How does Oregon OSHA adopt a rule?

Learn how to prevent automotive repair shop hazards and avoid a citation

VPP insight: Best practices during the COVID-19 pandemic
Resource

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New problems bring new partners in search for balance

By Michael Wood

I have written before about the challenges that the COVID-19 pandemic brings to many of those struggling to deal with it in the workplace – including lifelong workplace health and safety professionals. In the case of Oregon OSHA education, consultation, and enforcement activities, it has also required us to engage not only with our “regular” customers, but also with people who may not have given workplace health and safety rules all that much thought until recently.

With very few exceptions, we have jurisdiction over all employers, workplaces, and workers in the state. But, as a practical matter, folks in relatively low-risk environments rarely see us. However, in the past eight months, that has changed – as we have processed the nearly more than 1,500 COVID-19 complaints we have received, we have reached out to businesses that may never have even given us a thought before. In some cases, we have literally been told things like “you guys only have jurisdiction over construction and stuff like that.”

As the COVID-19 enforcement activity has increased our visibility, our non-COVID complaint workload has increased as well. Even after deducting the COVID-19 complaints, we have received more than twice the complaints we would normally have received. And that’s probably a good thing – more employers, even relatively low-risk employers, are thinking about the safety and health of their workers.

The same process has played out in relation to our temporary COVID-19 rulemaking activities. We are engaging with the usual groups of stakeholders – but we also are receiving a good deal of interest and feedback from office workers, retail store owners, and service industries with whom we are not usually all that engaged. And the broad scope of practices needed to keep both workers and the general public safe during this pandemic means that the “front line” for this safety and health challenge is no longer primarily in places such as construction and logging. Agriculture, manufacturing, and processing activities remain a significant area of potential risk, but so do home care workers, office workers, and retail store employees, to name just a few.

And that means that we not only have to engage with different industries, but we also have to think about the way the rules we consider will impact workplaces to which we normally do not pay a lot of attention.

As always, we strive to strike a balance in our rulemaking. We must provide greater protection to workers in the face of this pandemic. But – especially in a temporary rule developed quickly and allowing for relatively little phase in – we must also be aware of the potential impacts on industries that are already facing strains because of the pandemic and its effects.

We will do our best to balance those interests, which are certainly sometimes (though not necessarily) in tension with one another. Will we get it exactly right? Probably not. But I am confident that we will do it well, and I am certain that the rule we adopt will increase protection for workers, while at the same time avoid insurmountable obstacles for the employers for whom those workers work.

These are extraordinary times. And they call for extraordinary measures. Fortunately, we are reminded day after day that we are truly surrounded by extraordinary people – who are up to the challenges put in front of them.

Be safe. Be healthy.
Don’t miss

Education:
Workshop classes will be held virtually until further notice.
A minimum of five registrants is needed to hold a virtual workshop.
Registered participants will receive an email if a cancellation is necessary.

Register and attend
Using the secure online registration portal, you can find classes. The workshop schedule changes every three months.
For more information, visit the classroom workshops page.
Find more information about education resources by visiting Oregon OSHA’s education and training page.

To receive conference registration materials, exhibitor information, or sponsorship information, contact the Conference Section:
oregon.conferences@oregon.gov | 503-947-7411 | osha.oregon.gov/conferences

Due to the effects of COVID-19, Oregon OSHA and its conference partners have made changes to the 2020-2021 event schedule. Mark your calendar for these workplace safety and health conferences:

Northwest Safety & Health Summit by Region X VPPPA
May 18-20, 2021 • Kennewick, Washington

Blue Mountain Occupational Safety & Health Conference
June 7 & 8, 2021 • Pendleton

Central Oregon Occupational Safety & Health Conference
Sept. 27 & 28, 2021 • Bend

Southern Oregon Occupational Safety & Health Conference
Oct. 19-21, 2021 • Ashland

Western Pulp, Paper, and Forest Products Safety & Health Conference
Nov. 30-Dec. 3, 2021 • Portland

Mid-Oregon Construction Safety Summit
Jan. 24 & 25, 2022 • Bend

Oregon GOSH Conference
March 6-9, 2023 • Portland
Did you know?

Employers and workers who engage in construction activities in Oregon now have a free and flexible way to improve their understanding of fall protection, thanks to an online video training course produced by Oregon OSHA.

The course, “Fall Protection for Construction,” is designed to help employers and workers meet the requirements of Oregon OSHA’s fall protection standards. It is the fourth course in the division’s “Fall Protection Suite,” which tackles fall hazards across specific industries and different on-the-job situations.

The multimedia “Fall Protection for Construction” course features insights from industry leaders and practical demonstrations. It highlights the relevant requirements, and explains terms and processes. It covers a comprehensive set of fall protection topics in construction.

Datapoints

Oregon’s top five work-related injury events

Based on accepted disabling workers’ compensation claims

<table>
<thead>
<tr>
<th>Injury event</th>
<th>Claims</th>
<th>Percent of total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overexertion and bodily motion</td>
<td>8,365</td>
<td>39.8</td>
</tr>
<tr>
<td>Falls, slips, and trips</td>
<td>5,006</td>
<td>23.8</td>
</tr>
<tr>
<td>Contact with objects and equipment</td>
<td>4,334</td>
<td>20.6</td>
</tr>
<tr>
<td>Transportation incidents</td>
<td>971</td>
<td>4.6</td>
</tr>
<tr>
<td>Violence and other injuries by people and animals</td>
<td>936</td>
<td>4.5</td>
</tr>
</tbody>
</table>

Accepted disabling claims are from calendar year 2018, the most current year available for published data.

Quotable

“This new course reflects Oregon OSHA’s ongoing commitment to expand our educational offerings in a way that fits the busy schedules of employers and workers, and that helps them maintain safe workplaces.”

– Roy Kroker, consultation and public education manager for Oregon OSHA, on the division’s “Fall Protection for Construction” online educational video.
How does Oregon OSHA adopt a rule?

By Ellis Brasch

Oregon OSHA has adopted nearly 1,000 current rules – 992 by my count – including general administrative rules, general industry rules, construction rules, agriculture rules, and logging rules.

Many employers are familiar with some of these rules; other rules are less widely-known. But all of the rules were adopted through a set of procedures that are intended to ensure the rules are reasonable and that they protect the life, safety, and health of employees. How does an Oregon OSHA rule emerge from these procedures? All Oregon OSHA rules are born in one of four ways:

1. An interested party petitions Oregon OSHA to create a new rule or amend an existing rule.
2. Federal OSHA creates a new rule or amends an existing rule: Oregon OSHA has six months to adopt the new rule or create an Oregon rule that is as effective as the federal rule.
3. The Oregon legislature enacts a bill and Oregon OSHA proposes a rule in response to that bill.
4. Oregon OSHA proposes to create or amend a rule.

