



Voice of the Recycling Industry



Moving Safety Forward in 2022

Safety Message

Blind Spot Awareness



President's Path out of the Pandemic

- Sept 9, 2021, President Biden announced a new action plan which affects:
- Federal Employees, Federal Contractors, and Health Care Entities
- President also directed OSHA to issue an emergency temporary standard (ETS) mandating that **employers with at least 100 employees** require their employees to either be **fully vaccinated** or **present a negative COVID-19 test result at least once a week**.
- ETS will also require covered employers to provide employees paid time off to get vaccinated and to recover from the associated side effects of vaccine.

OSHA ETS – effective 11/5/2021

Key Dates:

- **December 5, 2021** – Employers must provide paid time off to receive vaccines and recover from side effects; unvaccinated employees must wear face masks when inside
- **January 4, 2022** – Deadline for employees to be fully vaccinated or tested on a weekly basis

Employers must:

- Determine the vaccination status of each employee and obtain acceptable proof of vaccination
- Maintain records and a roster of each employee's vaccination status
- Require employees, regardless of vaccination status, to provide prompt notice upon receiving a positive COVID-19 test result or diagnosis of COVID-19 by a licensed health care professional, remove them from the workplace and keep them out until return to work criteria are met
- Report work-related COVID-19 fatalities to OSHA within 8 hours and work-related COVID-19 in-patient hospitalizations within 24 hours of the employer learning about them

OSHA ETS – effective 11/5/2021

For Vaccinated Employees:

- Employees will need to have either two doses of the Pfizer or Moderna vaccine or one dose of the Johnson & Johnson vaccine no later than **January 4, 2022**, to be fully vaccinated
- Employers must provide up to four hours of paid time to receive each primary vaccination dose as well as reasonable time and paid sick leave to recover from any side effects experienced following each primary vaccination dose beginning **December 5, 2021**

For Unvaccinated Employees:

- Employers must ensure all unvaccinated employees produce a verified negative test for COVID- 19 on at least a weekly basis beginning **January 4, 2022**
- Unvaccinated employees must wear face masks beginning **December 5, 2021**, when indoors or when occupying a vehicle with another person for work purposes
- The OSHA ETS does not require employers to provide or pay for tests nor does it require them to pay for face masks. *(Employers may be required to pay for testing because of other laws or collective bargaining agreements.)*

OSHA ETS – effective 11/5/2021

The requirements of the ETS do not apply to:

- Employees who do not report to a workplace where other individuals are present
- Employees while working from home
- Employees who work exclusively outdoors
- Those covered by either the Federal Contractor guidance or Healthcare ETS

These rules preempt any inconsistent state or local laws, including laws that ban or limit an employer's authority to require vaccination, masks or testing.

In States with OSHA-approved State Plans, this ETS does not significantly limit State policy options. Any special workplace problems or conditions in a State with an OSHA-approved State Plan may be dealt with by that State's standard, provided the standard is at least as effective as this ETS.

OSHA ETS – effective 11/5/2021

OSHA plans to have programmed or planned inspections, where agents go into workplaces to check that the workplace is in compliance with the rule. **For what OSHA refers to as willful penalties, a company can be fined \$136,532.** (The standard penalty is \$13,653 for a single violation and the number would increase if there are multiple violations in a workplace.)

<https://www.osha.gov/coronavirus/ets2/faqs>

Federal Contractor COVID-19 Vaccination Requirement

For more information,
follow these links:

[Guidance for Federal Contractors and Subcontractors](#)

[Executive Order on Ensuring Adequate COVID Safety Protocols for Federal Contractors](#)

<https://www.saferfederalworkforce.gov/faq/vaccinations/>

The Biden administration has released details on requirements for federal contractors to have their employees vaccinated for COVID-19. Covered contractors must have employees fully vaccinated by December 8, 2021, except for those employees who qualify for a legal accommodation. Exceptions for federal workers and federal contractors include a disability or a sincerely held religious belief, practice, or observance.

Employees are considered fully vaccinated two weeks after receiving the requisite number of doses of a COVID-19 vaccine approved or authorized for emergency use by the U.S. Food and Drug Administration or that has been listed for emergency use by the World Health Organization. This requirement means a covered employee must have received his or her final dose two weeks before the December 8th deadline.

