



# "The Public Interest"

## Health/Safety and Environmental Issues

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Public Agency Safety Management Association

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Front Page: **A Word About JSA's - a T8CCR3203 IIPP requirement.**

### Individual Highlights:

VALLEY FEVER - ALERT 2-3  
JSA/JHA EXAMPLE 4

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### Editor's Message

## "A Word About JSA's"

By: Dick Monod de Froideville

Observational data I've accumulated as a Cal/OSHA Compliance Officer suggests that employers have difficulty deciphering critical terms found in T8CCR3203 (IIPP) such as "system", "procedure", "methods" and most importantly "effective". Commonly found in other performance standards such as Confined Space, Fall Protection and L.O.T.O they require a definition that is based on the employer's knowledge of their work processes and equipment and preferably not on a CSHO's after the fact. The problem with most safety and health programs is that these words are RECOGNIZED and included but not DEFINED. Ergo, the employer is precluded from articulating and most importantly from DEMONSTRATING that they are complying with both spirit and letter of the code thereby creating an exposure risk to regulatory action.

Arguably, this definitional disconnect is best corrected by inclusion and deployment of a long-standing H&S trade term, the **Job Safety/Hazard Analysis**; or the proof of the pudding. JSA's are the "recipes" of the term "system" in many regulations and by their absence precludes a defense as to the efficiency and compliance of H&S programs. Categorically then, the question CSHO's will ask as to any Health and Safety standard such as "perform routine and/or periodic inspections" and/or "correct in a timely fashion" is **HOW**.

Performing this critical JSA/JHA function, however, is simply not complete without the inclusion of a Risk Assessment Matrix as an integral part of the JSA. The risk assessment compares the frequency of the activity and the extent and severity of the injury/illness in the event of a mishap. Doing so will automatically alert the evaluator to assign a timely numeric date value for correction. When done correctly and meticulously, this information is based on documented analysis and application of logic.

Additionally, this JSA/JHA function is a waste of resources if it is performed by employees not having the skills to engage in this endeavor. Performing the JSA/JHA requires observational, analytical, logic and people skills to maintain the credibility of this risk management tool. Having said that, it is equally important that this function be conducted for the general class of job descriptions and should be scaled down prior to any specific complex and/or compound job task.

Lastly, in order for the JSA to be realistic, effective and efficient it should be a collaborative effort between Safety, Supervisors and the affected employee. This team approach is an opportunity to train, retrain and enforce individual and organizational safety behavior and culture. I would also argue that "duty statements" be generated and/or amended to require affected employees to initiate a JSA prior to a complex and/or compound or new tasks...and that duty statement should also have an enforcement provision.

For more information Google the search term(s) JSA/JHA forms; JSA/JHA training and let's tighten up our process.

## **Advice to Employers and Employees Regarding Work-related Valley Fever**

<https://www.dir.ca.gov/dosh/valley-fever-home.html>

A recent cluster of work-related cases of Valley Fever at two solar installation plants in the Central Valley has drawn attention to the related health risks faced by many California workers whose jobs may expose them to fungal spores found in soil.

### Information for Employers

- Employers have a legal responsibility to immediately report to Cal/OSHA any serious injury or illness, or death (including any due to Valley Fever) of an employee occurring in a place of employment or in connection with any employment. Employers also have responsibilities to control workers' exposure to hazardous materials.
- Applicable regulations with regard to Valley Fever protection and exposure can be found in the California Code of Regulations, Title 8, sections
  - [342](#) (Reporting Work-Connected Fatalities and Serious Injuries),
  - [3203](#) (Injury and Illness Prevention),
  - [5141](#) (Control of Harmful Exposures),
  - [5144](#) (Respiratory Protection) and
  - [14300](#) (Employer Records-Log 300).
- Cal/OSHA has issued citations to several employers following investigation of confirmed cases of Valley Fever contracted at the California Valley Solar Ranch and the Topaz Solar Farm in Santa Margarita. Those citations can be viewed on the Cal/OSHA [Notable Citations](#) page.

### **How can Valley Fever be Prevented?**

While there is no vaccine to prevent Valley Fever, the following steps are important to take in order to limit risk:

- Determine if your worksite is in an endemic area.
- Adopt site plans and work practices that reduce workers' exposure, which may include:
  - Minimize the area of soil disturbed.
  - Use water, appropriate soil stabilizers, and/or re-vegetation to reduce airborne dust
  - Stabilize all spoils piles by tarping or other methods.
  - Provide air conditioned cabs for vehicles that generate heavy dust and make sure workers keep windows and vents closed.
  - Suspend work during heavy winds.
  - Onsite sleeping quarters, if provided, should be placed away from sources of dust.
- When exposure to dust is unavoidable, provide NIOSH-approved respiratory protection with particulate filters rated as N95, N99, N100, P100, or HEPA. Employers must develop and implement a respiratory protection program in accordance with Cal/OSHA's Respiratory Protection standard (8 CCR 5144).
- Take measures to reduce transporting spores offsite, such as:
  - Clean tools, equipment, and vehicles before transporting offsite.
  - If workers' clothing is likely to be heavily contaminated with dust, provide coveralls and change rooms, and showers where possible.
- Identify a health care provider for occupational injuries and illnesses who is

**Valley Fever – Prevention Continued**

- knowledgeable about the diagnosis and treatment of Valley Fever
- Train workers and supervisors about the risk of Valley Fever, the work activities that may increase the risk, and the measures used onsite to reduce exposure. Also train on how to recognize Valley Fever symptoms.
- Encourage workers to report Valley Fever symptoms promptly to a supervisor. Not associating these symptoms with workplace exposures can lead to a delay in appropriate diagnosis and treatment.

