

OSHA CITATION ABATEMENT



Catalyst Group

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OSHA Citation Abatement: Training and Guidance

Executive Summary

An employee of our client, a publicly-traded global chemical manufacturer, had sustained injuries that prompted an OSHA investigation and subsequent citation. The client engaged us to provide training, guidance and support for Machine Risk Assessments. The Catalyst Group provided the instructors and lead risk-assessors for

this on-site project. Following the 10 days of intensive, hands-on risk assessments and training, the client had a clear understanding of OSHA's Lockout Tagout (LOTO) "Minor Servicing Exception" found in 29 CFR 1910.147(a)(2)(ii)(B). They were able to determine applicability to their operations and complete the risk assessments for their full set of production equipment. The post-assessment changes to safeguards and procedures not



only made the operation and maintenance tasks safer for the client's associates, but also reduced production downtime.

Challenges

Prior to our training, the client's employees did not have a clear understanding of when they could and when they could not apply OSHA's "Minor Servicing Exception". In addition, the client's complex, automated equipment had been manufactured in Europe by designers who had only a limited understanding of US regulatory requirements. Our team of experts had to conduct an in-depth review of the equipment design engineering drawings, as well as the operation and maintenance tasks before work could begin.

How We Helped

The Catalyst Group's team of consultants performed two very important tasks to assist the client in abatement of OSHA citations:

First, we prepared and delivered a two-hour training session on the interpretation and applicability of OSHA's LOTO "Minor Servicing Exception" found at 29 CFR 1910.147(a)(2)(ii)(B). The findings from a recent audit and injury investigation indicated that there was a potential knowledge gap regarding this interpretation. Site

personnel who were assigned to support the safe operation and maintenance of the production equipment needed to understand the requirements and how to determine when and where they were applicable.

Second, we provided on-site field training and support for conducting Machine Risk Assessments for their major production equipment. We provided leadership and guidance to small site teams of engineering, maintenance, and EHS professionals as they conducted the risk assessments. We designed the Machine Risk Assessment to facilitate the identification of the existing methodology for accessing and servicing equipment, and to determine if the OSHA LOTO exception is (or could be) applied. Based on the risk assessment, equipment usage and servicing information, and the application of OSHA guidance, we documented the current state and any corrective and preventative actions that were needed to comply with OSHA requirements and ensure the safety of personnel.

Results

After an intense 10 days on site with our client, they had a deeper understanding of OSHA's LOTO standard as well as when and how to apply the exception. This resulted in a safer work environment, compliant work activities and improved productivity. Today, we continue to work with this client to provide comprehensive HSE services.

About Us

A premier global consultancy, The Catalyst HSE Group is trusted by clients to manage their most challenging environmental, health and safety issues.

Our reputation has been built on a foundation of solid technical and scientific excellence, innovation and client service. Our independent science-first approach ensures that our strategic advice is objective and defensible. We apply integrated multi-disciplinary services and tailor each solution



to our client's specific needs and challenges. This approach transforms us from a company that just delivers a service to one that is a true partner in risk minimization.

Contact Us

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