The making of a rule: Advisory committees, notifications, and public hearings

Oregon OSHA is required by the Administrative Procedures Act – rules that govern state agency rulemaking – to consult an advisory committee in developing a rule. Oregon OSHA must also describe its proposal in a Notice of Proposed Rulemaking, an official document published in the Oregon Bulletin. The Oregon Bulletin is published on the first day of each month by the Oregon Secretary of State. Oregon OSHA also notifies Oregon legislators and interested members of the public who have signed up to receive email notifications when a rule is proposed.
If Oregon OSHA grants a petition, then rulemaking begins and the agency must consult an advisory committee to start the process. If Oregon OSHA denies the petition, the agency must respond to the petitioner in writing, stating why the petition was denied.

Temporary rulemaking and rules for emergencies

Oregon OSHA can also adopt temporary rules when it is necessary to protect workers from imminent hazards. Temporary rules begin just as permanent rules do, but temporary rules do not require a Notice of Proposed Rulemaking or a comment period, and temporary rules last only 180 days. The Administrative Procedures Act also requires Oregon OSHA to show why a temporary rule is necessary. Specifically, the agency must describe what would happen if the rule was not adopted, who would be harmed if the rule was not adopted, and why immediate action to adopt the rule is necessary.

Although a temporary rule cannot be extended after 180 days, Oregon OSHA can propose a permanent rule to take its place – but only if there is a likelihood that the hazard will continue. In that case, Oregon OSHA would have to propose a new permanent rule and rulemaking would begin again.
Safety and health hazards in automotive repair shops: \textit{How to prevent them and avoid the common violations}

By Ellis Brasch

Automotive repair shops provide a variety of mechanical and electrical repair services for passenger cars, trucks, vans, and trailers.

Common safety hazards include improper use and maintenance of lifts and floor jacks, tire explosions, improper machine guarding, and uncovered service pits. Health hazards include carbon monoxide, gasoline, noise, paints, solvents, coatings, cleaning acids, and brake cleaners. Among the most hazardous chemicals are methylene chloride, which can be found in some automotive cleaning products, and isocyanates, which are often used in spray-on polyurethane products for truck beds and trailers.

Now, consider the most-violated safety and health rules in automotive repair shops:

- Hazard communication [1910.1200]
- Safety committees and safety meetings [437-001-0765]
- Respiratory protection [1910.134]
- Abrasive wheel machinery [1910.215]
- Material handling [437-002-0221]
- Sanitation [1910.141]
- Medical services and first aid [437-002-0161]
- Portable fire extinguishers [437-002-0187]
- Spray finishing [437-002-1007]
- Personal protective equipment [437-002-0134]

It shouldn’t come as a surprise, but many of the common hazards in automotive repair shops are associated with the most-violated rules. How can employers can keep their workplaces safer and avoid citations? Be familiar with the rules and their key requirements.

**Hazard communication [1910.1200]**

- A written hazard communication program is required that includes an inventory of all chemicals present at the workplace.
- Safety data sheets are required for hazardous chemicals, and containers of hazardous chemicals must be properly labeled.
- Employees must be trained about the hazardous chemicals in their work area when they are hired and whenever a new hazardous chemical is introduced.

**Safety committees and safety meetings [437-001-0765]**

- If you are an employer in Oregon, your business must have a safety committee or have safety meetings, unless you are the sole owner and the only employee of a corporation.

**Respiratory protection [1910.134]**

- When respirators are necessary to protect employees, a written respiratory protection program is required.
- A medical evaluation is required to determine an employee’s ability to use a respirator.
- Respirators must be properly cleaned, disinfected, stored, and inspected.
- Employees must be trained annually on the proper use of respirators.
- A fit test is required to ensure that the respirators fits properly.
Abrasive wheel machinery [1910.215]

Abrasive wheel machinery must be properly guarded. Ensure that tongue guards are set at the appropriate distance from the grinding wheel and that work rests are accurately adjusted.

Material handling [437-002-0221]

Storage of material

Stored material must not obstruct lights, fire extinguishing equipment, aisles, exits, or electrical switch panels.

Automotive hoists

- When automotive hoists are raised with a load to a position that presents a hazard to employees, the hoists must be supported by a safety device.
- Vehicles must be placed on lifts and operated in accordance with the requirements ANSI B153.1 and the lift manufacturer.

Sanitation [1910.141]

Employees must not store or consume food or beverages in a toilet room nor in any area where they are exposed to toxic materials.

Medical services and first aid [437-002-0161]

- An eyewash is required where employees handle substances that could get into their eyes.
- Readily available first-aid supplies are required that are appropriate for the types of injuries that could occur.

Portable fire extinguishers [437-002-0187]

- Visually inspect each fire extinguisher every month.
- Be sure each fire extinguisher has a full charge and no defects.

- Remove and replace any fire extinguisher that does not work.
- Keep a record of the annual maintenance of each fire extinguisher.

Spray finishing [437-002-1007]

- Do spray finishing in a spray booth that has local exhaust ventilation.
- Keep employees not engaged in spray finishing at least 20 feet away from the spraying and overspray area.
- Ensure that employees who do spray finishing use appropriate respiratory protection, unless there is adequate ventilation. See 437-002-0382, Oregon Rules for Air Contaminants, for ventilation requirements.

Personal protective equipment [437-002-0134]

You must determine if your workplace has hazards that you cannot eliminate or control without personal protective equipment (PPE). If there are such hazards, you must:

- Select the PPE that protects your employees from the hazards.
- Communicate your selection decisions to each employee.
- Ensure that the PPE fits each employee.
- Require your employees to use their PPE when they are exposed to the hazards.

You must also certify in writing that you have done the hazard assessment.
VPP insight: Best practices during the COVID-19 pandemic

By Aaron Corvin

Seeking to collect best practices for workplace health and safety during the COVID-19 outbreak, Oregon OSHA surveyed multiple employers that are members of the division’s Voluntary Protection Program (VPP).

These employers are from a variety of industries. They have demonstrated their commitment to go well beyond minimum safety requirements by embracing VPP. The program requires a company’s safety and health management system to excel in all areas, including management leadership, employee involvement, worksite analysis, hazard prevention and control, and safety and health training.

Oregon OSHA offers the following compilation of best practices to help light the way as employers across the state address worksite concerns in the face of the coronavirus outbreak:

Before work begins

- Implemented maximum occupancy signs on such facilities as breakrooms, conference rooms, and restrooms.
- Used tape to designate six-foot locations in work areas and in breakrooms.
- Staggered start times by department.
- Internally cleaning touch points and common areas.
- Implemented telework rotations for office personnel.
- Early adoption of travel bans and work-from-home recommendations.
- Early adoption of restriction on in-person meetings and use of virtual technologies.
- Sick employees stay home, do not come to work. They call the human resources hub, which asks a series of questions to enable tracking and tracing. Doctor’s release needed to return to work.