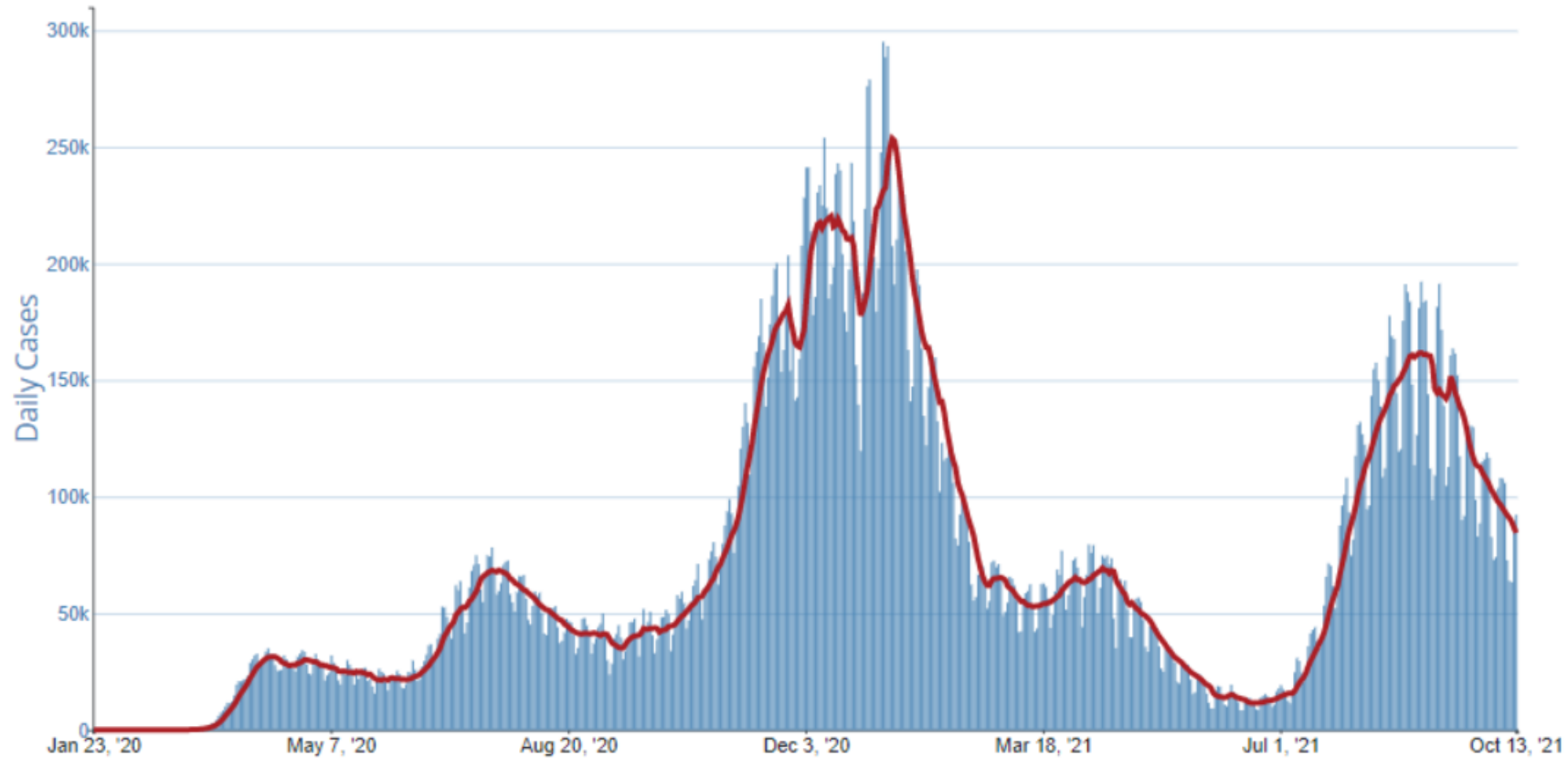
OSHA Citations and Complaints

- See OSHA website for posted activities since pandemic began
 - <https://www.osha.gov/enforcement/covid-19-data>
 - <https://www.osha.gov/coronavirus/standards>
- OSHA Nat'l Emphasis Program – COVID-19
 - https://www.osha.gov/sites/default/files/enforcement/directives/DIR_2021-03_CPL_03.pdf
- Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace
 - <https://www.osha.gov/coronavirus/safework>

OSHA Citations and Complaints

- 18,474 Federal complaints/referrals Feb 1, 2020 to Sep 9, 2021
 - Resulting in 2,861 opened inspections
- Since OSHA's Nat'l Emphasis Program for COVID-19 was issued March 12, 2021
 - 1,010 Federal inspections have been opened
- Most frequently cited COVID-19 related standards
 - 1910.134 (Respiratory Protection) – 62% of standards cited
 - 1904.4 (Recordkeeping) – 14% of standards cited
 - 1904.39 (Reporting) – 11% of standards cited
 - 1910.132 (PPE) – 3% of standards cited
 - OSH Act Section 5(a)(1) (General Duty Clause) – 2% of standards cited

COVID-19 Update



https://www.cdc.gov/coronavirus/2019-ncov/covid-data/covidview/10152021/images/cases_1015021.jpg?_=98372

<https://covid.cdc.gov/covid-data-tracker/#datatracker-home>

Safety 2022 Initiatives

Institute of Scrap Recycling Industries (ISRI)

Serious Injury & Fatality (SIF) Prevention

- PSIF Awareness
- Understanding the critical risks of your operation

Fire Safety and Prevention Education & Training

- Possible through OSHA Susan Harwood Training grant
- Free class virtual or in-person education & training
- Can register at www.isri.org

Outreach Education & Training

- Fire Safety & Prevention E & T class.
- Held in-person & virtual classes – student feedback all positive & constructive.
- ISRI was awarded a continuation of the grant funding to be used towards Fire Safety E&T.
- ISRI will continue with face-to-face and virtual fire safety & prevention education and training through 2022.

