



STATE OF WASHINGTON

DEPARTMENT OF LABOR AND INDUSTRIES
Division of Occupational Safety and Health

312 SE Stonemill Dr. Suite 120, Vancouver, WA 98684-6982

May 31, 2017

Janel Skreen, EHS Manager
LOWER COLUMBIA COLLEGE
1600 Maple Street
P.O. Box 3010
Longview, WA 98632

RE: Consultation Visit #506997731

Consultant on Visit: Christopher Cooke
Company Representatives: Ms. Janel Skreen
Mr. Richard Hamilton
Mr. Brandon Ray
Mr. Jeff Moenck
Mr. Jason Aerosmyth

Dear Ms. Skreen,

I appreciated having this opportunity to help you evaluate the safety and health of your workplace. We at the Division of Occupational Safety and Health (DOSH) are committed to encouraging voluntary compliance with Washington safety laws by offering technical advice and consultation with employers and their employees.

Following is a copy of my consultation report which details my findings and recommendations resulting from a Consultation Visit that provided a safety and /or health hazard assessment of working conditions, equipment, and processes at the work site. The consultation began on 5/25/2017 at 1600 Maple St., Longview, WA 98632.

This was a limited safety consultation, addressing fall protection concerns, requested by the employer.

Evaluation of your company's safety and health program

Your Accident Prevention Plan (APP) is compliant with all Washington State regulations. Use the templates that I provided you with this report to further bolster your safety and health program. You can take elements from the provided templates and cannibalize them to your current program to add additional strength to your current APP.

Make sure that employees are following the employer's rules in regards to safety. Make sure that employees understand that safety is a priority while working at Lower Columbia College.

Other Findings and Recommendations

Your APP is compliant with all Washington regulations and your employees are very knowledgeable when it comes to safety in the workplace. I have included multiple documents with your report, this includes the following documents to help bolster your current APP and items which you had additional questions about. The items are as follows:

1. Respiratory Protection Plan Templates
2. Confined Space Program Templates
3. Construction & General Industry Templates

Additionally I have included some sections of our fall protection codes concerning fall protection for safety monitors, guardrail requirements for skylights, and cover requirements for skylights. The information for protecting the skylights should help with the abatement, and provide your maintenance team with options on how your guys will abate the hazard for your exposed maintenance employees when they are working around the skylights.

I had questioned training for employees in regards to blood borne pathogens (BBP). After reviewing the WAC, you only need to provide training to employees who have occupational exposure to blood or other potentially infectious materials (OPIM). So what you are currently doing as far as training is spot on.

Notice of Obligation

You are required to share this letter and enclosed report with your employees and/or their collective bargaining representatives as soon as possible, but no more than 30 days from receiving it (RCW 49.17.250(3)).

Your consultation report is confidential. Although you must share the report with your employees and/or their collective bargaining representatives, we do not make this document public or share it with DOSH compliance inspectors (except under very limited circumstances, such as when the department is required under subpoena, or if you refuse to correct a serious hazard).

If, in the future, your workplace is inspected by DOSH compliance, you will not be required to tell the inspector about this consultation or share the report. However, if, during the consultation, we perform any tests for workplace exposures (such as noise levels or air quality) DOSH standards require you to show these monitoring results to the inspector, if requested.

If I give you specific guidance that you follow, you would not be cited if a DOSH inspector later finds my guidance did not address (or adequately address) a hazard. You would still have to fix the hazard by the correction date assigned by the inspector. However, it is possible for an inspector to cite you for a hazard not identified during my consultation. This could be because work conditions changed, we had a misunderstanding, or I may have overlooked the hazard. In such cases the inspector would consider any good faith effort by you in determining the penalty.

Your request for this consultation demonstrates that you are committed to the safety and health of your employees. Make sure you routinely conduct self-inspections of your workplace for hazards. The findings shown in this report were hazards identified on the day of the consult and are not necessarily

Consultation Visit # 506997731

all of the hazards that may be present now or in the future at your work site. Situations and conditions can be different from day to day.

