Worker Safety Guidance

Your guide to worker safety requirements at transfer stations on Tribal lands.

Safety Regulations for Tribal Transfer Stations

Safety of both workers and customers should be the top priority for any transfer station or solid waste operation. A safe working environment at a transfer station is essential for employee performance and productivity, as solid waste activities are consistently in the top 10 list of the most dangerous jobs. Injuries and even fatalities can happen with solid waste management operations, but these can be reduced by implementing worker safety requirements and best practices.

Certain areas require personal protective equipment

Tribal operations are subject to Occupational Safety and Health Administration (OSHA) safety regulations. Located within the US Department of Labor, OSHA – as well as state agencies – can provide models and guidance on implementation of various safety topics. OSHA regulations require facilities to provide safe working conditions for all employees. Although OSHA has not released regulations specific to solid waste transfer stations, general OSHA regulations apply as they would to any other constructed facility.

A common resource to address site specific requirements is creation of a written safety plan with safety practices, a training schedule, site inspections, and accident investigations.

Safety Meetings and Trainings

Weekly, bi-weekly, or, at a minimum, monthly safety meetings and trainings are standard safety practices for solid waste transfer stations. Holding regular safety meetings helps ensure that all employees understand safe procedures for operation, existing or potential hazards, hazard prevention and control, personal protective equipment (PPE), and health and safety.

Safety meetings and trainings can be handled in a variety of ways. Informal "tailgate" safety meetings are a common industry practice and provide an opportunity to convey safety information on a frequent basis to employees. These are usually conducted in 10 or 15 minutes. Safety meetings can also be more formal, sit-down training sessions, and safety information can also be distributed in written or electronic means for employees to review at a convenient time.

It is useful to combine these methods throughout a safety program to ensure comprehensive training and dissemination of information among staff. Document your safety meetings when they occur, and attendance should be noted to ensure there are records of safety training and understanding among employees.

Personal Protective Equipment

PPE is an essential safety program element. Protection categories include respiratory, head, face, eyes, gloves, clothing, feet, and hearing. The National Waste and Recycling Association lists items of PPE for workers in transfer stations as needed or recommended:

- ✓ High-visibility clothes
- ✓ Hard hats
- ✓ Sturdy shoes with protected toes and insoles
- ✓ Safety glasses
- ✓ Hearing protection, if needed
- ✓ Gloves suitable for the task being performed

To encourage and remind employees to use their PPE, place PPE storage or lockers in prominent locations that are in visible or trafficked locations. Employees also need to be trained in proper use, limitations, and care of the PPE. OSHA PPE standards are referenced in 29 CFR 1910.132.

PPE to consider for transfer station workers

Heat Illness

Hazardous heat exposure can occur both indoors and outdoors and is dependent on many factors, such as heavy physical activity, hot environmental conditions, lack of heat tolerance, and clothing that traps body heat. It is important to consider all potential contributors when determining if a heat hazard could be present for transfer station workers.

Workers who have not recently spent time in warm or hot environments and/or being physically active will need time to build tolerance and acclimate to the heat. Encourage workers to drink adequate fluids and take frequent breaks on hot days. Increased air flow in working areas and air-conditioned spaces to cool off can provide safer working conditions for transfer station employees.

Although regulations have not yet been adopted for heat illness, OSHA has posted guidance on heat illness prevention that can be found on their website.

Lifting and Ergonomics

Transfer stations require tasks such as lifting, lowering, and carrying materials, which can create ergonomic risks if not handled with the right training and equipment. Improper body position, repetitive motion, and repeated or continuous exertion of force can contribute to injuries. Common techniques to implement include proper lifting and using tools and equipment to help lift or move heavy materials.

A guide on safer ways to lift, lower, and carry heavy materials, and general workplace ergonomics is available from the California Occupational Safety and Health Administration.

Vehicle Safety

Vehicles cause the most safety related issues at transfer stations, and these hazards can be caused by both customer and facility vehicles. Worker training on pre- and post-trip vehicle inspections are common tools to enhance vehicle safety, as is implementing preventative maintenance and constant review to ensure safe operation.

All employees should understand the traffic flows of a transfer station, and extra precautions should always be taken in areas where frequent back-ups occur, such as flashing lights, backup alarms, and extra checks of the area behind the vehicle. Keep vehicle owner manuals in the vehicle glove box or at the transfer station so these materials are available for reference when needed.

Planning safe traffic flow throughout the facility can reduce vehicle safety hazards. In areas where customer vehicles enter, drive, and exit, provide proper and safe access for customers by clearly indicating drop-off areas. Establishing customer unloading areas separate from operational areas for large collection equipment vehicles is a common safety measure – you can do so by setting up cones or painting lanes for separation. If tribal elders arrive at the transfer station, solid waste technicians might be directed to remove waste from the vehicle rather than asking elders to unload and dump their own trash.