Start of work shift

- Implemented daily health screenings, which includes temperature checks before entering the facility.
  - Employee/contractor/visitor: COVID-19 screening form includes temperature check in front office lobby. Screening station set up in front lobby; temperature must be at or below 99.5 degrees F to enter plant; must not exhibit any other COVID-19 symptoms.
- Questionnaire screening for all personnel on site; three questions:
  - Am I currently experiencing cold or flu-like symptoms, including a fever of more than 98.6 degrees F orally, cough, shortness of breath, or have I lost my sense of taste or smell?
In the past 14 days, have I been near (within six feet for an extended period of time) someone who was confirmed positive for COVID-19 by a public health authority?

In the past 14 days, have I, or someone I live with, traveled to a Centers for Disease Control and Prevention or state-designated area of high risk?

- Temporary suspension of pre-shift warm-up to observe physical distancing.
- Time provided to wipe down shared equipment.
- Elimination of clock-in/out; supervisors verify attendance at each work station.
- Use of separate facility entrances and exits to avoid shift-to-shift interaction.

**During the shift**

- Staggered work shifts to eliminate shared workstations and reduce the number of employees being on site at one time.
- Use a physically-distanced holding area between machine centers to keep team members apart.
- Offered design of corrugated partitions to customers with production lines that can’t offer physical distancing.
- Limited occupancy for all areas of the facility, including offices, common areas, and lunch rooms. Occupancy limits posted at entrances. Only personnel with a business need enter facility (no visitors).
- Staggered break schedule to minimize close contact interactions.
- Contact information for company health services communicated frequently. Addressed mental health issues, including availability of employee assistance program.

- Safety guidance for COVID-19 posted throughout facility:
  - Physical distancing
  - How to handle physical distancing in vehicles
  - How to handle physical distancing when performing work
  - How to handle the use of masks when physical distancing cannot be maintained
- Set up no-contact thermometers, then trained and encouraged employees to use them.
- Implemented identification and cleaning schedules of shared items in work areas; cleaning tags put in place with date/initials of cleaners.
- Safety committee virtually reviewing incidents and near misses; safety committee inspections: requests for volunteers to evaluate their own work areas, complete inspection forms, and submit for further examination, follow up, and recordkeeping.

**End of shift**

- Twice-daily personal temperature checks at home, before and after work.
- Implemented procedure so personnel exit a different door than the oncoming shift will use.

**Cleaning schedules**

- Put into place additional cleaning crew to clean break rooms and restrooms more frequently.
- Third-party cleaner identified for confirmed case scenario.
- Increased cleaning by third-party cleaning company and by employees, especially in high-touch areas.
Implemented procedure where shared keyboards are disinfected, then covered with plastic wrap between users.

Established procurement group for early identification and ordering of additional supplies – including for cleaning and personal protective equipment – to avoid running out.

Weekly logs are kept for the cleaning of each of the areas in the building and maintained in a log book.

The warehouse is completely mopped once a day with a heavy duty floor cleaner, and production work areas disinfected twice daily. All empty product carts are separated and disinfected once a day.

For contractors

- Distribution of COVID-19 kits for truck drivers, including hand sanitizer, gloves, and masks.
- Implemented health screenings for visitors and drivers.
- Created questionnaire for all contractors to enable screening and tracking.

- Required contractors to turn in a written policy about what they will do to prevent exposing employer’s workers.
- Portable toilets installed for truck drivers, eliminating need for drivers to come inside plant. Paperwork left outside in designated drop-off boxes.

Other

- Continuous update of coronavirus policy.
- Established quarantine rooms and procedures in case symptoms develop on site.
- Organized central repository for all coronavirus-related management documents, providing easy access by team.
- Trainings/meetings must enable participants to maintain at least 6 feet between each other.
- Multiple virtual formats used for meetings with five or more people.
- Put in place policy to minimize hard copies, where feasible.
What you should know about work-related musculoskeletal disorders

By Ellis Brasch

When workers’ jobs involve awkward postures or excessive manual forces to complete a task, fatigue and discomfort often result. As those tasks are repeated over and over, muscles, tendons, ligaments, nerves, and blood vessels can be damaged. The resulting injuries are called work-related musculoskeletal disorders. Work-related musculoskeletal disorders include overexertion injuries, cumulative trauma, and repetitive motion injuries.

Unless we give our bodies enough time to recover or we change the work so that it’s less stressful, we’re setting ourselves up for a work-related musculoskeletal disorder.

Work-related musculoskeletal disorders were responsible for about 38 percent of all accepted workers’ compensation claims in Oregon in 2017 (the most current year for available data). Interestingly, that’s a decrease of about 6 percent from previous years. But work-related musculoskeletal disorders are still the largest single cause of workers’ compensation claims in the state.

Those claims are not cheap. In 2019, the average cost of a single workers’ compensation claim for a musculoskeletal disorder was $22,290. Not included in that number are indirect costs from increased employee turnover, absenteeism, and retraining; those costs are typically four to 10 times higher than direct costs.

Work-related musculoskeletal disorders are easier – and less expensive – to treat in their early stages, but, left untreated, they can quickly become disabling.

Work-related musculoskeletal disorders can also drastically affect employers’ cost of doing business, as well as employees’ personal lives. Work practices that
control work-related musculoskeletal disorders can reduce those economic costs and make employees more efficient, more comfortable, and improve morale.

**Symptoms of work-related musculoskeletal disorders**

Symptoms of work-related musculoskeletal disorders include:

- Pain from movement, pressure, or exposure to cold or vibration
- Change in skin color from exposure to cold or vibration
- Numbness or tingling in an arm, leg, or finger, especially in the fingertips at night
- Decreased range of motion in the joints
- Decreased grip strength
- Swelling of a joint or part of the arm, hand, finger, or leg
- Muscle fatigue

**How work-related musculoskeletal disorders happen**

Tasks are the things employees do to accomplish their jobs. Work-related musculoskeletal disorders can occur when those tasks put too much stress on their bodies and they cannot adequately recover.

Some jobs have only one task, but most jobs have many tasks. How do you as an employer – or an employee – know which tasks are causing a musculoskeletal disorder? One way is to identify the factors that create risks for musculoskeletal disorders. Ergonomic risk factors are the parts of tasks that stress the body and increase the possibility of injury. They include:

- Awkward postures
- Excessive force
- Repetitive motion
- Pressure points
- Vibration
- Hot and cold temperatures
- Eyestrain

When you identify the ergonomic risk factors your employees are experiencing, you will have a better understanding of how musculoskeletal disorders happen and you can take steps to control them.

