with authorized employees. 	 Help develop your written lockout/tagout program. Assist with selecting lockout/tagout equipment and materials. Assist with training of affected and authorized employees. Perform a formal audit of your program and procedures. Establish a system for conducting periodic and annual written procedure inspections and evaluations. 	Help develop Lockout/ Tagout procedures for specific machines as needed.
Portable Fire Extinguishers (29 CFR 1910.157)	 Conduct monthly and annual inspections of all portable extinguishers. For employees expected to use fire extinguishers, provide initial training and annual refresher training on safe use. 	 Perform a fire extinguisher needs assessment. Assist with annual classroom fire extinguisher training. We can assist in developing and creating written policies and procedures. 	
Powered Industrial Trucks (29 CFR 1910.178)	 Train and evaluate each operator on the type of equipment to be used. Provide refresher training as needed. Evaluate each operator's performance at least once every three years. Operators conduct equipment inspections prior to every shift. 	 Develop a written Powered Industrial Truck program and policy. Provide formal classroom and operator proficiency evaluation training. Help develop tools for practical training and evaluating operator performance. Assist in setting up of an equipment inspection program. 	Carbon Monoxide emission testing services are also available.
Overhead and Gantry Cranes (29 CFR 1910.179)	Establish a formal program for inspecting all hoist cranes on a frequent (daily to monthly) and periodic (monthly to annually) basis.	 Develop a written program and policy to assist in the completion of General Industry crane and hoist inspections. Provide employee crane and hoist awareness-level safety training for required crane and hoist inspections. 	

Additional Services Requirements How we can help **Topic** Machine Guarding 1. Guard all points of operation, ingoing nip 1. Conduct an initial site machine guarding (29 CFR 1910.212) points, and rotating parts. needs assessment. 2. Anchor machines to prevent movement. 2. We can assist you in verifying your machines which require guards are properly guarded and/or anchored. 3. We can provide your employees machine quarding safety training. 4. We can assist in developing a written machine quarding program and policy. **Bloodborne Pathogens** 1. Identify employees with occupational 1. Develop your BBP Exposure Control Plan (29 CFR 1910.1030) exposure (exposure determination). and policies. 2. Create a written Exposure Control Plan. 2. We can train employees who have occupational exposure (and other 3. Review and update the Exposure Control employees, if desired). Plan at least annually. 3. Help obtain spill response kits and 4. Train covered employees, and provide equipment for dealing with annual refresher training. contaminated sharps and regulated 5. Offer hepatitis B vaccine to employees medical or BBP clean-up waste. with occupational exposure. 4. Provide documentation materials for administering and tracking hepatitis B vaccinations.

Hazard Communication Program (29 CFR 1910.1200)

- 1. Create a written hazard communication program.
- 2. Train employees on hazardous chemicals in their work areas.
- 3. Implement a hazardous chemical container labeling system.
- 4. Maintain a Safety Data Sheet (SDS) for each chemical, accessible to employees.

1. We can assist in the developing, implementation, and maintaining of your hazard communication program and labeling system.

- We can train your employees as required on chemical specific safety as well as on your company's specific HazCom/GHS program or policy.
- 3. We can Deliver refresher training as needed to ensure retention of information (not required, but usually necessary).
- 4. Help manage your SDS and chemical list database.

Online SDS service.

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Topic	Requirements	How we can help	Additional Services
Ergonomics (No current federal OSHA standard)	Although federal OSHA does not have an ergonomic standard, the agency uses the General Duty Clause for recognized hazards likely to cause serious injuries. Employers should consider ergonomic issues when setting up work areas and evaluating job hazards.	 We can provide training on ergonomic and safe lifting/back injury prevention. Help identify tasks that involve high risk factors for ergonomic disorders. Assist in conducting Job Safety Analyses and help identify controls to reduce ergonomic risk factors. Generally, a team of employees at the facility will help complete these evaluations. We can assist your operation in developing a formal written Ergonomic Safety Program and policy. 	
Accident Prevention Program/ Safety Committee (No current federal OSHA standard)	Developing an Accident Prevention Program is a recommended best practice, and creating an active Safety Committee can help identify hazards and reduce accidents. Some state-plan states require injury prevention programs.	 We can develop a site-specific injury and illness prevention program specific to your operation. We can assist your operation to establish goals and objectives to measure safety performance. Audit the program to determine effectiveness. Meet with your Safety Committee or ERT to discuss the program and safety topics. Help implement a walk-though inspection process to identify potential hazards and violations. 	
Recording and Reporting Occupational Injuries and Illnesses (29 CFR Part 1904)	 Create and maintain an OSHA 300 Log for each location (establishment). Complete an OSHA 301 Form, or equivalent, for each recordable incident. Report any death, hospitalization, amputation, or loss of an eye within 	 Review your 300 Log to verify that it is properly maintained. We can train your personnel on the proper completion of the OSHA 300 Log and related documentation forms, as needed. We can provide in-depth recordkeeping 	Offer guidance on when a case must be recorded on the 300 Log.

OSHA/Worker Safety Compliance Summary Disclaimer

This form is based on Federal OSHA regulations and is only a summary of the requirements. For a detailed explanation of the requirements, please refer to the actual Code of Federal Regulations (CFR) and consult with your specific state or municipality since they may have more stringent compliance requirements. Assistance may vary based upon the product and services purchased.

and 300 Log assessments and audits to

determine if your program has gaps.

4. Post the OSHA 300A Annual Summary by

required time frames.

February 1 each year.

IDENTIFY & REDUCE WORKPLACE RISKS

WITH HELP FROM THE SAFETY EXPERTS

J. J. Keller's *EH&S Consulting Services* give you a dedicated Consultant who will assess your compliance levels and overall employee safety, then deliver continued oversight and assistance to reduce your risks.



Services include:

- Dedicated world-class expert
- Ongoing onsite assessments and training
- Custom safety plan
- Comprehensive audit protection
- Unlimited regulatory support via phone and email
- Policy and procedure development

And you can get all of this at a predictable monthly expense with no hidden fees. It's the industry's most in-depth approach for improving safety and compliance.

Partner with J. J. Keller

We put over 67+ years of industry experience and 17,000+ products and services at your disposal to help you:

- Reduce accidents and liability
- Control insurance premiums
- Lower workers' comp costs
- Avoid costly violations
- Adopt industry best practices
- Ensure regulatory compliance
- Prevent negative brand exposure
- Leverage industry knowledge and experience

95%

That's the percentage of clients who say our services have positively impacted their business.



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