

Safety Meetings are important!

They: get your employees actively involved
encourage safety awareness
help identify problems before they become accidents
motivate employees to follow proper safety procedures

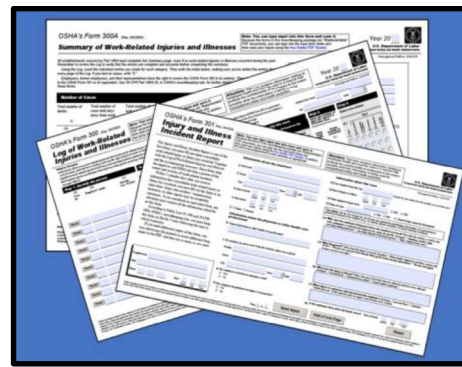
We are happy to provide you with a monthly topic for your agenda.

ROUTE TO:

- General Manager
- Safety Coordinator
- Supervisor Dept. _____
- Other _____
- Date of Meeting _____

December 2022

OSHA 300 Series



As the end of the year approaches it's a good time to gather your injury and illness records in preparation for the 300A posting (and electronic submission for most GAWDA members).

The OSHA 300A Summary must be completed even if there were NO work-related injuries or illnesses during the calendar year.

Overview for Recording Work-Related Injuries and Illnesses

Workplace Injuries and Illnesses must be recorded and the process includes THREE forms:

- **OSHA Form 300** – Log of Work-Related Injuries and Illnesses
any medical treatment beyond First Aid must be recorded on an OSHA 300 Log of Work-Related Injuries and Illnesses.

What must be recorded?

- Any medical treatment beyond First Aid must be recorded.
- Death
- Loss of consciousness
- Days away from work
- Restricted work activity or job transfer



When?

- Within 7 days after being informed of injury or illness
 - EXCEPTION:
 - Death - within 8 hours
 - Hospitalization, amputation, loss of eye - within 24 hours
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- **OSHA Form 301** – Injury and Illness Incident Report (or equivalent form) that records The detailed information about an injury/illness . For most states A Worker’s Compensation Report of Injury would be equivalent to the OSHA 301 because the Worker’s Compensation Report of Injury contains the same information as the OSHA 301 form.
 - **OSHA Form 300A** – Summary of Work-Related Injuries and Illnesses
By the end of January, of each year, a summary of Injury and Illnesses (OSHA 300a) must be completed, reviewed, certified and posted (Electronically and Physically)

Physical posting due Feb. 1, 2021

Electronic Submission due March 2, 2020.

<https://www.osha.gov/injuryreporting/>

Process:

1. **Complete OSHA 300A using data from OSHA 300 log**
2. **End of the year review:**
 - Review the OSHA 300 log for accuracy
 - Correct any mistakes
 - Create the Annual Summary (Form 300A)
 - Certify the summary
3. **Certify the summary**
 - An owner of the company (only if the company is a sole proprietorship or partnership);
 - An officer of the corporation;
 - The highest-ranking company official working at the establishment; *or*
 - The immediate supervisor of the highest-ranking company official working at the establishment



4. Post OSHA 300A:

- Physical posting:
OSHA 300A should be where notices to employees are usually posted.

- Electronic reporting:
Any employer with establishments with 250 or more employees must report electronically. Employers that have 20 or more employees and are deemed to be **HIGH RISK** by OSHA must also report electronically.

HIGH RISK industries include those companies that fill cylinders, requalify cylinders, sell compressed gases or welding supplies.

NAICS codes of **HIGH RISK** industries include:

325120- industrial gas manufacturing

423840- industrial supplies Merchant; Welding Supply wholesalers

424690- welding gases, other chemical and Allied products Merchant Wholesalers

454390- other direct selling establishments.