**Awkward postures**

Posture affects which muscle groups are active during physical activity. Awkward postures make tasks more demanding by increasing the exertion required from smaller muscle groups and preventing the stronger, larger muscle groups from working at maximum efficiency. The increased exertion from the weaker, smaller muscle groups impairs blood flow and increases the rate of fatigue. Awkward postures include:

- Repeated or prolonged reaching
- Twisting
- Stooping
- Working overhead
- Kneeling
- Squatting
- Holding fixed positions

Employees may resort to awkward postures when work practices or equipment give them no other option for accomplishing a task. Awkward postures typically affect hands, wrists, arms, shoulders, neck, lower back, and knees.
Excessive force

Force is the amount of muscular effort used to perform work. Excessive force is muscular effort to the point that makes it difficult for the body to recover. Using large amounts of force can cause fatigue and increase the risk of an injury. Factors that affect the use of force include:

- The shape, weight, dimensions, and bulkiness of a load
- The effort required to move a load
- How long a load is held, carried, or handled without giving muscles time to relax
- The number of times a load is handled per hour or over a work shift
- The resistance associated with moving a load
- The vibration associated with a task
- The body posture necessary to perform a task
- The time needed to do a task
- The temperature of the task environment
- The force necessary to perform a task
- The type of grip, the position of the grip, and the amount of friction it provides

Repetitive motion

During repetitive tasks, the same muscles, tendons, or joints perform the same motions over and over without adequate time for recovery. The cycle is affected by the pace of work, recovery time, and the amount of variety in a task. Awkward postures and excessive force increase the risk of injury. However, injuries may also happen when highly repetitive tasks are combined with low-force exertions, such as light assembly tasks involving the hands, wrists, elbows, and shoulders.

Pressure points

Contact stress can result from pressing against hard surfaces or edges of surfaces. Certain areas of the body are more susceptible to pressure injury because nerves, tendons, and blood vessels are close to the skin and underlying bones. These areas include the sides of the fingers, palms, wrists and forearms, elbows, and the knees.

Vibration

Vibration – especially when it is continuous or intense – can cause pain, numbness and tingling sensations, increased sensitivity to cold, and decreased sensitivity to touch in the fingers, hands, and arms. Poorly designed and improperly maintained tools are common sources of injury.

Vibration can also affect the whole body – for example, when employees sit or stand in vibrating vehicles or on vibrating work surfaces; whole-body vibration is associated with lower back pain.

Hot and cold temperatures

Heat and humidity make the body more susceptible to fatigue and increase the risk for heat exhaustion and heat stroke. Cold temperatures decrease blood flow, muscle strength, and manual dexterity, particularly when gloves are worn. Cold and moisture increase the risk for hypothermia.

Eyestrain

When lighting is not suitable for a task, the work is positioned too far away, or materials are blocking the field of vision, employees may have to bend, reach, twist, or hold fixed positions. Handling or assembling very small parts or performing extremely precise tasks may also contribute to eyestrain and awkward postures.
How to identify the causes of work-related musculoskeletal disorders

The causes of musculoskeletal disorders can be more difficult to identify than other workplace hazards such as unguarded equipment or elevated surfaces where falls are possible. But, you can use the same method to identify them. Evaluate your workplace with a focus on identifying the risk factors for musculoskeletal disorders. Here are three important things you can do to get started:

1. Encourage employees to report aches and pains they experience associated with a specific duty, tool, or task.
2. Review injury records and reports of symptoms of work-related musculoskeletal disorders.
3. Evaluate job tasks.

Encourage employees to report work-related aches and pains

Because your employees operate the equipment, use the tools, and do the tasks that expose them to musculoskeletal disorders, they can give you first-hand information about the risk factors. Their opinions and suggestions are important, particularly when work tasks are complex and involve multiple risk factors. Because of their knowledge and experience, employees should be included in risk assessments and other activities to identify causes of musculoskeletal disorders. Employees should also be encouraged to provide early reports of musculoskeletal disorder symptoms, which can be a valuable part of risk assessments.

Review injury records

Review your OSHA 300 Injury and Illness Logs and workers’ compensation records for cases involving sprains, strains, and other overexertion injuries. Look for descriptions of the risk factors that contributed to the injury. Keeping a log of symptoms of work-related musculoskeletal disorders can be valuable for identifying tasks that may lead to injury and productivity loss.

Evaluate job tasks

Conduct a job task analysis, focusing on the risk factors for musculoskeletal disorders. A job task analysis evaluates each of the tasks that make up the job to identify the risk factors and the parts of the body that are affected. A job task analysis, which can be more effective when a team of employees does the evaluation, consists of eight basic steps.

1. List the tasks necessary to accomplish the job.
2. Ask the employee about any discomfort associated with doing the tasks and document it.
3. Video the employee doing the job.
4. Review the video and any notes with the team to identify musculoskeletal disorder risk factors.
5. Brainstorm ways to reduce or eliminate the source of exposure.
6. Determine what changes are feasible.
7. Implement the changes.
8. Evaluate the effectiveness of the changes.

Consider having an safety professional who has an understanding of musculoskeletal disorders help you do a job task analysis. Oregon OSHA Consultative Services provides ergonomics services that are free to Oregon employers.

How to prevent work-related musculoskeletal disorders

There are three types of controls you can use to prevent work-related musculoskeletal disorders. They are, in order of their effectiveness:

1. Engineering controls – most effective
2. Administrative controls – less effective
3. Personal protective equipment – least effective

Engineering controls – most effective

Engineering controls are physical changes in the workplace that reduce or eliminate employees’ exposures to the causes of musculoskeletal disorders.

Once you have isolated the exposure source – manually lifting heavy objects, for example – an effective engineering control will make it easier for an employee to lift the objects or entirely eliminate the manual lifting task. Reducing or eliminating the exposure source can also improve employees’ efficiency and productivity.

The best time to introduce engineering controls is when new facilities, processes, or work procedures are being planned, but effective changes can be made at nearly any stage in the operation.
Administrative controls – less effective

Administrative controls are work practices and policies intended to reduce the risk of musculoskeletal disorders. However, administrative controls are usually less effective than engineering controls because they have only a limited effect on the source of the exposure. Administrative controls also require continual monitoring to ensure they are effective.

Administrative controls intended to reduce lifting fatigue, for example, might include one or more of the following:

- Establishing lifting guidelines (such as getting as close to the load as possible, keeping arms and elbows close to the body, bending at the knees, and keeping a straight back)
- Alternating the heavy lifting task with less strenuous tasks
- Requiring two employees to lift each object
- Adjusting employees’ work schedules and the work pace
- Providing employees more recovery time between lifts

Personal protective equipment – least effective

Personal protective equipment designed to prevent musculoskeletal disorders includes items such as gloves, knee and elbow pads, and footwear.

- Properly-fitted gloves can protect hands from cold, vibration, pressure points, and excessive force. Make sure that the glove is appropriate for the task; gloves that are not suited for the task can decrease dexterity and increase muscle fatigue.
- Knee and elbow pads can protect the body from pressure points caused by hard or sharp surfaces.
- Properly-fitted footwear can prevent employees from slipping and prevent fatigue from long hours of standing on hard surfaces.

Consider the temperature of the work environment, the amount of hand dexterity required, the risk of abrasion, and whether the object’s surface is wet or oily.

What about back belts? Oregon OSHA discourages the use of back belts for manual lifting. Wearing a back belt does not reduce the risk of a back injury and may actually increase the risk if it gives an employee a false sense of security.

