



October 6, 2015

Larry Russ, Board Member
Tooley Water District
4730 Hwy 30 W
The Dalles, OR 97058

RE: Consultation Report 15-02099

Dear Mr. Russ:

Thank you for the opportunity to visit your workplace to conduct a comprehensive health consultation on September 24, 2015.

GENERAL SUMMARY: I'd like to first state how well you have done with your hazard communication, training, labeling, and personal protective equipment selection for your bleach use. You also have done a great job of identifying hazards and being proactive about preventing illness and injury to your volunteers. We visited your well sites and your reservoir and were able to identify some hazards in each. As promised I will include links and information in this report to assist you in improving your safety and health program.

Hazard Communication: While you had a written hazard communication program at each location and MSDS/SDSs available it did not appear that these were fully up to date with the new [Globally Harmonized System of Classification and Labeling of Chemicals](#) or GHS. Oregon OSHA in conjunction with Federal OSHA has revised its Hazard Communications Program to comply with the [Globally Harmonized System of Classification and Labeling of Chemicals](#). The GHS provides a more unified international harmonized system of standards to inform people about the chemicals present in their workplace and other environments. It will help; classify chemicals according to their hazard, and create a labeling system based on pictograms that are more universally understood.

The following are the major revisions to the Hazard Communication standard as adopted by Oregon OSHA.

- **Hazard Classification:** Chemical hazards will be determined by chemical manufacturers and importers. Specific criteria are provided for health and physical hazards as well as classification of chemical mixtures in the updated standard.

- **Labels:** Chemical manufacturers and importers will be required to use labels that include a signal word, pictogram, hazard statement and precautionary statement for each hazard class and category.
- **Safety Data Sheets (SDS):** For consistency, the revised sheets include 16 specific sections that must be completed. This system has replaced the current Material Safety Data Sheet (MSDS) based format.
- **Training:** Training has been required on the new label elements and the safety data sheet format since December 1, 2013.

Rule: [1910.1200 Hazard Communications](#)

Booklet: “[Oregon OSHA’s guide to the GHS-aligned Hazard Communication Standard](#)”

Sample Programs: [A written Hazard Communication Plan](#)

[Example of a Hazard Communication training form](#)

[Example of an employee training record](#)

[Example Hazard Communication Plan in Spanish](#)

You had your own hazard communication program you created without a template. While I did provide a template for you to use I think your current program does an excellent job of very specifically addressing the hazards of the chemicals you use. My recommendation would be to keep your current program but just add portions stating how you will review your plan annually and to specify how the training requirements are met. You can obviously use the template provided, however I think your step by step approach is more informative.

Noise: We spoke about the use of weed whackers onsite and the potential for high noise exposures during this activity. The weed whackers were not available during the consultation so a noise reading could not be taken. You expressed interest in receiving a table and information on how to take your own noise readings. You can rent sound monitoring equipment, have your workers compensations carrier provide monitoring, or have Oregon OSHA perform the monitoring for you. As of 2014 there are also several apps for smartphones that have been identified by NIOSH as having a +/- accuracy of 2 dBA in the A-weighted scale (same scale used by OSHA). These apps are the SoundMeter, NoiSee, and Noise Hunter. All these apps are only evaluated at this level of accuracy for iOS devices. These apps could be used to identify high noise processes and in conjunction with table 1 be used to estimate when and for which employees a hearing conservation program may be necessary. Keep in mind that all noise exposures above 80 dBA should be counted towards the employee’s exposure time.

Oregon OSHA's hearing conservation rule has specific requirements when noise exposures exceed an average of 85 dBA over an 8 hour workday and additional administrative and engineering requirements when noise exposure levels exceed an eight hour average of 90 dBA.

| Sound Level in dBA | Exposure Time (hrs) |
|--------------------|---------------------|
| 85 | 8 |
| 88 | 5 hrs 17 min |
| 90 | 4 |
| 95 | 2 |
| 100 | 1 |
| 105 | 1/2 |
| 110 | 1/4 |

These five basic components comprise an effective Hearing Conservation Program:

- Exposure Monitoring
- Audiometric Testing
- Hearing Protection
- Employee Training
- Recordkeeping

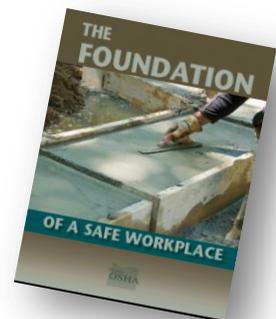
Please reference the following links for more information on hearing conservation: [Oregon OSHA's noise topic page](#) ; [A Quick Guide to Hearing Protection](#)

In your particular case with volunteers working sparingly I would not recommend investing in a hearing conservation program. My recommendations would be to continue your practice of requiring hearing protection and to take sound level readings and use the table above to determine a time limit for how long volunteers can perform weed whacking without exceeding the 85 dBA TWA action level.

