

The IRMA Safety Line

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Occupational Safety & Health | Environmental Consulting | Food Safety | Litigation Support

OSHA Site—Specific Targeting (SST)

In May of 2009, OSHA sent out Site –Specific Targeting (SST) letters to more than 13,500 employers nationwide informing them that their injury and illness rates are considerably higher than the national average. These letters began with an OSHA Data Initiative survey sent out to businesses in 2008. The notification was a proactive step encouraging employers to take positive action to improve safety and health conditions in their workplaces. OSHA encouraged these employers to utilize the services provided by OSHA, or employ outside safety and health consultants to help improve their incident rate.

The list includes 3,100 manufacturing establishments with a DART rate of 8 or more, or a DAFWII rate of 6 or more who were put on the list for probable inspection. The 500 non-manufacturing establishments have a DART rate of 15 or more or a DAFWII rate of 13 or more. The remaining 300 establishments are nursing homes and personal care facilities with DART or DAFWII rates of 17 or more or 14 or more, respectively.

Nevertheless, those that ignore OSHA's "encouragement" did so at their own peril; and, those businesses that elected to ignore the OSHA Data Initiative survey will now be added to the list according to OSHA officials.

The bottom line is that if you get a survey, questionnaire, or other communication from OSHA and you are not sure what to do, call us! —cph

Safety Picture of the Month.



Okay! Now let's see you get it down.

What prompts an OSHA inspection?

Obviously, not all 6.5 million workplaces covered by the *OSH Act* can be inspected each year.

The most hazardous workplaces need primary attention. OSHA, therefore, has established a system of inspection priorities. The agency inspects under the following conditions:

1. **Imminent danger**, or any condition where there is reasonable certainty a danger exists that can be expected to cause death or serious physical harm immediately or before the danger can be eliminated through normal enforcement procedures. OSHA gives top priority to imminent danger situations.
2. **Catastrophes and fatal accidents** resulting in the death of any employee or the hospitalization of three or more employees,

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About Us

In our changing environment, your business is confronted with increasingly complicated risks and threats to its future.

Integrated Risk Management Associates, LLC (IRMA) provides the technical assistance to reduce your firm's exposure to loss. Our sources identify the threats to your business and its resources, and we assist you in planning to protect your assets.

Our team of experts will work with you to develop and implement programs to reduce risk, while increasing your productivity. IRMA will design custom policies, procedures, training, inspections and audits to ensure your employees' safety and your peace of mind.

Our trained, experienced, and dedicated staff possess the resources and are always available to protect you, your employees, and your assets.



Risk Happens...

Will You Be Ready?

We offer a wide range of risk management services, including:

- Occupational Safety & Health
- Environmental Consulting
- Food Safety
- Litigation Support

U.S. Labor Department's OSHA proposes more than \$1.1 million in penalties to Milk Specialties Co. in Whitehall, Wis.

WHITEHALL, Wis.

The U.S. Department of Labor's Occupational Safety and Health Administration (OSHA) has cited Milk Specialties Co. in Whitehall with violations of federal workplace safety and health standards and proposed \$1,145,200 in penalties.

OSHA began a December 2008 inspection in response to a complaint alleging a variety of safety hazards at the company's whey processing plant. Willful citations have been issued for the employer's failure to comply with OSHA's confined space entry and control of hazardous energy requirements. Untrained employees entered confined spaces and performed maintenance and cleaning on powered equipment without protection from various hazards. Proposed penalties for the 17 willful violations total \$1,071,000. OSHA defines a willful violation as one committed with plain indifference to or intentional disregard for employee safety and health.

"I am committed to ensuring workers return home to their families safe and healthy at the end of every shift," said Secretary of Labor Hilda L. Solis. "Employers must fully address hazards, properly train their employees and plan their work in a safe manner."

Seventeen serious citations, with proposed penalties totaling \$52,400, include combustible dust and electrical hazards; lack of exit route lighting and signage; lack of confined space evaluations; uninspected fire extinguishers; and untrained and uncertified powered industrial truck operators, among other issues. A serious citation is issued when death or serious physical harm is likely to result if an accident were to occur from a hazard about which the employer knew or should have known.

Four repeat violations with penalties totaling \$21,800 address the guarding of floor and wall openings, ladders and respiratory protection, and other issues addressed in previous inspections of this company. OSHA issues a repeat citation when it finds an employer's violation is substantially similar to a previously cited condition that was affirmed as a violation through a final order of the Occupational Safety and Health Review Commission.

Milk Specialties has been inspected by OSHA 15 times since 1974, including four inspections in Wisconsin between 2006 and 2008, with citations resulting from many of the same safety and health hazards cited in the most recent inspection.

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The company engages in the research, development and manufacture of protein and fat products for nutritional applications and feeding regimes that include products such as pasteurized milk extenders, spray-dried protein encapsulated fats, dried whey permeates, and condensed whey and liquid whey products.

Under the Occupational Safety and Health Act of 1970, OSHA's role is to promote safe and healthful working conditions for America's working men and women by setting and enforcing standards, and providing training, outreach and education. For more information, visit <http://www.osha.gov>. ---OSHA

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3. **Employee complaints** involving imminent danger OR an employer violation that threatens death or serious physical harm,

4. **Referrals** from other agencies,

5. **Planned, or programmed, inspections in high-hazard industries,** and

6. **Follow-ups to previous inspections.**
--- OSHA

Resources

In these economic times it is important to use all resources to the maximum potential. We are your safety resource. Use us!

IRMA

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