How long does it take for the controls to work?

Allow time for employees to experience a modification before assessing the effectiveness. Employees may need a week or two as a “break-in period” to get accustomed to the changes.

Providing a break-in period can also help you avoid rejecting an otherwise good control. Some controls may require employees to use new muscle groups or different parts of the body and some employees may initially feel fatigued, tired, or sore.

Periodically check back with employees to find out how the controls are working. Then, evaluate each control, considering:

- Has it reduced or eliminated fatigue, discomfort, symptoms, or injuries?
- Has it added any new risk factors?
- What effect has it had on employee productivity and efficiency?
- What effect has it had on product quality?
- Have employees accepted it?
- Has it reduced absenteeism and turnover on affected jobs?
- Have employees received enough training to ensure the control is effective?

Oregon OSHA ergonomics consultants Steve Morrissey and Nathan Sweet also contributed to this article.
Protecting construction workers from falling objects — key requirements

By Ellis Brasch

Falling objects are serious hazards at high-rise construction sites, which is why materials and tools must be secured or moved far enough back from an open edge when they are not being used. But most of these items do not have to fall hundreds of feet to injure unsuspecting workers and the public. What are Oregon OSHA’s requirements for protecting construction workers from falling objects? Here is a summary of the key rules — and an important ANSI/ISEA voluntary consensus standard.

Employees exposed to falling objects must wear hardhats and their employer must do at least one of the following to protect them:

- Erect toeboards, screens, or guardrail systems to prevent objects from falling from higher levels. [437-003-2501]
- Erect a canopy structure and keep objects far enough from the edge of the higher level so that they do not fall over the edge. [437-003-2501]
- Barricade the area around which objects could fall and prohibit employees from entering the area. [437-003-2501]
- Keep objects far enough from the edge of the higher level to prevent them from falling. [437-003-2501]

Toeboards

- Toeboards used for falling-object protection must be erected along the edge of the overhead walking-working surface to protect employees below. [1926.502(j)]
- Toeboards must be capable of withstanding, without failure, a force of at least 50 pounds applied in any downward or outward direction at any point along the toeboard. [1926.502(j)]
- Toeboards must be at least 3 1/2 inches high from their top edge to the walking-working surface; there must not be more than 1/4-inch clearance between the walking-working surface and the bottom edge of the toeboard. [1926.502(j)]
- Toeboards must be solid or have openings not more than 1 inch in their greatest dimension. [1926.502(j)]
Guardrails

- Where tools, equipment, or materials are piled higher than the top edge of a toeboard, panels or screens must be erected from the walking-working surface or toeboard to the top of a guardrail system’s top rail or midrail for a distance sufficient to protect employees below. [1926.502(j)]
- Guardrails must have all openings small enough to prevent objects from falling through the guardrail. [1926.502(j)]

Holes

Holes in walking-working surfaces (including skylights) must be covered to prevent objects from falling on employees below. Covers must meet the requirements in Covers, 1926.502(i). [437-003-2501]

Specific requirements for overhand bricklaying and related work

- No materials or equipment, except masonry and mortar, must be stored within 4 feet of the working edge. [1926.502(j)]
- Excess mortar, broken or scattered masonry units, and all other materials and debris must be removed from the work area at regular intervals. [1926.502(j)]

Specific requirements for roofing work

- Materials and equipment must not be stored within 6 feet of a roof edge unless guardrails are erected at the edge. [1926.502(j)]
- Materials that are piled, grouped, or stacked near a roof edge must be stable and self-supporting. [1926.502(j)]
- Canopies, when used as falling object protection, must be strong enough to prevent collapse or penetration by any objects that may fall onto them. [1926.502(j)]

Specific requirements for working on scaffolding

When working from scaffolds, employees must wear hardhats and must be protected from falling objects by one of the following methods:

- Screens
- Guardrail systems
- Debris nets
- Catch platforms
- Canopy structures that contain or deflect falling objects

Keep large or heavy objects far enough back from the scaffold edge and secure them if necessary to prevent them from falling.

Where there is a danger of tools, materials, or equipment falling from a scaffold and striking employees below, employers must do one or more of the following:

- Erect a barricade around the area to which objects can fall and do not permit anyone to enter the hazard area. [1926.451(h)]
- Erect a toeboard along the edge of platforms that are more than 10 feet above a lower level for a distance sufficient to protect employees below; on float (ship) scaffolds, an edging of 3/4-inch by 1 1/2-inch wood or equivalent may be used in lieu of toeboards. [1926.451(h)]
- Where tools, materials, or equipment are piled to a height higher than the top edge of the toeboard, erect panels or screens extending from the toeboard or platform to the top of the guardrail for a distance sufficient to protect employees below. [1926.451(h)]
- Erect a guardrail system with openings small enough to prevent objects from falling through the guardrail. [1926.451(h)]
Erect a canopy structure, debris net, or catch platform strong enough to withstand the impact of potential falling objects. [1926.451(h)]

Canopies

Canopies used for falling object protection must:
- Be installed between the falling object and the employees below. [1926.451(h)]
- Be equipped with additional independent support lines equal in number to the number of points supported, and equivalent in strength to the strength of the suspension ropes when used on suspension scaffolds; independent support lines and suspension ropes must not be attached to the same points of anchorage. [1926.451(h)]

Toeboards

Toeboards used for falling object protection must:
- Be capable of withstanding, without failure, a force of at least 50 pounds applied in any downward or horizontal direction at any point along the toeboard. 1926.451(h)
- Be at least 3 1/2 inches high from the top edge of the toeboard to the walking-working surface. 1926.451(h)
- Be securely fastened at the outermost edge of the platform and have not more than 1/4-inch clearance between the walking-working surface and the bottom edge of the toeboard. 1926.451(h)
- Be solid or have openings not more than 1 inch in their greatest dimension. 1926.451(h)

Specific requirements for steel erection

- All materials, equipment, and tools that are not used at heights must be secured so that they will not drop. [1926.759]
- The controlling contractor must prohibit other construction work below steel erection activities unless overhead protection for the employees below is provided. [1926.759]

American National Standard for Dropped Object Prevention Solutions, ANSI/ISEA 121-2018

ANSI/ISEA 121-2018 is a voluntary consensus standard that sets the minimum design, performance, testing, and labeling requirements for products intended to prevent dropped objects.

Note that ANSI/ISEA 121-2018 is not an Oregon OSHA requirement, nor does it cover traditional falling-object prevention methods such as netting, barricades, and toe boards that do not prevent objects from being dropped. However, these guidelines are important because they provide tool manufacturers with the necessary criteria for developing safe and reliable dropped-object prevention solutions. The standard identifies four types of “active” solutions that prevent objects from being dropped:
- Anchor attachments: Retrofit attachment points installed on a structure or a worker to anchor tool tethers.
- Tool tethers: Lanyards that connect tools to an anchor point.
- Tool attachments: Retrofit attachment points installed on tools and equipment that allows them to be tethered.
- Containers: Bags and buckets that are used to transport tools and equipment at heights.