If you have any questions about this report, or need further assistance, please contact me. For on-line access to our safety and health rules, go to www.lni.wa.gov/safety.

Sincerely,

Christopher Cooke

Christopher Cooke

Safety Consultant

Phone: (360) 896-2390

Fax: (360) 896-2345

Christopher.Cooke@lni.wa.gov

Attachments:

5/31/2017 12:09 PM



Hazards Identified

In this section, I have listed the hazards identified during my work site visit and my recommendation for correcting the problem. For your convenience, the language of each related Washington Administrative Code (WAC) is included at the end of this report. You must post this document a minimum of 3 days, keeping it posted until all hazards identified are corrected.

- **Serious hazards:** Washington law defines a hazard as serious when there is a substantial probability that death or serious physical harm could result to your employees.
- **General hazards:** A hazard is general when we determine that there is a probability that an employee could be injured or become ill as a result, but there is no reasonable probability that it could cause death or serious physical harm.

If serious hazards have been identified, you will find attached forms entitled "Certification of Hazards Corrected". Complete the form as you make your corrections, and submit it back to me by the correction due date(s).

Serious Hazards Identified

(See Applicable Washington Administrative Code Section for WAC Language)

1. WAC 296-155-24609(1)

Hazard Description:

Maintenance employees performing maintenance work on flat roofs, a walking/working surface, are not following proper safety monitor specifications when employees are exposed to a fall hazard of more than 4 feet.

In the event of an accident; employees working on a flat roofs, with a fall hazard of more than 4 feet, while not using proper fall protection may fall and be seriously injured.

Recommended action:

When using a safety monitor system to perform maintenance work on flat roofs, ensure that safety monitors are following rules specified under WAC 296-155-24615(5) Safety Monitor Specifications.

Per the WAC ensure that your safety monitor adheres to the following specifications:

- (i) The safety monitor system must not be used when adverse weather conditions create additional hazards.
- (ii) Employees working outside of the warning line system, (between the forward edge of the warning line and the unprotected sides or edges of a low pitched surface), must be readily



distinguishable from other members of the crew that are working inside the warning line system by wearing highly visible, distinctive, and uniform apparel.

(iii) Employees must promptly comply with fall hazard warnings from the safety monitor.

(iv) You must train a person acting in the capacity of safety monitor(s) in the function of both the safety monitor and warning line systems, and they must:

(A) Be a competent person as defined in WAC 296-155-24603.

(B) Have control authority over the work as it relates to fall protection.

(C) Be instantly distinguishable over members of the work crew.

(D) Perform no other duties while acting as safety monitor.

(E) Be positioned in relation to the workers under their protection, so as to have a clear, unobstructed view and be able to maintain normal voice communication.

(F) Not supervise more than 8 exposed workers at one time.

(G) Warn the employee when it appears that the employee is unaware of a fall hazard or is acting in an unsafe manner.

You corrected hazard #1 during my visit.

2. WAC 296-155-24609(4)(d)

Hazard Description:

There is no guardrail system or cover for the skylights on the RCA, Main, Admin, and Vocational buildings; exposing employees to a fall height greater than 4 feet when they perform maintenance work.

With no guardrail system or cover for skylights installed, employees are exposed to falls which could lead to serious injury.

Recommended action:

Make sure to install a guardrail system or cover around the skylights on the RCA, Main, Admin, and Vocational buildings where employees are exposed to falls. WAC 296-155-24615 has lists the technical specifications for guardrails and covers and reads as follows concerning these two protection methods:

Guardrail Specifications:

(2) Guardrail specifications.

(a) A standard guardrail system must consist of top rail, intermediate rail, and posts, and must have a vertical height of 39 to 45 inches from upper surface of top rail to floor, platform, runway, or ramp level. When conditions warrant, the height of the top edge may exceed the 45 inch height, provided the guardrail system meets all other criteria of this subsection. The intermediate rail must be halfway between the top rail and the floor, platform, runway, or ramp. The ends of the rails must not overhang the terminal posts except where such overhang does not constitute a projection hazard.