To register for this free online class → [CLICK HERE](#)

Key discussion points include:

- Inbound Source Control, Potential Ignition and Fuel Sources.
- Housekeeping and Facility Auditing Practices.
- Safe Hot Work Practices and Compressed Gas Cylinder Safety.
- Incipient Stage Fire Fighting and Ways to Work with Your Local FD.
- Class includes quizzes/check-ins and student evaluation of content and delivery.
- All class materials will be available for download on ISRI website by end of 2021.



Voice of the Recycling Industry



Serious Injury & Fatality (SIF) Prevention Program

SIF Definition

A serious injury or fatality (SIF) is any injury that resulted in:

- Fatality
- A life-threatening injury or illness
 - **If not immediately addressed is likely to lead to death of the affected individual and will usually require intervention of internal and/or external emergency response personnel to provide life-sustaining support.**
- A life-altering injury/permanent disability
 - **That results in permanent or long-term impairment or loss of use of an internal organ, body function or body part.**

SIF Examples

Examples include but are not limited to:

- Fatality
- A life-threatening injury or illness
 - **Laceration or crushing injuries that result in significant blood loss**
 - **An injury involving damage to the brain or spinal cord**
 - **An event that requires application of CPR or an external defibrillator**
 - **Chest or abdominal trauma affecting vital organ**
 - **Serious burns**
- A life-altering injury/permanent disability
 - **Significant head injuries**
 - **Spinal cord injuries**
 - **Paralysis**
 - **Amputations**
 - **Broken or fractured bones**
 - **Serious burns**

The Issue.....

- Injury rates have dropped in the USA significantly over the past 20 years by more than 50% and that's good news!
- However, the fatality rate has not seen any noticeable drop in the same time period.

The Issue.....

- The Scrap Recycling industry is working hard to reduce illness & injury rates and incidents.
- Even though rates are trending downward we are still seeing workers suffer from debilitating and fatal injuries.

Safety is.....

Controlling Exposure for SELF and OTHERS

- Path forward towards reducing serious injuries, fatalities, and incidence rates for ISRI members.
- **Potentially Serious Incident or Fatality (PSIF)**
 - These are work-related incidents that did not result in a serious or fatal injury, but had the potential if circumstances had been different.
 - Incidents where the last barrier failed and only luck prevented serious or fatal injury.
 - These are near misses that if an injury were to have occurred, the injury would have met the definition for a SIF

Video to Watch:

<https://www.youtube.com/watch?v=myNSOBv18uY>

We Believe.....

- By identifying potential serious injury or fatality (PSIF) events and treating them as if they are actual serious injuries...
- You can narrow your focus and identify the specific PSIF hazards within your particular type of working environments.

PSIF Areas of Your Operations

- **Lifting & Rigging (Mobile Equipment Use)**
- **Hazardous Energy (Lock-Out Tag-Out Try-Out)**
- **Caught-in or Between (Machine Guarding)**
- **Struck-by flying objects or moving equipment (Machine Guarding and Mobile Equipment)**
- **Fall Exposures (Fall Protection & Prevention)**
- **Atmospheric Hazards (Confined Space & IH Issues)**
- **Fire (beyond incipient stage)**
- **Explosions and/or Projectiles (compressed gas cylinders)**
- **Other Distractions (cell phone use / headphone use)**
- **What/Where Else in YOUR Operations???**

Questions to ask:

- What is your Prevention Strategy?
- How will you control these exposures?
- Determine if they will require an Employee Focus (Admin Controls or PPE)
- Determine if they will require an Engineering Focus (Substitution or Elimination)
- To REDUCE and ELIMINATE SIFs you and your Team have to Identify the **POTENTIAL AREAS OF SIF EXPOSURE** or **YOUR AREAS OF CRITICAL RISK**

Actions to take:

1. Educate your company's leadership
2. Measure SIFs and High Potentials as ONE category
3. Develop processes in your operations to identify and mitigate precursors
4. Integrate these methods into your existing safety program



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Moving Safety Forward

Illness & Injury Data from BLS

TRIR	2017	2018	2019
BLS	3.1	3.1	3
Scrap Recyclers (42393)	-	5.1	3.3
MRFs (56292)	9.8	4.9	3.6