Learn more about ANSI/ISEA 121-2018 at ISEA’s Dropped Object Prevention Resources webpage.
Lessons learned: How a hardhat can save your life

By Richard Marshall and Dave Borrus

Richard Marshall (director of Safety, ADSC: International Association of Foundation Drilling) and Dave Borrus (business manager, Pile Drivers Local Union 56, New England Regional Council of Carpenters) share this story about how the most basic safety gear can save a life.

During the last week of December, a brother pile driver was working on a slurry wall panel installation. The crew had just finished hoisting a rebar panel to vertical when a 10-inch cut-off piece of #12 rebar fell 90 feet from the top of the panel and stuck the worker directly on the top of his hard hat. You can see the obvious hole in his hard hat. He suffered a bad lesion on his head that required stitches and staples, and caused a concussion. We all can conjure up some images of what “could have been” the story had his hard hat not absorbed most of the impact.

The obvious first lesson learned: Your hard hat is a valuable piece of personal protective equipment. This is a great time to inspect yours and insist that your co-workers do the same. Look for cracks, deformations, holes, brittleness, and excessive wear to the shell. Also, inspect the suspension webbing and mounting attachment points. The general school of thought is that you should, at a minimum, replace the webbing after a year of use and replace the entire hat after five years. Remember that the shell is exposed to the sun, which causes the material to deteriorate over time, thus losing its ability to protect you.

Do not wear a baseball cap, sweatshirt hood, knit cap, or any thing under your hat, unless it was designed to be worn with a hard hat suspension. Not only will your peripheral vision be impaired, your hat will not stay on your head properly and you will lose its valuable protection.

Second lesson learned: Inspect the rebar panel or whatever else you plan to lift prior to lifting it. It is common to trim rebar that is too long or is bent. Make sure all cut-off pieces of material, bolt, scrap, hose fittings, and tools have been removed from the object to be lifted – check it twice – before you lift.
Our business has two four-wheel electric forklifts made by different manufacturers — but their data plates each indicate a maximum lifting capacity of 7,000 pounds. Does that mean they are actually capable of lifting a 7,000-pound load?

No. All forklifts have rated load capacities that are identified on their data plates, along with other important information, such as model number and serial number. Those load capacities are typically rated at a 24-inch load center, which is the center of standard 48-inch-long forks.

The forklift’s rated load capacity is based on an ideal load — a perfectly shaped cube whose center of gravity is exactly in the center of the cube — resting on a standard 48-inch by 48-inch pallet. The horizontal distance from the center of the load to the vertical part of the forks is exactly 24 inches, called load center. But most loads are not ideal loads; a forklift’s rated capacity will drop as you move the load (and its center of gravity) toward the tips of the forks or excessively to the right or left of center. For the same reason, if the load is oversized, irregularly shaped, or loaded incorrectly, the actual load-center distance could exceed the ideal load-center distance, reducing the forklift’s rated load capacity.

As a rule of thumb, for every inch you move a forklift load forward, the rated capacity of the forklift will drop a few hundred pounds.

Front-end attachments, including fork extensions, can also reduce or “down-rate” the capacity of a forklift. If you are using a front-end attachment — or attachments — know the down-rated capacity of the forklift with each attachment. The forklift must be marked to clearly identify the attachment and the capacity of the forklift with the attachment at maximum elevation and load-centered.

A forklift’s rated load capacity is also affected by lift height or maximum fork height. Forklifts with high masts have a greater carrying capacity at lower lift heights than at maximum lift heights; therefore, forklifts with high masts may have a dual-capacity rating at the maximum lift height, allowing the forklift operator to work with heavier loads at low heights.

Finally, remember that the forklift manufacturer must approve, in writing, any modifications or additions that affect the capacity or safe operation of a forklift.
Oregon OSHA’s Challenge Program is not as well-known as its popular Safety and Health Achievement Recognition Program (SHARP), but it offers the same key benefit: the opportunity for employers to work with Oregon OSHA’s Consultation section to improve their safety and health programs.

Participating employers work with an Oregon OSHA consultant during a series of consultations for one year to identify and fix hazards and become more self-reliant in managing workplace safety and health. Their workers’ compensation carrier can also participate in the Challenge Program.

Employers receive a one-year deferral from scheduled Oregon OSHA enforcement inspections while they are participating in the program. Construction contractors who successfully complete the program will also satisfy the Construction Contractors Board’s continuing education requirements for contractors seeking to maintain their CCB license.

What the program requires

The Challenge Program requires a comprehensive consultation of your workplace during which the consultant will identify hazards, review injury and illness records, and evaluate your safety and health program. You must agree to fix all hazards identified during the consultation.

During an initial meeting before the comprehensive consultation, an Oregon OSHA consultant will tell you about the Challenge Program’s objectives and requirements so that you understand the commitment necessary to complete the program.

After the comprehensive consultation, the consultant will discuss with you:

- All hazards identified and how they can be fixed
- The timeline for fixing the hazards
- The schedule for one or more follow-up visits to verify that hazards have been fixed
- The need, if necessary, for other Oregon OSHA consultants to evaluate hazards beyond the expertise of the consultant

The consultant will also provide you with a written report that explains the findings of the comprehensive consultation.

Employers who participate in the Oregon OSHA Challenge Program must also:

- Agree to follow all applicable Oregon OSHA safety and health rules
- Have no open inspections from Oregon OSHA’s enforcement section
- Not be a participating SHARP or Voluntary Protection Program site

If you decide to participate, you will receive a letter that explains the terms of the Challenge Program. The program starts when you sign the letter and return it to Oregon OSHA.

For more information about the Oregon OSHA’s Challenge Program, contact Oregon OSHA consultation services.
Oregon OSHA’s training specialist, Craig Hamelund, offers some useful advice on what to consider to ensure that your forklift operators are properly trained.

Many forklift operators I have bumped into along the way have received their training the “practical” way. They were asked to move the forklift out of the way or grab a quick pallet load of something – and then they became a forklift operator! Is practical experience good enough? No. Forklift operators must also have classroom instruction, hands-on training, and an evaluation to determine their competency.

The evaluation must take place in the workplace so the trainer can observe the operator performing typical tasks in the operator’s environment. Someone other than the employer can do the training and the evaluation; however, training out of the workplace must be supplemented with on-site training that covers site-specific hazards and tasks the operator actually will be performing on the job.

The employer must also certify that each forklift operator has been trained and evaluated. The certification must include the operator’s name, the trainer’s name, and the training and evaluation dates. There has been much confusion surrounding the use of the word “certification” as it pertains to Oregon OSHA’s forklift training requirements for general industry and construction. Certification basically means documentation and authorization – both done by the employer. However, neither Oregon OSHA, nor an outside vendor, can truly certify an employer’s forklift operators. Vendors can help with training, but lack the authority to authorize – only the employer can authorize. For example, trainees can enroll in a vendor’s course and receive a card or certificate indicating they have passed the course, but the employer must subsequently certify that the trainees have been trained and evaluated.

