

## Required Recordkeeping - 300 what?

The Occupational Safety and Health (OSH) Act of 1970 requires certain employers to prepare and maintain records of work related injuries and illnesses. In fulfillment of this requirement, OSHA developed a series of specific record keeping forms: OSHA's Form 300, 300A, and 301. The OSHA 300 series forms are written in plain language and are intended to simplify work-related injury and illness record keeping and enhance company safety and health programs. The resulting data collected by these forms will be used to track and compile statistics on work-related injuries, illnesses, and deaths so that employers and Cal/OSHA can develop a picture of the extent and severity of work-related incidents. They also help Cal/OSHA identify the scope of employer-assistance needs.

## Log of Work-Related Injuries and Illnesses

During each year, OSHA's Form 300, the "Log of Work-Related Injuries and Illnesses", must be used to classify work-related injuries and illnesses and to note the extent and severity of each case. When an incident occurs, employers must use the log to record specific details about what happened. On this form, employers must record information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid. They must also report significant work-related injuries and illnesses diagnosed by a physician or licensed health-care professional. Employers must also record work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

## Injury and Illness Incident Report

OSHA's Form 301, the "Injury and Illness Incident Report", is one of the first forms employers must fill out when a recordable work-related injury or illness occurs. This form, or its equivalent, must be completed within 7 calendar days after receiving information that a recordable work-related injury or illness has occurred. The form must be kept on file for 5 years following the year to which it pertains.

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. (See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.)

## Summary of Work-Related Injuries and Illnesses

At the end of the year, all establishments covered in 29 CFR Part 1904 must complete OSHA's Form 300A, the "Summary of Work-Related Injuries and Illnesses", even if no work-related injuries or illnesses occurred during the year. After careful review of the "Log of Work-Related Injuries and Illnesses" to verify that entries are complete and accurate, the total number of incidents in each category listed on OSHA's Form 300 must be transferred to the Form 300A. California law requires employers to post the "Summary" page from February 1 to April 30 of the year following the year covered by the "Summary". It must be displayed in a conspicuous location where notices to employees are customarily posted. A copy of the "Summary" must also be made available to employees who move from worksite to worksite and employees who do not report to any fixed establishment on a regular basis. At the end of the three-month period, the "Summary" should be taken down and kept on file for a period of five years following the year to which it pertains.

## Remember

You are not alone. If you need guidance or have questions about this or any other Health and Safety matter, the Stratus EH&S team is here to assist you. Give us a call at (714) 622-3920, or e-mail at [aweir@stratusinc.net](mailto:aweir@stratusinc.net).

**Also, Don't forget to get your Form 300A posted by February 1<sup>st</sup> of this year!**

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## LATEST NEWS

Stratus will be conducting a safety meeting and training covering Respiratory Protection on Friday, February 18<sup>th</sup>, at 10:30 am. We invite all who are interested to attend, just contact me at [aweir@stratusinc.net](mailto:aweir@stratusinc.net)

Stratus will be traveling to the BP HSSE Contractor Performance meeting in Houston Texas next month to join other BP providers in a global discussion on HSSE continuous improvement.

## Kudos Corner!

Kudos to Erik Griffon. Erik's job site was chosen as a random site safety audit. Erik passed his audit without fault, all paperwork was in place and completed properly, and more importantly, Erik was observed following safe work practices. Way to look out for yourself, your family, and Stratus Erik! Thank you and well done!!

## Lessons Learned

On November 19, 2010, during mixing of activated sodium persulfate (ASP) solution for pilot testing of in-situ chemical oxidation (ISCO) injection, approximately 2-3 gallons of ASP was released from the equipment.

The release occurred while mixing the ASP solution by means of circulating the contents of two 500-gallon trailer mounted tanks placed next to each other on a closed-circuit/low pressure mixing and injection trailer equipped with built-in secondary containment. The ASP solution consisted of 20 percent (by weight) powder sodium persulfate mixed with water and activated by liquid sodium hydroxide. The breach in the system occurred while the two tanks were circulating under high flow/low pressure. The connection between the transfer hose and the elbow fitting connecting to the top of Tank #2 came loose and the solution was released. The emergency shutoff switch was quickly triggered by the authorized personnel overseeing the operations and the discharge was stopped. The operators in close proximity of the mixing tanks were wearing the required personal protective equipment (PPE) yet were not exposed to the solution. The majority of the solution lost (approximately 6-8 gallons) drained into the built-in secondary containment pan of the trailer. A portion of the solution (approximately 2-3 gallons) was released beyond the boundary of the secondary containment and onto the surface of the site. The released ASP solution was immediately contained and isolated using litter, then slightly diluted with water, and collected with a 3-gallon portable shop-vac. None of the site workers were exposed or injured during this event.

**The lesson learned** here surrounds equipment inspections prior to operation. The hose disconnected from the fitting most likely due to the hose clamp not being fully tightened. The system was low pressure (but high volume). Simply because the system was low pressure doesn't necessarily mean that the fittings "do not need to be fully tightened". The mass of the solution and the force imposed by the movement of high volumes (mass) adds stress to fittings and will additively increase the stress on joints and fittings; therefore, everything should be tightened to the appropriate manufactures specifications. Remember, the failure of a system occurs at the weakest link of a chain.

\***Safety Tip**- Learn what to do during an earthquake, whether you're at home, at work, at school or just out and about. Taking the proper actions, such as "Drop, Cover, and Hold On", can save lives and reduce your risk of death or injury. During earthquakes, drop to the floor; take cover under a sturdy desk or table, and hold on to it firmly. Be prepared to move with it until the shaking stops.