

IEWS & INFORMATION ON ENVIRONMENTAL WORKPLACE SAFETY



Management of Change Policy

The Agency has developed over 50 Environmental Health & Safety (EHS) policies; many of which are under review to ensure current regulatory compliance and operational needs. Along with this, new policies are considered and instituted as new worker safety and environmental protection needs are realized or discovered.

One new policy is the **Management of Change (MOC)** which has been adopted as of June 2010. Many of the agency’s existing policy address very specific EHS issues or mandates, which follow OSHA standards. However, to build on an already strong EHS culture within DEP, the EHS Policy Working Groups are exploring and developing agency-specific policies that will address more operational-specific needs. Many of these will be written as a performance standard, rather than a “how to” guide. This basically means that the goals and expectations are spelled out, but the SOP also affords the operation to meet the goals in the way that best fits the operation. The MOC is one such example of this.

The main purpose of the MOC is to prevent accidents caused by uncontrolled changes in processes, equipment, or non-routine tasks. This applies to all DEP Operations and contracts, but does not replace Process Safety Management, Risk Management Program or existing bureau procedures.

How will this be carried out within our agency? Assessing the risks associated with new or modified equipment, structures, tasks and processes involves communication, coordination, and follow through. Some of the things to consider are:

- ◆ The need for employees and managers to identify existing or planned activities, equipment or processes that are to be changed or are new. In addition, it is important to assess tasks that are unusual and non-routine. The end goal is to support innovation and improvements while preventing uncontrolled changes which may create hazards to people, environment and operations.
- ◆ The importance of evaluating changes to ensure that risks have been evaluated and communicated prior to work/use.
- ◆ Obtaining EHS assistance when making an operational change.
- ◆ Ensuring that any field changes or temporary installations done during contracted work are managed by the resident engineer.
- ◆ Use equivalent alternatives that reduce EHS impacts and risks.

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Personnel should also know that changes do not include those made in accordance with:

- ◆ Manufacturer's instructions/specifications;
- ◆ Specific codes and standards;
- ◆ Normal repairs and replacements, that are within the skills and knowledge of the person assigned the task;
- ◆ Documented changes made under the supervision of an engineer.

Examples of changes that need to be assessed under this policy include:

- ◆ Using or modifying a tool in a way not indicated by the manufacturer;
- ◆ Changing a chemical used in a treatment or sampling process;
- ◆ Changing a piece of equipment for a routine task;
- ◆ Any non-routine work task.

The Office of Environmental Health & Safety Compliance (OEHS) will monitor policy effectiveness, coordinate policy review and revised policy, and provide technical support.

In addition, all bureau programs must be reviewed every two years and updated as needed. During Programmatic Audits, facilities will be expected to demonstrate compliance with the MOC policy.

The MOC Policy requires that information and training be provided as needed to employees affected by new or changed equipment, process, or tasks. The policy and training module are available in the OEHS "e-library" on Sharepoint and on *Pipeline* (Health & Safety, health, Management of Change).

The Importance of Confined Space Entry Training

Work spaces are considered "confined" when they hinder the activities of employees who enter, work in, and exit them. A confined space has a limited or restricted means for entry or exit and is not designed for continuous employee occupancy. Confined spaces include, but are not limited to, underground vaults, tanks, storage bins, manholes, pits, silos, process vessels, and pipelines. In a word, confined spaces are dangerous places which may contain atmospheric hazards (oxygen deficiency, toxic or explosive gases).

DEP's *Confined Space Entry Program* was established to protect employees from the hazards of entering and working in confined spaces. Training in that program can be essential to survival. A recent, tragic example underscores the importance of training in Confined Space procedures. (Continued pg.4)

The Importance of Guardrails to Workplace Safety

Guardrails protect against potential fall hazards created by open in-ground or in-floor doors or hatches. Such doors or hatches are common at locations such as pump stations, well stations, shafts and metering pits and may be located in unguarded residential and public areas (e.g. sidewalks, roads, parking lots, etc.). The openings are generally covered by lockable flush-mounted stainless steel covers of adequate closed strength with shocks (to aid in opening the doors) and a locking mechanism to hold the door in the open position.