SAFETY AND HEALTH MANAGEMENT: Oregon OSHA sees managing safety and health in the work place as a proactive way to control and eliminate injuries and illnesses in the work place; this includes accountability in the work place.

Oregon OSHA has boiled this management system down to seven basic elements:

- 1) Management leadership
- 2) Hazard anticipation and detection
- 3) Hazard prevention and control
- 4) Planning and evaluation
- 5) Administration and supervision
- 6) Safety and health training
- 7) Employee participation



For more information on how these seven elements can help you further manage safety and health in your work place, you can give us a call, or reference the booklet titled [Foundation of a Safe Workplace](#).

SAFETY COMMITTEE: During our discussions you mentioned your safety meetings and it sounded like they are being performed at least monthly and the minutes are being recorded.

Keep it up! To assist you in topics and in improving your safety meetings I have included the following attachments.

[Form for describing an accident or incident](#)
[Form for investigating an accident](#)
[Form for investigating an accident or incident](#)
[Form for reporting a hazard or other safety concern](#)
[Form for reporting an overexertion injury](#)
[How to conduct an accident investigation](#)
[Minutes from safety committee](#)
[Safety and health policy for centralized safety committees](#)
[Safety committee bylaws](#)
[Safety committee evaluation checklist](#)
[Sample safety and health policy statement](#)
[Self Assessment Checklists](#)
[Online training](#)

Attached you will find the “Hazard Identification and Correction” work sheets which list the hazards observed during the consultation. The observations and recommendations made in this report are designated as SERIOUS (S) or OTHER THAN SERIOUS (OTS) based upon probable severity if an injury or illness were to occur. SERIOUS hazards are those situations or conditions which could result in serious illness, physical harm or death. OTHER THAN SERIOUS hazards are those situations or conditions which could result in employee injury or illness of a less serious nature. These designations are intended to help you prioritize corrective action. You should develop an action plan to ensure prompt correction of these identified hazards. Your company is exempt from a routine scheduled Oregon OSHA inspection at this location for 60 days from the date of this report. As mentioned during the consult, this does not exempt your company from enforcement action in the event of an accident investigation, a complaint, referral, or the observance of an imminent danger.

During the consultative visit, I attempted to identify all hazards. However, there may be some hazards that were not seen or identified. It remains the responsibility of the employer to ensure the safety and health of employees and to identify and correct all hazardous conditions and/or situations. This report cannot result in enforcement activity, nor can Oregon OSHA Enforcement use this report as a basis for citation. Information provided is not a formal endorsement of any vendor or product.

Oregon OSHA values your feedback. Please take a few moments to assist us in improving consultative services. In the next few days, you will receive an email with a link to our online survey. If multiple consultations (safety, ergo, health) were completed within the same time frame, you will receive multiple emailed links. Each survey is specific to the services provided; please provide feedback that is pertinent to that particular consultation.

Thank you for requesting our assistance to improve safety and health in your workplace. If there are any questions regarding occupational safety and health issues, please feel free to contact me.

Respectfully,

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HAZARD IDENTIFICATION AND CORRECTION

Oregon Occupational Safety and Health Division

Consultation Services

Firm Name: Tooley Water District
Consultation Date: September 24, 2015 - September 24, 2015

Report Number: 15-02099

S = Serious OTS = Other Than Serious

| No | Item | Location | S | O T S | Recommended Action | Assigned To | Due Date |
|----|--|----------------|---|-------------|--|-------------|----------|
| 1 | An electrical outlet was plugged into another electrical outlet when that was not the approved use of that outlet. The cords were also spliced with electrical tape. Rules: 1910.305(g)(2)(ii) | Well Head 1 | ✓ | | Unplug and remove the electrical outlet and cord from service. | | |
| 2 | Guards were not in place to prevent employees for entanglement in rotating equipment on the water pumps in the lower reservoir room. Rule: 1910.219(c)(3) | Reservoir | | ✓ | Build or purchase guards to protect employees from contact with the rotating shafts. | | |
| 3 | Belt for air compressor in upper room of reservoir was unguarded. Rule: 1910.219(e)(1)(i) | Reservoir | | ✓ | Build or purchase guards to protect employees from contact with the belt. | | |
| 4 | The required training on the new Globally Harmonized System of Classification and Labeling of Chemicals, better known as (GHS) has not been completed. | Administrative | | ✓ | See the hazard communication section of this report for more information. | | |

**HAZARD IDENTIFICATION AND CORRECTION
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| | Rule: 1910.1200(j)(1) | | | | | | |