**Short take**

**Don’t forget:** *Forklift operator training requires classroom instruction, hands-on training, and an evaluation*

Forklift operators in general industry and construction must be re-evaluated at least once every three years and be retrained when they are not safely operating their forklifts, after a near miss, when they use another type of forklift, or when there is a change in the workplace that could affect the safe operation of the forklift; agricultural employees must have refresher training at least annually.
Oregon OSHA and Oregon Farm Bureau Health and Safety Committee are providing a virtual training workshop for Oregon Farm Bureau members and nonmembers on Dec. 8, 2020. The workshop provides four CORE recertification credit hours for pesticide handlers and applicators.

Cory Stengel, chair of the Oregon Farm Bureau Health and Safety Committee, notes that people with an Oregon Private Pesticide Applicator license or a Pesticide Apprentice license must take the four CORE recertification credit hours to maintain their license. Those who have an Oregon Commercial Pesticide Applicator, Public Pesticide Applicator, or a Pesticide Consultant license are also welcome to attend and are eligible to receive the four recertification credits. “There are always farmers who need this training,” said Stengel, “so the Oregon Farm Bureau Health and Safety Committee thought that offering a virtual option this year would be a useful service to provide.”

This virtual training is free to current voting or supporting Farm Bureau members. Membership will be verified; the cost is $150 for nonmembers.

- **Register for the training as a member** (No charge, each participant must register individually)
- **Register for the training as a nonmember** ($150 per person; only credit cards are accepted)

To join or renew your Oregon Farm Bureau membership, visit [OregonFB.org/join](http://OregonFB.org/join).
There were 41 compensable work-related fatalities in 2019 – six more than during 2018, and nearly 11 more than the 10-year average of 30.3 compensable fatalities. Compensable fatalities are deaths of workers subject to Oregon workers’ compensation coverage.

Oregon compensable fatality facts – 2019

- The largest percentage of compensable fatalities occurred in the construction industry (19.5 percent).
- The largest percentage of compensable fatalities – by occupation – occurred among construction and extraction workers (26.8 percent).
- Vehicles were the source of 43.9 percent of compensable fatalities; 50 percent of those vehicles were trucks, and all but one of those trucks were semi-trucks.
- Twenty-two percent of the compensable fatalities were workers of Hispanic ethnicity, compared to 3 percent during 2018.
- Four of the 41 workers who died were female, an increase from a single case in 2018.
- There was one compensable fatality resulting from homicide.
- The oldest worker was an 89-year-old logging-skidder operator whose skidder tipped over and rolled on a slope. The youngest worker was a 23-year-old ski-patrol worker who fell into a tree well while skiing. The average age of workers was 49 years.

Oregon compensable fatality rates – 1994-2019

There were 3.9 compensable fatal claims per 100,000 workers in 1994, the highest rate in the past 25 years. The compensable fatal claims rate – which dropped to 1.05 in 2010 – was 2.08 in 2019, higher than any previous year since 2008. Fatality rates are the number of compensable fatal claims per 100,000 workers.
Agricultural producers are encouraged to register for the Food Security and Farmworker Safety Program, which provides financial help to comply with Oregon OSHA’s temporary rules to protect workers against COVID-19. The deadline to register is Oct. 25. For more information: https://oda.direct/FSFS

The program, launched in June, helps agricultural producers mitigate the spread of COVID-19 at the workplace and in employer-provided housing and transportation.

In response to the coronavirus emergency, Oregon OSHA issued temporary rules requiring increased field sanitation measures, and more stringent labor housing and transportation requirements.

The Food Security and Farmworker Safety Program provides financial help to meet these increased requirements during peak harvest.

Meanwhile, agriculture producers are encouraged to tap other resources, too. For example, the Oregon Department of Agriculture, Oregon OSHA’s consultation services, and the Oregon Health Authority are conducting no-cost COVID-19 risk assessments.

The risk assessment documents the health and safety measures you have in place and provides feedback on additional steps which could be taken. The assessment involves no inspection or enforcement elements.

The on-site or virtual assessment provides educational and technical support to help protect employees. Schedule today by emailing or calling: FSD-managers@oda.state.or.us; 503-986-4720.

For more workplace health and safety information and resources regarding COVID-19, visit Oregon OSHA’s COVID-19 page.
What happened?

An employee’s hand was amputated while he was clearing seed around an auger and a co-worker turned on the auger.

How did it happen?

The worker was hired through a staffing agency as a temporary employee and had been employed as a helper for about one month. About mid-morning, a blender-machine operator asked the temporary employee if he would help him finish bagging the remaining seed in the company’s small-seed blender, which was capable of blending 1,000 to 2,000 pounds of seed.

The blender operator usually worked alone; however, on this day, he asked the temporary employee to help him for a few minutes. The two workers filled a few bags with seed, but there wasn’t enough seed left in the blender for the auger to deliver it to bags. So, the blender operator began removing the remaining 12 inches of visible seed from the blender’s feed tube with a plastic scoop. He told the temporary employee that it would be necessary to remove the remaining seed from the blender through a small trap-door opening on the other side.

The blender operator went around to the other side of the blender where the trap door was located. He opened a seed bag, lined it up with the trap door,
and then opened the door. Meanwhile, the temporary employee reached into the feed tube to push the seed around the auger toward the blender operator’s bag.

However, the blender operator did not know that the temporary employee had his hand in the feed tube and he pressed the machine’s start/stop button to turn on the auger and allow the remaining seed to flow into his bag.

When he heard the temporary employee scream, he immediately pressed the start/stop button to turn off the auger, then rushed around the machine and saw the temporary employee on his knees with his right arm in the feed tube.

The blender operator called for help and the first worker to arrive placed a belt around the temporary employee’s arm as a tourniquet, while others reversed the auger so they could free his hand, which was attached to his wrist by only a few tendons.

Emergency responders arrived and took the temporary employee in an ambulance to a local hospital where surgeons tried unsuccessfully to reattach his hand.

**Findings**

- Employees cleared seed around the unguarded opening to the auger in the feed tube one to three times a day. On the other side of the feed tube, employees had to quickly press the auger’s start/stop button to remove the remaining seed through a small trap-door opening; the procedure also exposed employees’ hands to the rotating auger.
- Employees said that company officials told them not to place their hands near the blender’s auger when they were removing seed. However, no one told the temporary employee how to clear remaining seed near the auger.
- The warehouse manager and the general manager said the company did not have a written procedure for removing seed from the small blender.
- The general manager said that temporary employees were not permitted to clean machines or run equipment.

**Violation**

437-002-0221(18)(a): *Screw conveyors shall be guarded to prevent employee contact with turning flights.* Employees were exposed to an unguarded auger in the blender’s feed tube and through an opening on the other side of the feed tube.

