CROSSTELL 19-01

AFSAS OSHA EVENT # 4605 / OSHA Inspection # 1352573

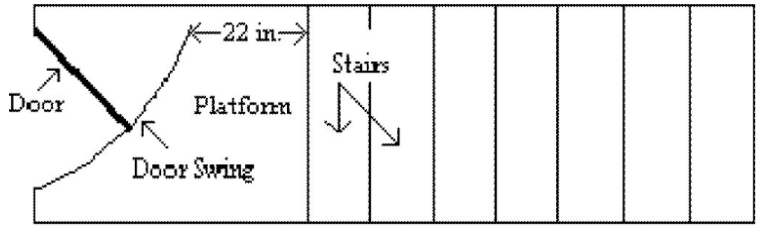
Hill AFB (AFMC) | OSHA Region: 8

10 October 2018

BLUF: OSHA visited Hill AFB to investigate a worker complaint. The OSHA inspector identified several hazards dealing with Means of Egress and Walking/Working Surfaces. Two Notice of Unsafe or Unhealthful Working Conditions were issued. Both were decreased in severity from Serious to Other than Serious during the Informal Conference held on 27 Feb 19.

OTHER THAN SERIOUS (2):

29 CFR 1910.25(b)(5)(i): When a door or grate opens directly on a stairway, a platform was not provided and/or the platform did not provide a useable depth greater or equal to 20 inches in a facility constructed prior to 2017; 22 inches for facilities constructed after 2017. **Identified in three different facilities.**



In this case, it is more feasible to block off the exits with concurrence of installation FES instead of demolition and reconstruction of the stairs in question. This depends on the occupancy and number of exits in the facility.

29 CFR 1910.28(b)(11)(ii): Each flight of stairs having at least 3 treads and at least 4 risers is equipped with stair rails systems and handrails. Stair width 44-88 inches: One stair rail system with handrail on open side and one handrail on enclosed side. **Identified in 17 different facilities.**

Lessons Learned:
- The OSHA inspector noted they have been focusing on 1910.22 - *General requirements*, when visiting installations.

1910.22(a): Surface conditions. The employer must ensure:
1910.22(a)(1): All places of employment, passageways, storerooms, service rooms, and walking-working surfaces are kept in a clean, orderly, and sanitary condition.
1910.22(a)(2): The floor of each workroom is maintained in a clean and, to the extent feasible, in a dry condition. When wet processes are used, drainage must be maintained and, to the extent feasible, dry standing places, such as false floors, platforms, and mats must be provided.
1910.22(a)(3): Walking-working surfaces are maintained free of hazards such as sharp or protruding objects, loose boards, corrosion, leaks, spills, snow, and ice.
1910.22(b): Loads. The employer must ensure that each walking-working surface can support the maximum intended load for that surface.
1910.22(c): Access and egress. The employer must provide, and ensure each employee uses, a safe means of access and egress to and from walking-working surfaces.

1910.22(d): Inspection, maintenance, and repair. The employer must ensure:
1910.22(d)(1): Walking-working surfaces are inspected, regularly and as necessary, and maintained in a safe condition;
1910.22(d)(2): Hazardous conditions on walking/working surfaces are corrected or repaired before an employee uses the walking-working surface again. If the correction or repair cannot be made immediately, the hazard must be guarded to prevent employees from using the walking-working surface until the hazard is corrected or repaired; and
1910.22(d)(3): When any correction or repair involves the structural integrity of the walking-working surface, a qualified person performs or supervises the correction or repair.

- The question was raised about grandfathering or waivers to CFRs and NFPA 101®, *Life Safety Code*®. OSHA does not consider grandfather clauses for CFRs, but uses language to clarify requirements applicability on facilities constructed “prior to 2017” and “after 2017”. Air Force installations fall under Federal requirements, thus must comply with the established guidance in the CFR.

- AFSEC/SEGO will bring this crosstell to the attention of the DoD through USAF safety channels and request a Letter of Interpretation (LOI) from Federal OSHA for older facilities (many of the facilities in question were built in the mid-40s and renovated in the mid-60s). This could have “Corporate-Wide” ramifications due to the same hazards being prevalent throughout the DoD.

Preventing Reoccurrences: Share this information with applicable unit CCs, shop supervisors, USRs and workers for awareness. USRs, Supervisors and Safety personnel should accomplish inspections to ensure these hazards are not present at your respective installations. **Identified hazards require a safety professional to assign a Risk Assessment Code (RAC), document them accordingly, ensure work orders are submitted by the responsible unit to abate the hazard, and track them until properly abated.**