Regulatory Requirements

Based upon the classification of the in-ground or in-floor, the following OSHA regulation requires either a standard railing or someone constantly attending the opening while the door is open: *OSHA §1910.23 (a)(5): Every pit and trapdoor floor opening, infrequently used, shall be guarded by a floor opening cover of standard strength and construction. While the cover is not in place, the pit or trap opening shall be constantly attended by someone or shall be protected on all exposed sides by removable standard railings.*

The regulatory requirement cited above can be satisfied by using one of the following methods:

1. Requiring an attendant to constantly monitor any open in-ground or in-floor door without standard railings, communicating this requirement effectively to all staff and supervision responsible for entering such doors, and verifying implementation;
2. Using a mobile temporary railing system that meets the requirements for standard guardrails with appropriate warning signs to prevent people in the area from falling into the opening;
3. Using light-weight drop-in gratings that protect the openings; or
4. Constructing or modifying the door opening so that it has “pop-up” railings that meet regulatory requirements.

Equipment Options

Portable Railings

A variety of portable railings meeting the requirements for standard OSHA (29 CFR 1910.23) railings are available. The drawback to the portable railings is that the bases are heavy to handle; however, devices are available to help move the bases.

Light-weight Grating

Many manufacturers such as Bilco offer a light-weight grating that fits into the angle supports of the door opening. Bilco's fall protection grating is constructed of corrosion resistant fiberglass and includes lift assistance and an automatic hold open arm for ease of operation and user safety. Bilco offers its fall protection grating in standard and special sizes and kits can be supplied to retrofit the product onto Bilco doors in the field.

Pop-up railings

For new installations or replacements of in-ground door openings, manufacturers offer doors with integral pop-up railings.

Pesticide Use at DEP

The Department of Health & Mental Hygiene (DOHMH) has been informing City employees about the increase in numbers of mosquitoes carrying the West Nile Virus this year. As a result, preventative measures such as pesticide application in targeted locations have been ongoing this season by DOHMH. DEP uses pesticides at facilities as needed, but these chemicals may be applied only by a certified pesticide applicator. DEP employees who work in this role must be trained in safe distribution, handling, and storage procedures. Complying with pesticide application requirements is complex and varies with the type of pesticides used and in the manner in which they are applied. To inform employees of these complexities, DEP has published a *Pesticide Management Policy* that addresses the following:

- ◆ General Use Requirements;
- ◆ Cleansing and Disposal of Pesticide Containers;
- ◆ Reuse of Pesticide Containers;
- ◆ Disposal of Unused or Unwanted Pesticides;
- ◆ Annual Agency Registration and Reporting;
- ◆ Applicator Certification and Training; and
- ◆ Record Keeping.

In addition, there are limited exceptions to the requirement for applying pesticides under the direction of a *Certified Commercial Pesticide Applicator*. However, DEP employees may:

- ◆ Apply insect repellent on their person to provide protection against insect bites when appropriate.
- ◆ Carry a can of pesticide when performing outdoor work, but only for emergency use.

To familiarize yourself with the details of the agency's policy, read the Pesticide Management Policy on *Pipeline*, DEP's intranet (Health & Safety/environmental/ Pesticide Management).

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On September 6, 2010, two men died after succumbing to fumes and falling down an approximately 15-foot man hole near the Consolidated Engine Company quarters in Tarrytown New York. A local worker investigating a sewage backup descended into the manhole and fell in as a result of hazardous fumes built up in the confined space. A Tarrytown firefighter in the line of duty descended in a rescue attempt, but he too was overcome by fumes and fell into the manhole. Both men were later removed from the confined space using a tripod and winch, but it was too late to revive them.

At DEP, everyone is responsible for safety. If you or anyone on your team is concerned about your working conditions, it's okay to ask your supervisor or your bureau's EH&S liaison how they can help. If you've still got questions, you can call the EH&S Employee Concerns Hotline. It's DEP's responsibility to acknowledge and fix unsafe situations, procedures, and practices. With your help, we'll not only get the job done, we'll make it safer for ourselves, our coworkers, our families, and our city.

CALL (800) 897-9677 OR SEND A MESSAGE THROUGH PIPELINE. HELP IS ON THE WAY.