[Complete OSHA list of NAICS codes that must file electronically \(20-250 employees\)](#)

INSPECTIONS:

OSHA 300A records are generally reviewed by an OSHA inspector and there are five common mistakes:

1. Combining locations onto one OSHA 300A. Each physical location must have an OSHA 300A completed and posted.
2. If a location is opened anytime during the year, a 300A must be completed and posted; even if it is opened on the last day of the year.
3. If a location is closed anytime during the year then a 300A is NOT required to be completed.
4. A company executive has not signed the form.

A company executive may be:

- An owner of the company (only if the company is a sole proprietorship or partnership)
 - An officer of the corporation;
 - The highest-ranking company official working at the establishment; *or*
 - The immediate supervisor of the highest-ranking company official working at the establishment.
5. The 300A form must be posted from Feb 1 to Apr 30 each year, even if filed electronically.
 6. The 300A form must be posted in an area where employees are likely to view it; e.g. next to the OSHA safety posters or time clock.



Facility Securement

In day-to-day business operations we often forget the importance of facility securement even though many are located in “rough” areas. The GAWDA Safety Committee created a Facility Securement suggested safety practice. This template can be adapted for your company and used as a monthly or quarterly security audit. The complete document is available on the GAWDA website/ Members Only Document page/ Facility Securement.



Facility Securement (Insert Company Name Here)

PURPOSE	To provide a set of proposed guidelines for facility securement of welding distributors and fill plants.
RESPONSIBILITY	All personnel of the facility
AUTHORITY	Facility manager and or fill plant manager

1. Building

- a. Evaluate current facility design, use and limitations to determine specific access needs and requirements during regular hours of operation and after-hours usage.
- b. Minimize the number of entrances without compromising emergency egress. This can be accomplished by using door hardware that only opens from the inside.
- c. Magnetic locks can help to ensure doors fully close and latch after entry or egress is made.
- d. Limit key distribution and, if possible, use electronic card key access to monitor entry.
- e. Ensure all exits and entrances are properly marked properly and remain visible to facility personnel.
- f. Utilize camera/DVR system to ensure consistent monitoring of the facility with security system with alarm.
- g. Have an established hours of operation posted for all to see.
- h. Post signs on exit doors that state visitor sign-in requirements and warn that violators could be charged with trespassing.
- i. Provide communication devices such as intercoms or buzzers so that management can be alerted if a trespasser is present in a restricted area.
- j. Create a visitor sign-in, sign-out, and escort procedure.
- k. Use visitor ID badges.
- l. Secure custodial and delivery doors and keep records of deliveries.
- m. Have a protocol for securing the facility when closing.
- n. Assign specific tasks to specific personnel for securing facility.

2. Perimeter

- a. Establish total perimeter fencing with locking gates. When closed, the gap beneath a gate should not exceed 4 inches.
- b. Walls can be used to provide perimeter while limiting visual access to the property.
- c. Fencing and gates can be reinforced and protected from vehicular damage by using curbs, bollards, or guardrails.
- d. Maintain a clear zone of 5-10 feet on both sides of the fence. Materials and equipment should not be



positioned within the clear zone and decorative vegetation should be kept to heights of less than 2 feet.

- e. Lighting of the perimeter and outdoor areas can be used to improve safety, deter access, and promote detection and monitoring of unauthorized intrusion.
- f. Utilize camera/DVR system to ensure consistent monitoring of the outdoor areas, focusing on likely points of access.
- g. Position signage on perimeter fencing to address marking requirements for hazardous materials.
- h. Secondary fencing or additional security may be required for certain chemicals.

3. Vehicle Parking

- a. Do not park vehicles within the fencing clear zone.
- b. Remove vehicle keys and lock doors after parking.
- c. Remove high value items, such as data tablets or computers, from vehicle cab.

4. Electronic and Internet Security

- a. Firewall system in place for securing internet.
- b. Protocol in place for backing up the day's receipts, preferably off-site.
- c. Program for changing passwords at predetermined intervals.
- d. Provide employees with training to recognize and avoid phishing scams and similar attempt of cyber intrusion.

If you have any questions about either of these topics, how to subscribe to the CGA program or Any other OSHA, EPA or DHS questions please contact me.

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