437-001-0760(1)(a): *The employer must see that workers are properly instructed and supervised in the safe operation of any machinery, tools, equipment, process, or practice that they are authorized to use or apply.* The temporary employee received no training or supervision for the task of removing seed from the small blender.
Going the Distance

Business:
Hawthorn Farm Athletic Club (HFAC)

President:
Heidi Sivers Boyce Ph.D

Director – General Manager:
Tim Maxwell

Operations/facilities/workforce:

Hawthorn Farm Athletic Club is a 68,000-square-foot full-service wellness and athletic facility located in Hillsboro that is owned and managed by a local family business. In June, HFAC management asked Oregon OSHA’s Consultation Services section for help as part of the facility’s reopening plan under Oregon’s COVID-19 guidance for fitness-related organizations.

Oregon OSHA recently checked in with HFAC’s Heidi Sivers Boyce and Tim Maxwell to find out how the facility has adapted to the challenge of safely running a full-service athletic club during a worldwide pandemic.
Question:

HFAC reopened in June 2020, under Oregon’s Phase 1 guidelines. What changes did you put in place so that members could safely workout at the facility?

Sivers Boyce and Maxwell: During the mandated building closure, we tasked a committee of HFAC team members to extensively research government and industry resources to create a working pandemic plan to reopen the facility to in-person visits. We call it the “Healthy Hawthorn Standard.” Upon completion of this plan, we voluntarily submitted it to Oregon OSHA for review and feedback, which was immensely positive. There are many elements, these include:

1. Phased approach to reopening: We had a phased approach to who was allowed into the building when. This allowed a high-communication, high-practice period with new safety protocols among our employees and members. During the first two weeks, access was limited to members who had maintained a virtual membership while the building was closed. We then expanded to any member who wanted to reactivate their membership. We then allowed new people to purchase memberships and began to allow in children. We still do not allow non member guests, except in some highly limited circumstances.

2. Cut back equipment to manage surface cleaning needs: We limited equipment and amenities beyond what was required by the state and county so we did not test capacity limits and could surface clean quickly and easily. For example, we stopped providing yoga mats and removed lounge seating.

3. Strong capacity limiting tools: HFAC’s reservation system controls the process through which people enter the building and the number of people in each area. There is one reservation required to enter the building, and a second required if the member wants to take a group exercise class, swim in the aquatic center pools, or reserve a court in our gymnasium.

4. Rearranged equipment: We did a major rearrangement to allow for distance between individuals. This includes moving our cardio and fitness equipment out into previous lounge areas, our cycle studio to a court space off the gymnasium, spreading all cardio equipment 6-plus feet apart, moving workstations to limit the number of workers in an office.

5. Strong management of entrance/exit: There is a carefully controlled, high-service process for entering and exiting the club. An employee meets the member at their car in our parking lot to confirm their reservation and ask the COVID symptom questions and do a temperature check. Only people who clear those can enter the building. Each individual additionally checks into our software system using their HFAC membership key tag and checks out using the same system upon leaving. This would allow contact tracing if there was a reported case of COVID.

6. Air handling and cleaning: The building is closed to members for 30-minute blocks during the day to allow the air-handling system to filter through upgraded MERV13 filters and to allow the staff to clean all surfaces.

7. Strong COVID safety behavior enforcement: At re-opening, we had multiple employees on each level with the primary duty of educating members about and enforcing safety behaviors, including social distancing, surface cleaning, and mask wearing. We still maintain two attendants focused primarily on ensuring awareness of and compliance to safety behaviors. A concierge and manager on duty reinforce and support the attendants, and complete twice-daily written reports monitoring staff and employee compliance.
**Question:**
You also established a written sanitation and safety protocol for the facility called the “Healthy Hawthorne Standard.” Could you explain what that is?

*Sivers Boyce and Maxwell:* In addition to what is written above, we provide each member with a spray bottle of Environmental Protection Agency-approved disinfectant and a cleaning cloth upon each visit to “clean-as-they-go” while using the club. For additional detail, see [https://hfac.com/sfd/wp-content/uploads/2020/07/Healthy-Hawthorne-Standard-07.2020.pdf](https://hfac.com/sfd/wp-content/uploads/2020/07/Healthy-Hawthorne-Standard-07.2020.pdf)

**Question:**
On Aug. 13, the Oregon Health Authority expanded the statewide mask, face shield, face covering guidance; the guidance now requires staff and members to wear masks, face coverings, or face shields during workouts. Are members finding face shields a viable option during their workouts?

*Sivers Boyce and Maxwell:* Wearing face coverings during strenuous exercise is a challenge for many individuals. A significant portion of people who struggle with the mask find the face shield a viable option. Face shields work well for many group classes, such as cycling, as well as strength building exercises and resistance training. As a service to our members, we have masks and face shields available in our pro shop.

**Question:**
You decided to remove floor fans from exercise areas to reduce the risk of spreading the coronavirus while members were working out. What did you do to maintain ventilation in the exercise areas without the floor fans?

*Sivers Boyce and Maxwell:* Our newly updated HVAC system provides excellent cooling and ventilation throughout the club. Though some members prefer additional airflow during strenuous exercise, they have adapted well without the use of floor fans.

**Question:**
HFAC offers a variety of outdoor workouts at the facility, as well as virtual streaming workouts throughout the week to make working out safer. How have members reacted to these alternatives?

*Sivers Boyce and Maxwell:* Our outdoor workouts continue to be immensely popular and have brought many members back into the club. The virtual streaming workouts are consistently used, though most people prefer the support, camaraderie, and human connection that comes from in-person community. The virtual option is particularly popular with our members who are in an at-risk population, but are highly motivated to maintain their fitness level.
Keeping your Distance

In light of the public health crises triggered by the coronavirus outbreak, Oregon OSHA is offering this special informational page – “Keeping Your Distance” – to reflect the call to engage in physical distancing.

The page includes links to helpful online information, tools, and related connections. These resources, which encompass Spanish-language information, include:

**Interim guidance for Oregon OSHA related to COVID-19: Includes certifications, monitoring, and training; agriculture labor housing; and safety committees and meetings**
- Learn more

**Scope of Oregon OSHA COVID-19 activity**
- Online Q&A

**Oregon OSHA workplace advisory memo — Employer enforcement of the statewide face-covering requirement**
- Online memo
Expectations of employers

- Oregon Health Authority resources and guidance

Construction contractors – job health and safety resources

- Online information

Oregon OSHA consultation services – free and confidential

- Division consultants are ready to connect virtually to provide services specific to COVID-19

Oregon OSHA technical staff

- Our experts can answer questions and help you understand how to apply our rules to your workplace

More State of Oregon resources

- Includes a compilation of resources from the governor’s office, Oregon OSHA, Oregon Health Authority, and Oregon Department of Agriculture

Federal OSHA resources

- Includes: Ten steps all workplaces can take to reduce risk of exposure to coronavirus