DART	2017	2018	2019
BLS	1.6	1.7	1.6
Scrap Recyclers (42393)	-	3	1.9
MRFs (56292)	5.8	3.6	2.8

- Rates are trending downward 2017 – 2019
- Rates are still higher than average
- Targeting directive will run for 2 years unless replaced by a new instruction

Site Specific Targeting (SST) -

<https://www.osha.gov/enforcement/directives/cpl-02-01-062>

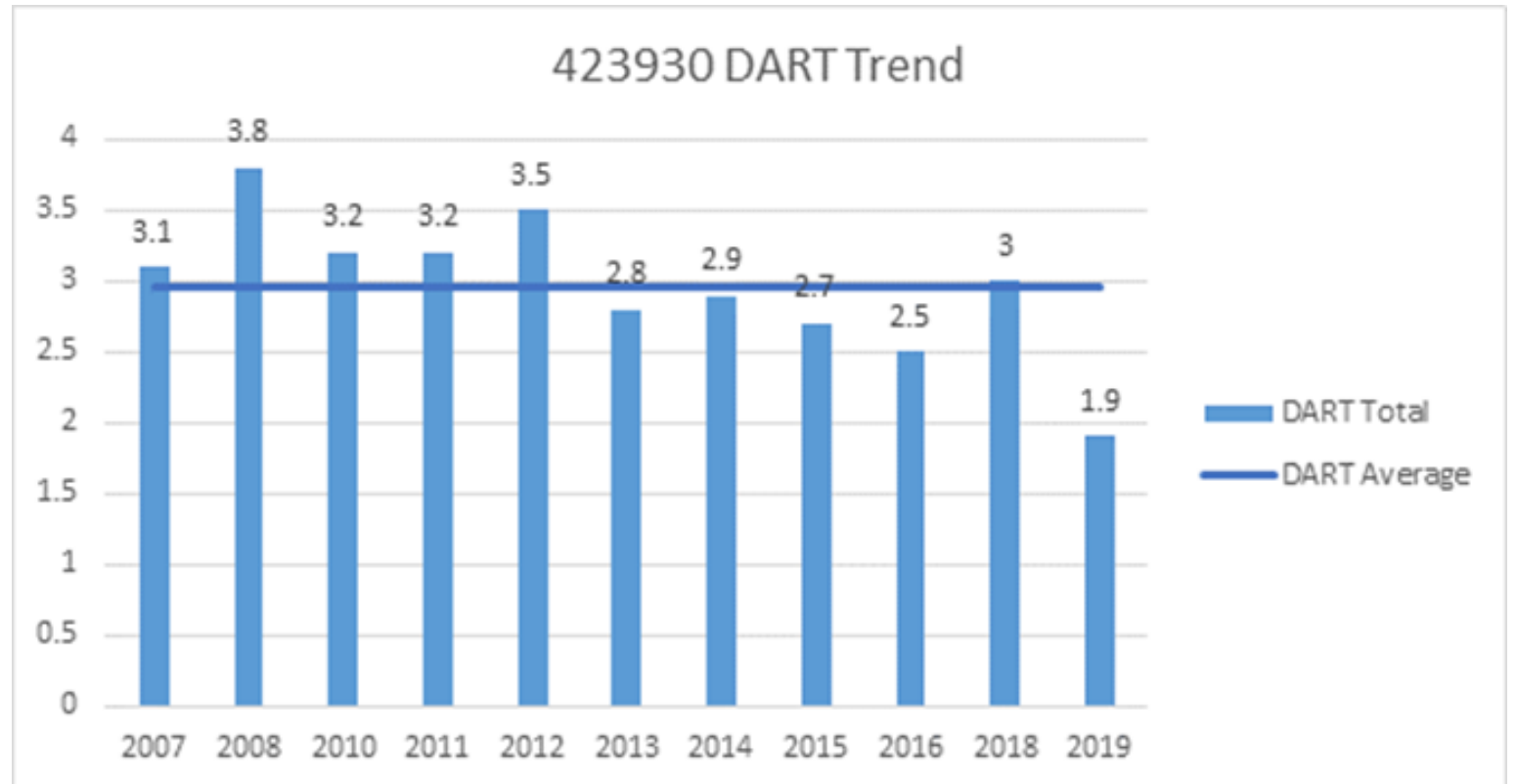
Illness & Injury Data

NAICS 423930

Recyclable material merchant wholesalers

DART Rate =
Days Away,
Restrictions, or
Transfers

Industry 10 yr avg – **2.95**
Industry 3 yr avg (current) – **2.46**
BLS 3 yr avg (current) – **1.63**