**OCCUPATIONS AT RISK**

**Construction workers and other workers on construction sites, including road building and excavation crews  
Archeologists  
Geologists**

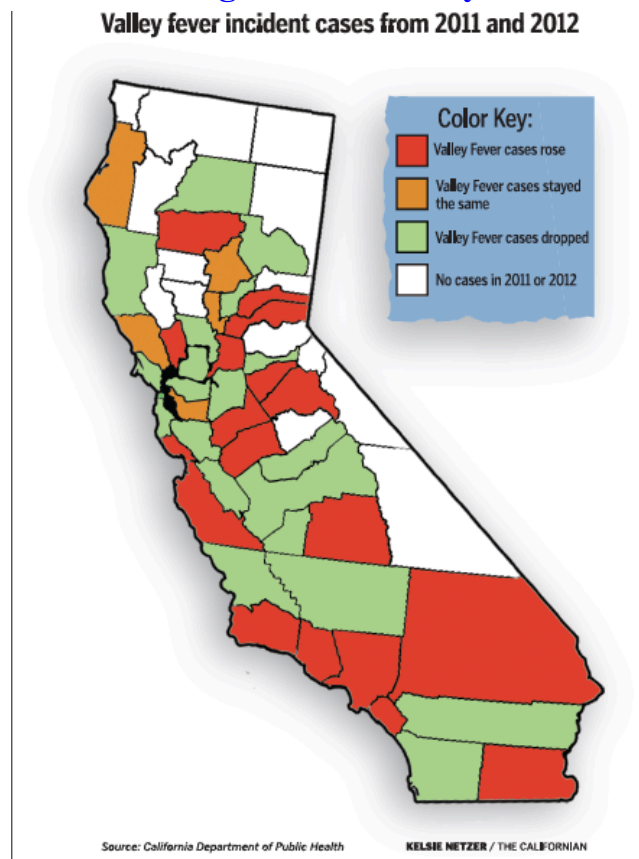
**Wildland firefighters  
Military personnel  
Workers in mining, quarrying, gas and oil extraction jobs  
Agricultural workers\***

\* Cultivated, irrigated soil may be less likely to contain the fungus compared to undisturbed soils.

**More Resources ...**

- [California Department of Public Health Valley Fever informational page](#)
- [Kern County Public Health Services Department Valley Fever Website](#)
- [Center for Disease Control and Prevention Valley Fever informational page](#)
- [Valley Fever Americas Foundation](#)
- [University of Arizona – Valley Fever Center for Excellence](#)

**<https://www.dir.ca.gov/dosh/valley-fever-home.html>**



### JSA/JHA EXAMPLE

<b>Picture of task/equipment:</b>	<b>Task:</b>	<b>Band Saws</b>	
	<b>Name of Shop or Dept:</b>	OCH-Carpenter shop	
	<b>Job Title(s):</b>	Carpenter, Assistant	
	<b>Analyzed by:</b>	M. Williams	
	<b>Date:</b>	05/02/13	
<b>Required PPE:</b>			
Work boots 	Dust mask 	Hearing protection 	Safety glasses 
<b>Required/Recommended Trainings:</b>			
STF Safety	Machine guarding	Equipment safety precautions	
<b>TASK</b>	<b>HAZARDS</b>	<b>CONTROLS</b>	
<p><b>Operating a stationary band saw</b></p> 	<p>Lacerations Amputations Struck By's Slips Falls</p>	<ul style="list-style-type: none"> <li>Don PPE, including work shoes with non-slip soles a dust mask and safety glasses.</li> <li>Hearing protection should be worn when noise levels are elevated from machinery in the shop.</li> <li>Keep guards in place, do not bypass</li> <li>Make sure work area is clean and well light.</li> <li>Keep loose clothing, hair and jewelry away from moving parts.</li> <li>Always allow the motor to come to full speed before cutting.</li> <li>Never start the equipment when the blade is in contact with a work piece.</li> <li>Ensure work piece is flat against work table, never attempt to cut work at elevated heights; this will cause the work piece to move down with the blade and can cause injury.</li> <li>Never cut more than one piece at a time.</li> <li>Blade will coast when it is turned off. Do not remove jammed or cut off pieces until the blade has come to a complete stop.</li> <li>For smaller pieces use a clamp or vice grip to secure or for safe maneuverability.</li> <li>Always support larger pieces to avoid them from tilting and pinching the blade. Saw blade cut slip, walk or slide while cutting large or heavy pieces.</li> </ul>	