OSHA COMPLIANCE FOR PEST MANAGEMENT PROFESSIONALS

Presented by Sheldon Primus, MPA, COSS
PRESENTER: SHELDON PRIMUS

- CEO/Owner of [OSHA Compliance Help](#)
- CEO/Owner of [Utility Compliance Inc.](#)
- Certified Occupational Safety Specialist (COSS)
- Trainer for COSS program
- Authorized OSHA trainer for 10 & 30 Hour General Industry and Construction
- Safety Consultant
GUIDANCE FOR THIS DOCUMENT

This document highlights the programs and OSHA compliance concerns specifically for the Pest Management Professionals and gives compliance tips from an occupational safety consultant.
Sign up for the OSHA Bi-weekly Newsletter Quicktakes to stay well informed on OSHA’s initiatives and compliance activities
TIP #2 KNOW YOUR SIC AND NAICS CODES

• Standard Industrial Classification Code Pest Control
  • 0851 Forestry Services
  • 2879 Pesticides and Agricultural Chemicals, Not Elsewhere Classified
  • 7342 Disinfecting and Pest Control Services
NORTH AMERICAN INDUSTRIAL CLASSIFICATION SYSTEM (NAICS) CODE

- **115112 Pest Control Services, Agricultural**
- **115310 Pest Control Services, Forestry**
- **325320 Pest (e.g. ant, rat, roach, rodent) control poison manufacturing**
- **561710 Pest Control (except agricultural, forestry) services**
- **926140 Pest Control Programs, agriculture, government**
USE YOUR SIC AND NAICS CODES TO LOOK UP OSHA COMPLIANCE HISTORY
USE YOUR SIC AND NAICS CODES TO LOOK UP OSHA COMPLIANCE HISTORY

https://www.osha.gov/pls/imis/citedstandard.html
### Frequently Cited OSHA Standards

**NAICS Code: 561710 Exterminating and Pest Control Services**

Listed below are the standards which were cited by Federal OSHA for the specified NAICS Code during the period October 1, 2013 to September 30, 2013. Penalties shown reflect current rather than initial amounts. For more information, see definitions.

<table>
<thead>
<tr>
<th>Standard</th>
<th>Citations</th>
<th>Inspections</th>
<th>Penalty</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total</td>
<td>9</td>
<td>6</td>
<td>$24,036</td>
<td>All Standards cited for Exterminating and Pest Control Services</td>
</tr>
<tr>
<td>19100037</td>
<td>2</td>
<td>1</td>
<td>$1,300</td>
<td>Maintenance, safeguards, and operational features for exit routes.</td>
</tr>
<tr>
<td>19040039</td>
<td>1</td>
<td>1</td>
<td>$0</td>
<td>--- No Description Found ---</td>
</tr>
<tr>
<td>19100023</td>
<td>1</td>
<td>1</td>
<td>$2,800</td>
<td>Guarding floor and wall openings and holes.</td>
</tr>
<tr>
<td>19100151</td>
<td>1</td>
<td>1</td>
<td>$7,000</td>
<td>Medical services and first aid.</td>
</tr>
<tr>
<td>19100178</td>
<td>1</td>
<td>1</td>
<td>$3,234</td>
<td>Powered industrial trucks.</td>
</tr>
<tr>
<td>19100178</td>
<td>1</td>
<td>1</td>
<td>$0</td>
<td>Wiring methods, components, and equipment for general use.</td>
</tr>
<tr>
<td>19170043</td>
<td>1</td>
<td>1</td>
<td>$3,234</td>
<td>Powered industrial trucks.</td>
</tr>
<tr>
<td>5A0001</td>
<td>1</td>
<td>1</td>
<td>$6,468</td>
<td>OSH Act General Duty Paragraph</td>
</tr>
</tbody>
</table>
TIP #3 KNOW YOUR REQUIRED WRITTEN PROGRAMS

• Fall Protection
• General Safety and Health
• Hazard Communication
• Lockout/Tagout
• Powered Industrial Truck
• Respiratory Protection
• Emergency Action Plan
  • Must be written with 11 or more employees
• Fire Prevention Plan
  • Must be written with 11 or more employees
TIP #4 USE JOB HAZARD ANALYSIS

- The job hazard analysis (JHA) is a practical tool used to help the worker to identify a hazard at each step of a task.