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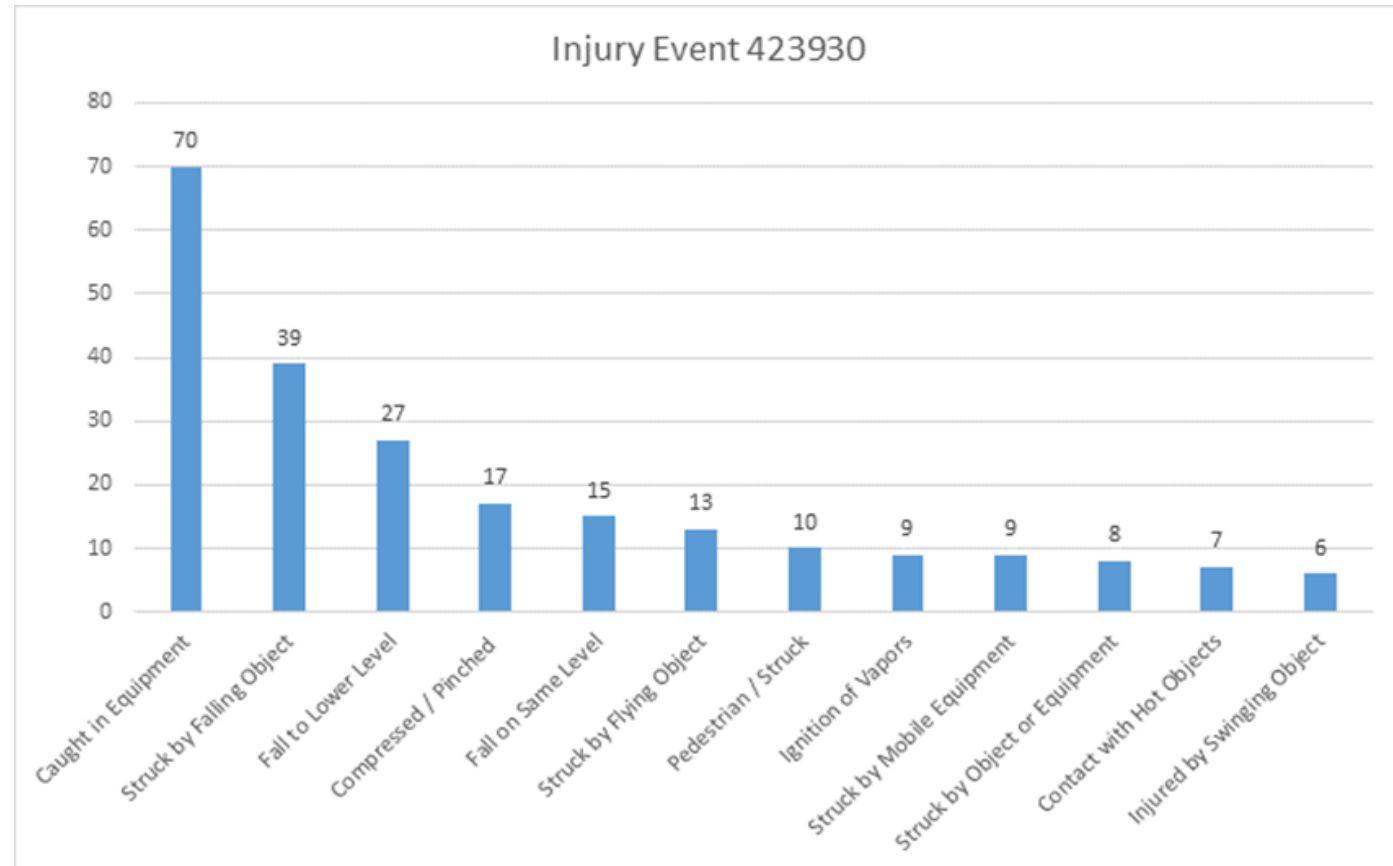
Injury Types, Facility Location, Body Part

Illness & Injury Type - how

NAICS 423930

Recyclable material merchant wholesalers

- Caught in equipment
- Struck-by falling object
- Falls to lower level
- Compressed / pinched
- Falls on same level
- Struck-by flying object
- Pedestrian / struck
- Ignition of vapors
- Struck-by mobile equipment
- Contact with hot objects
- Injured by swinging object