(b) Minimum requirements for standard guardrail systems under various types of construction



are specified in the following items:

(i) For wood railings, the posts must be of at least two-inch by 4-inch stock spaced not to exceed 8 feet; the top rail must be of at least two-inch by 4-inch stock and each length of lumber must be smooth surfaced throughout the length of the railing. The intermediate rail must be of at least one-inch by 6-inch stock. Other configurations may be used for the top rail when the configuration meets the requirements of (b)(vii) of this subsection.

(ii) For pipe railings, posts and top and intermediate railings must be at least 1 1/2 inches nominal OD diameter with posts spaced not more than 8 feet on centers. Other configurations may be used for the top rail when the configuration meets the requirements of (b)(vii) of this subsection.

(iii) For structural steel railings, posts and top and intermediate rails must be of two-inch by two-inch by 3/8 inch angles or other metal shapes of equivalent bending strength, with posts spaced not more than 8 feet on centers. Other configurations may be used for the top rail when the configuration meets the requirements of (b)(vii) of this subsection.

(iv) For wire rope railings, the top and intermediate railings must meet the strength factor and deflection of (b)(v) of this subsection. The top railing must be flagged at not more than 6 foot intervals with high-visibility material. Posts must be spaced not more than 8 feet on centers. The rope must be stretched taut and must be between 39 and 45 inches in height at all points. Other configurations may be used for the top rail when the configuration meets the requirements of (b)(vii) of this subsection.

(v) The anchoring of posts and framing of members for railings of all types must be of such construction that the completed structure must be capable of withstanding a load of at least 200 pounds applied in any direction at any point on the top rail. The top rail must be between 39 and 45 inches in height at all points when this force is applied.

Skylight Covers:

(3) Cover specifications.

(a) Floor opening or floor hole covers must be of any material that meets the following strength requirements:

(i) Conduits, trenches, and manhole covers and their supports, when located in roadways, and vehicular aisles must be designed to carry a truck rear axle load of at least two times the maximum intended load;

(ii) All floor opening and floor hole covers must be capable of supporting the maximum potential load but never less than 200 pounds (with a safety factor of 4).

(A) All covers must be secured when installed so as to prevent accidental displacement by the wind, equipment, or employees.

(B) All covers must be color coded or they must be marked with the word "hole" or "cover" to provide warning of the hazard.

(b) Barriers and screens used to cover wall openings must meet the following requirements:

(i) Barriers must be of such construction and mounting that, when in place at the opening, the barrier is capable of withstanding a load of at least 200 pounds applied in any direction (except upward), with a minimum of deflection at any point on the top rail or corresponding member.

(ii) Screens must be of such construction and mounting that they are capable of withstanding a load of at least 200 pounds applied horizontally at any point on the near side of the screen. They



Washington State Department of
Labor & Industries
Division of Occupational Safety and Health

**Consultation Visit #
506997731**

may be of solid construction of either grill work with openings not more than 8 inches long, or of slat work with openings not more than 4 inches wide with length unrestricted.

You agreed to correct hazard #2 by 6/30/2017.

No General Hazards were found.

Applicable Washington Administrative Codes

1. WAC 296-155-24609(1)

(1) You must ensure that the appropriate fall protection system is provided, installed, and implemented according to the requirements in this part when employees are exposed to fall hazards of 4 feet or more to the ground or lower level when on a walking/working surface.

2. WAC 296-155-24609(4)(d)

WAC 296-155-24609 Fall protection required at four feet or more.

(4) Guarding of floor openings.

(d) Wherever there is a danger of falling through an unprotected skylight opening, or the skylight has been installed and is not capable of sustaining the weight of a two hundred pound person with a safety factor of four, standard guardrails shall be provided on all exposed sides in accordance with WAC 296-155-24615(2) or the skylight shall be covered in accordance with WAC 296-155-24615(3). Personal fall arrest equipment may be used as an equivalent means of fall protection when worn by all employees exposed to the fall hazard.