- Steps to a JHA are:
  1. Identify a task
  2. Break it into sequential order
  3. Identify hazards for each step
  4. Set a control for each hazard identified at the individual step

https://www.osha.gov/Publications/osha3071.pdf
CONFINED SPACE

• Confined Space is a:
  • area that can have a person in it, but not designed for people
  • not meant for continuous human occupancy
  • has limited or restricted access and egress

• Attics are considered confined spaces, however in a residential setting the PMP does not have to comply with confined space regulations.

• In a commercial application, the employer must protect the worker from hazards associated with confined spaces.

• When a hazard exists in a confined space the area must be designated as a permit required confined space.

• Permit required confined spaces can be any space with:
  • Configuration hazard
  • Engulfment hazard
  • Environmental hazard (such as extreme temperatures)
  • Etc.
Steps for compliance:
1. Don’t permit workers to enter a confined space without training and a permit.
2. Have a procedure for entering a permit-required confined space.
3. Identify hazards prior to entry and establish rescue procedures.
4. During the entry test and monitor air and hazards.
5. Seek to eliminate hazards and reclassify area to a general confined space.
6. Maintain contact with entrant at all time with a watcher and two-way communication.
LOCKOUT/TAG OUT PROGRAM

• The lockout/tagout program is used to control release of hazardous energy when performing maintenance on equipment.

• Hazardous energy can be:
  • Electrical
  • Mechanical
  • Hydraulic
  • Pneumatic
  • Chemical
  • Thermal
  • Other energy sources

HAZARD COMMUNICATION

HAZARD COMMUNICATION PROGRAM

Steps for an effective hazard communication program:

1. Learn the [29 C FR 1910.1200 Standard](#)
2. Prepare and Implement a written program
3. Label all containers in accordance to OSHA or the Department of Agriculture procedures. (Note: pesticides and fungicides fall under the Environmental Protection Agency (EPA) rules and not OSHA 29 C FR 1910.1200(b)(5)(i)).
4. Maintain current SDSs
5. Inform and Train Employees of program and chemicals
6. Evaluate and Reassess the program
HAZARDOUS MATERIAL

• Hazard material handling and cleanup is an important job for the PMPs.
• Workers exposed to hazardous materials must have initial training, field training, and an annual refresher training in accordance to 29 CFR 1910.120 to learn how to clean up spills.
Employers must have a WRITTEN CERTIFICATION of a PPE hazard assessment to ensure that they are adequately protecting the workers from hazards that can not be controlled through engineering methods (29 CFR 1910.132 Subpart I - Personal Protective Equipment).

A model PPE Hazard Assessment can be found on the Oregon OSHA website.
Workers that have to wear a respirator for protection must have a medical evaluation and a fit test prior to having to wear a respirator.

The medical evaluation asks a series of questions to help the licensed professional healthcare provider to determine if the worker is fit to use a respirator.
PROPOSED RULE FOR FALL PROTECTION

- Exposure to employee of heights of 4 feet or higher must be covered under a fall protection plan.
- Currently, fumigators without fall protection are in noncompliance with the General Duty Clause 5(a)(1)
FALL HAZARD ISSUES:

• Most Common OSHA solutions to height hazards:
  • Scaffolding
  • Fall protection systems with harnesses.
  • Safety Nets
  • Fall Arrest Systems

• Industry Response: Cost are Prohibitive

• OSHA Response:
  • expense is NEVER an acceptable reason not to implement systems to protect worker health & safety.
HORIZONTAL LIFELINE ANCHORED TO ENDS OF RIDGELINE
SLOPED ROOF FALL ARREST SYSTEM

- Anchored at ridgeline and near roof edge
FALL PROTECTION CONTINUED
• Issues of maximum weight on ladder
• Both hands must be used for climbing or working from ladder
• Can’t carry anything which might interfere with climbing ladder
HAND CRANK & MORE POWER LIFTS
In summary:

- OSHA compliance is not only the law, but it’s the right thing to do in order to protect the workers from injury.
- The direct and indirect costs for just 1 injury can amount to thousands of dollars to the company.
- An effective Safety and Health program will reduce costs, lower workers compensation rates, and increase worker productivity.
CONTACT INFORMATION

• OSHA Compliance Help
  • 1-888-398-0120 ext. 102
  • Sheldon@OSHAComplianceHelp.com
  • www.oshacompliancehelp.com
  • Twitter @OSHACOMPHELP
  • Facebook
    www.facebook.com/oshacompliancehelp