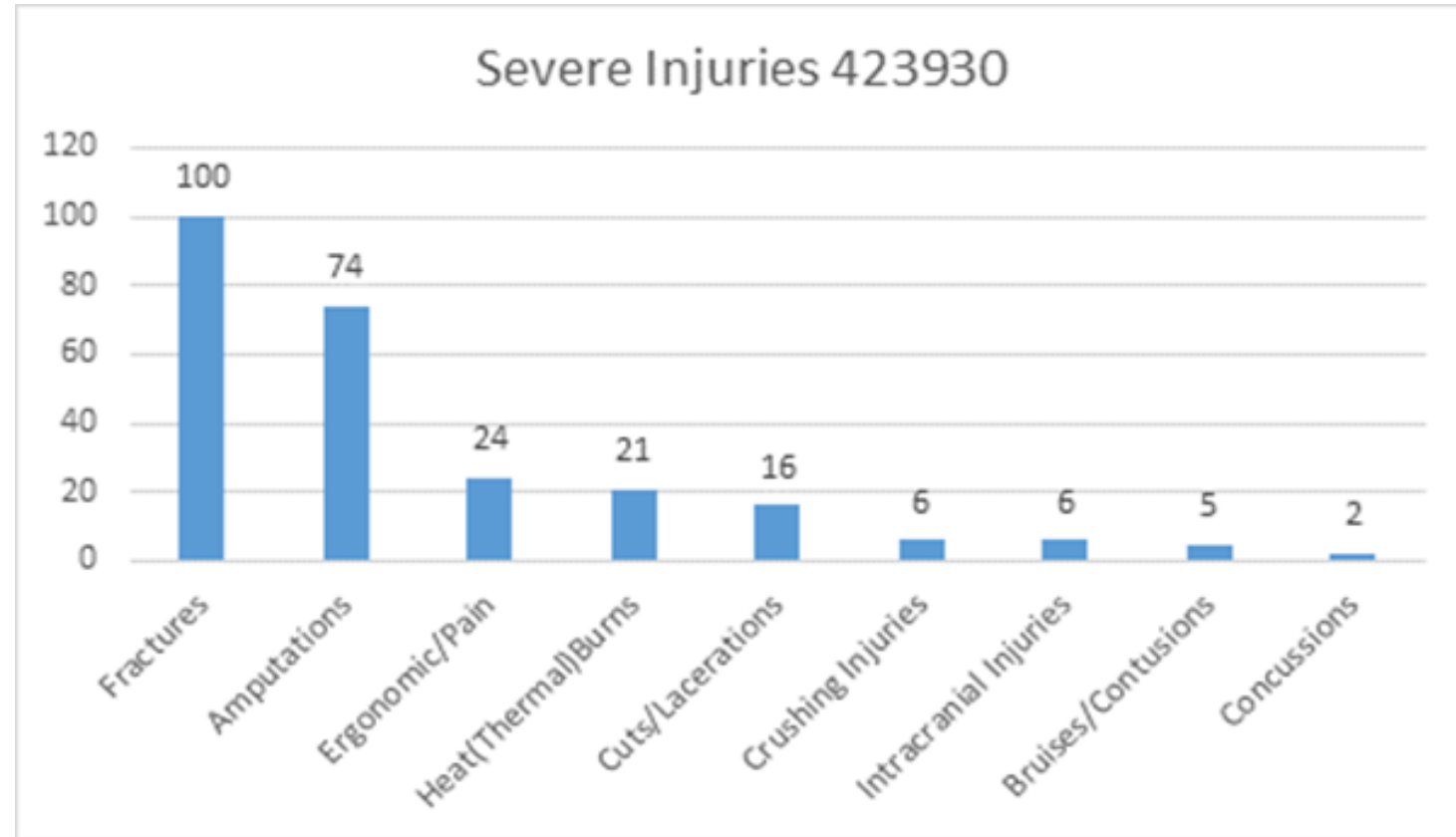


Illness & Injury Data – what happened

NAICS 423930

Recyclable material merchant wholesalers

- Fractures
- Amputations
- Ergonomic / pain
- Heat (thermal) burns
- Cuts / lacerations
- Crushing injuries
- Intracranial injuries
- Bruises / contusions
- Concussions