Clear area for traffic, with safety barricades

For peak periods such as special collection events or the first weekend after a holiday, staff should use traffic cones or set up a separate waiting lane so that cars can line up along the side of the road leading to the transfer station entrance and not block traffic.

Inhalation Hazards

Unloading areas can often have localized air quality problems, such as dust and odor. If there are dry or dusty loads (such as construction and demolition wastes), dust in particular, can pose a safety or health hazard, especially if prevailing winds blow materials. Wildfires have become an increasing inhalation hazard for particulates sometimes to the point that personal protection is mandatory, or even temporary facility closure is the safest measure.

The key PPE protection to prevent inhalation hazards is respiratory aids, such N95 masks or respirators that are properly fitted. Water-based dust suppression systems can temporarily reduce airborne dust, and office areas might be made safe for limited temporary shelter from dust by adding fans or ventilation.

Site Safety Inspections

Conducting daily, weekly, and monthly site safety inspections is a recommended practice to review site emergency equipment readiness, equipment and facility maintenance needs, and to review the site for operational hazards. Written inspections help document safety conditions and ensure resolution.

Sample Worker Safety Guidances

Many state and local agencies have worker safety guidances and regulations that could be useful to transfer stations and solid waste operations regardless of the state the operation is located in. Several of these state guidance resources include:

- ✓ Minnesota's AWAIR (A Workplace Accident and Injury Reduction) program aims to reduce incidence of workplace accidents and injuries.

  A model inspection and incident plan is available specific to household hazardous waste.
- ✓ Michigan's OSHA offers guidance on assessing workplaces for heat-related incidents and illnesses.
- ✓ Oregon OSHA publishes useful guides, including "HAZWOPER: A Planning Guide" to explain when the HAZWOPER standard applies.
- ✓ New York State's Local Technical Assistance Program Center has information on "tailgate talks," which are informal safety meetings you can have with your employees to enhance their understanding of safety hazards and preventative measures.

Industry associations also offer great safety awareness training opportunities and outreach models:

- ✓ The National Waste & Recycling Association (NWRA) offers Safety Mondays and annual Safety Stand Downs to give companies ideas for reducing risks to employees.
- ✓ The Solid Waste Association of North America (SWANA) provide safety training for solid waste personnel and has local chapters throughout the United States.

Solid waste industry publication subscriptions provide articles on safety issues relevant to transfer stations. Three well known resources include:

- ✓ Waste Advantage
- ✓ MSW Management
- ✓ Waste Today

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Reporting safety issues and incidents

An incident report is a tool that captures workplace injuries, health and safety issues, accidents, and near misses to record an incident. Generally, an incident is defined as any event or situation that causes significant risk, disruption, or interference, impacts operation, or attracts negative media attention.

As a written account of a situation, an incident report records the events that led up to an accident as well as the immediate aftermath, determines its possible cause, and documents any actions taken. An incident report should be completed shortly after an incident occurs, no matter how minor an injury or situation may seem.

What information is included on an incident report form?

The exact format of an incident report can vary; however, incident reports should contain:

- ✓ General information, such as:
  - The names of affected people, their position and department
  - The location, time, and date of the incident
- ✓ Description of the incident, such as:
  - The type of accident, injury, and any first aid or medical treatment administered
  - Any damage to property or equipment
  - An account of what happened and how it happened
  - Photos and diagrams of the incident, as helpful
- ✓ Statements from the employees involved and any witnesses, if applicable.
- ✓ A general analysis of the incident's setting or environment, such as:
  - What physical and environmental conditions caused the incident?
  - What were the contributing factors (e.g., people, structural, environmental, mechanical)?
  - What potential hazards were found in the area of the incident?
- ✓ Preventative, corrective, or remedial actions planned to prevent recurrence
- ✓ Name of the incident report writer

Sample Incident Report Form

1. General Information			
Employee name	☐ Male ☐ Female	Date of birth	Job title
Facility	Department		Date and time of accident
Exact location of accident	Job being performed		Date injury reported

2. Description of Injury or Illness	
Type of accident_____ Type of injury_____ Part of body_____	Treatment ☐ First aid ☐ Medical Physician_____ Clinic_____ Hospital_____
Damage to property or equipment:	

3. Description of Incident	*What happened and how did it happen?*
Statement of employee or subcontractor involved	
Statement of witness(es)	

4. Analysis	*What caused the incident? Why did it happen?*
Primary cause	
Contributing factors	

5. Immediate causes	*What unsafe acts or conditions caused the event?*

6. Underlying and root causes	*What people, organizational, environmental, technical, or job factors caused the event?*

7. Preventative corrective action	*How will the incident be avoided in the future?*
Immediate action	
Who is responsible?	Anticipated completion date
Long-term action	
Who is responsible?	Anticipated completion date

8. Remedial Actions	*How is the incident being remediated?*

9. Signature of investigator	
	Date

10. Follow up action / review of recommendations and progress

11. Name of reviewer	

12. Position/title of reviewer	