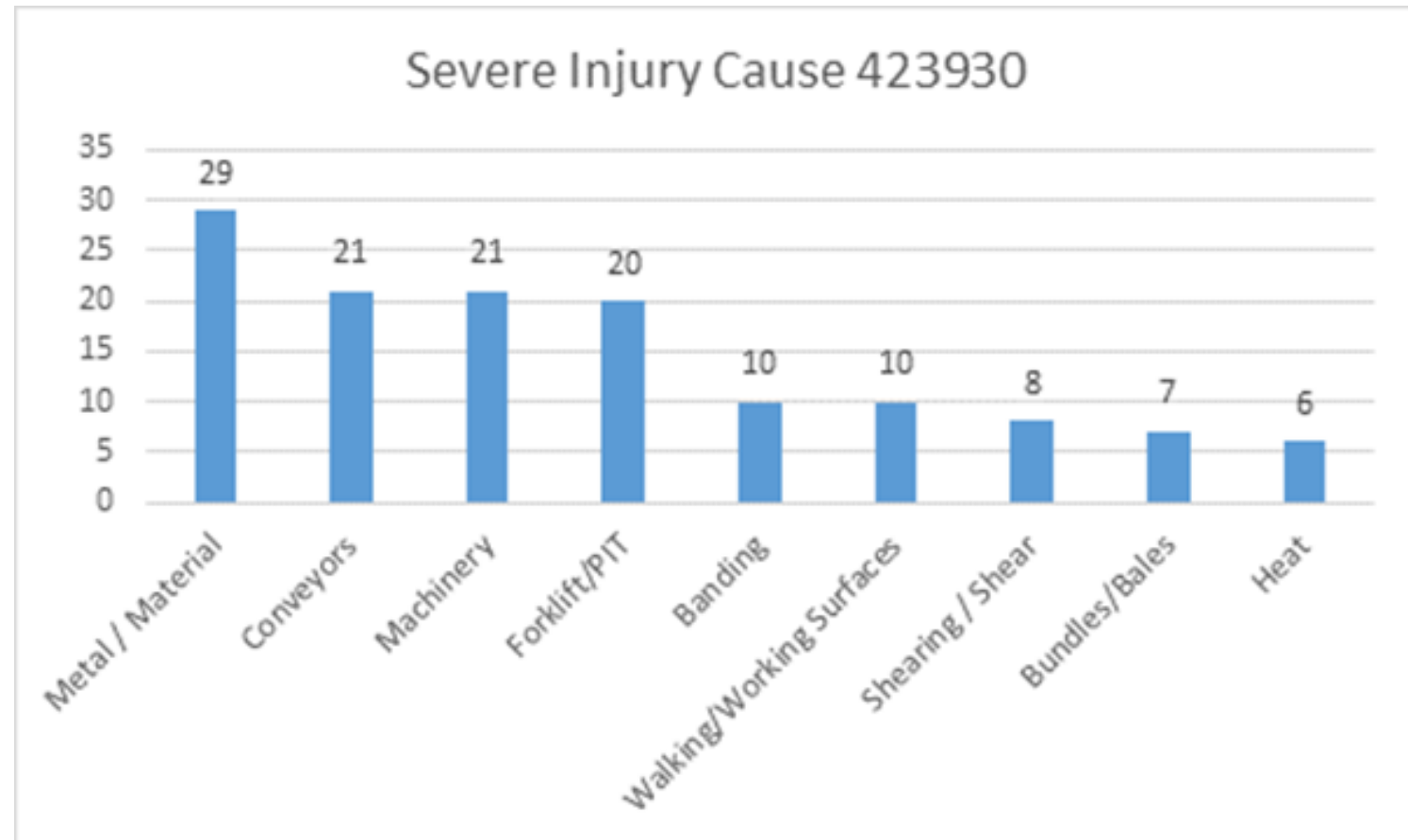


Illness & Injury Data – what, where

NAICS 423930

Recyclable material merchant wholesalers

- Metal / material
- Conveyors
- Machinery
- Forklift / Powered Industrial Vehicle
- Banding material
- Walking working surfaces
- Shearing / shear
- Bundles / bales
- Heat

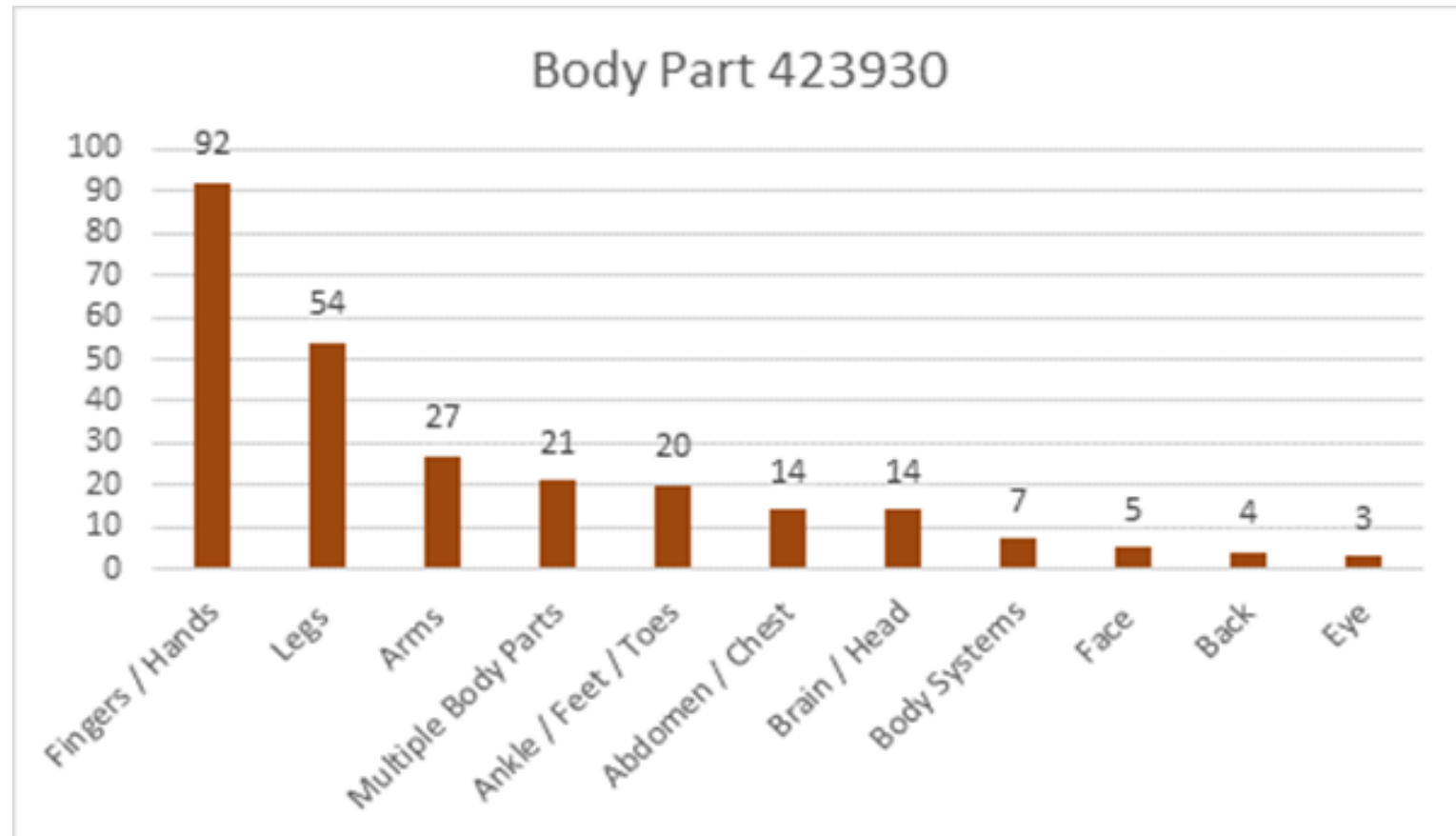


Illness & Injury Data – body part

NAICS 423930

Recyclable material merchant wholesalers

- Fingers / hands
- Legs
- Arms
- Multiple body parts
- Ankle / feet / toes
- Abdomen / chest
- Brain / head
- Body systems
- Face
- Back
- Eye



The Circle of Safety Excellence (COSE) is an initiative offered by ISRI to help improve worker, vehicle and facility safety within the recycling industry. COSE members consist of like-minded companies which voluntarily come forward to share best practices and safety data for the betterment of their own safety operation, and at the same time be recognized by ISRI for their commitment to safety.

Member Benefits:

- FREE no cost to join
- Improve employee safety
- Availability to network and share safety best practices e.g., near misses
- Access to quarterly COSE webinars (exclusive for COSE members only)
- Participate in setting safety benchmarks
- Reduce worker's compensation claims
- Improve your experience modification rate
- Opportunity to participate in the annual COSE Occupational Awards Program

Join HERE:

[https://www.isri.org/safety/circle-of-safety-excellence-\(tm\)](https://www.isri.org/safety/circle-of-safety-excellence-(tm))

ISRI Safety & Environmental Council

- 3 Tuesdays in November
- 2:00 PM to 4:00 PM ET
- \$99 member
- \$299 non member
- **November 9th**
 - Seven Ways to Control Cost of Business Insurance – Bradley & Parker
 - Environmental Impact of Natural Disasters – EPA representatives
- **November 16th**
 - Transportation Safety – Overhead Powerline Hazards – Electrical Safety Foundation International
 - The Impact of Serious Accidents - Ricky Rollins Safety Speeches
- **November 23rd**
 - Importance of Planning for Natural Disasters – Ohio Emergency Mgt Agency
 - Emergency and Disaster Response Experiences and Lessons Learned – 3 member company representatives

Register HERE → <https://www.isri.org/safety/isec/2021-virtual-fall-isec-conference>

Monthly Safety Calendar 2021 - <https://www.isri.org/safety/isri-safety-calendar>

- Env, Health & Safety resources that align with OSHA/EPA emphasis
- DOT safety resources
- Weekly EHS Update emails

Course Materials – Hazard Recognition - <https://www.isri.org/safety/osha-harwood-grant-training-materials>

- Course materials
- Videos (English/Spanish)
- All materials will be available on website for download
- HazRec classes available on-demand in English/Spanish

Outreach & Digital Health & Safety Education - <https://www.isri.org/safety/safety-training>

- General Safety course on ISRI learning mgt system (LMS)
- Virtual Town Hall Meetings to learn & discuss current issues – for ISRI members

Moving Safety Forward in 2022

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