

NLC NATIONAL LEAGUE OF CITIES

RISC RISK INFORMATION SHARING CONSORTIUM

IMPLEMENTING AN OSHA TRAINING PROGRAM FOR TRANSFER STATION SUPERVISORS & ATTENDANTS

Lynn Rose

October 28 | 10:30 - 11:30 a.m.

MIIA Risk Management

Work Safe. Be Safe.

OSHA Program for Transfer Stations

NLC Conference 2026

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MIIA

Presentation Overview

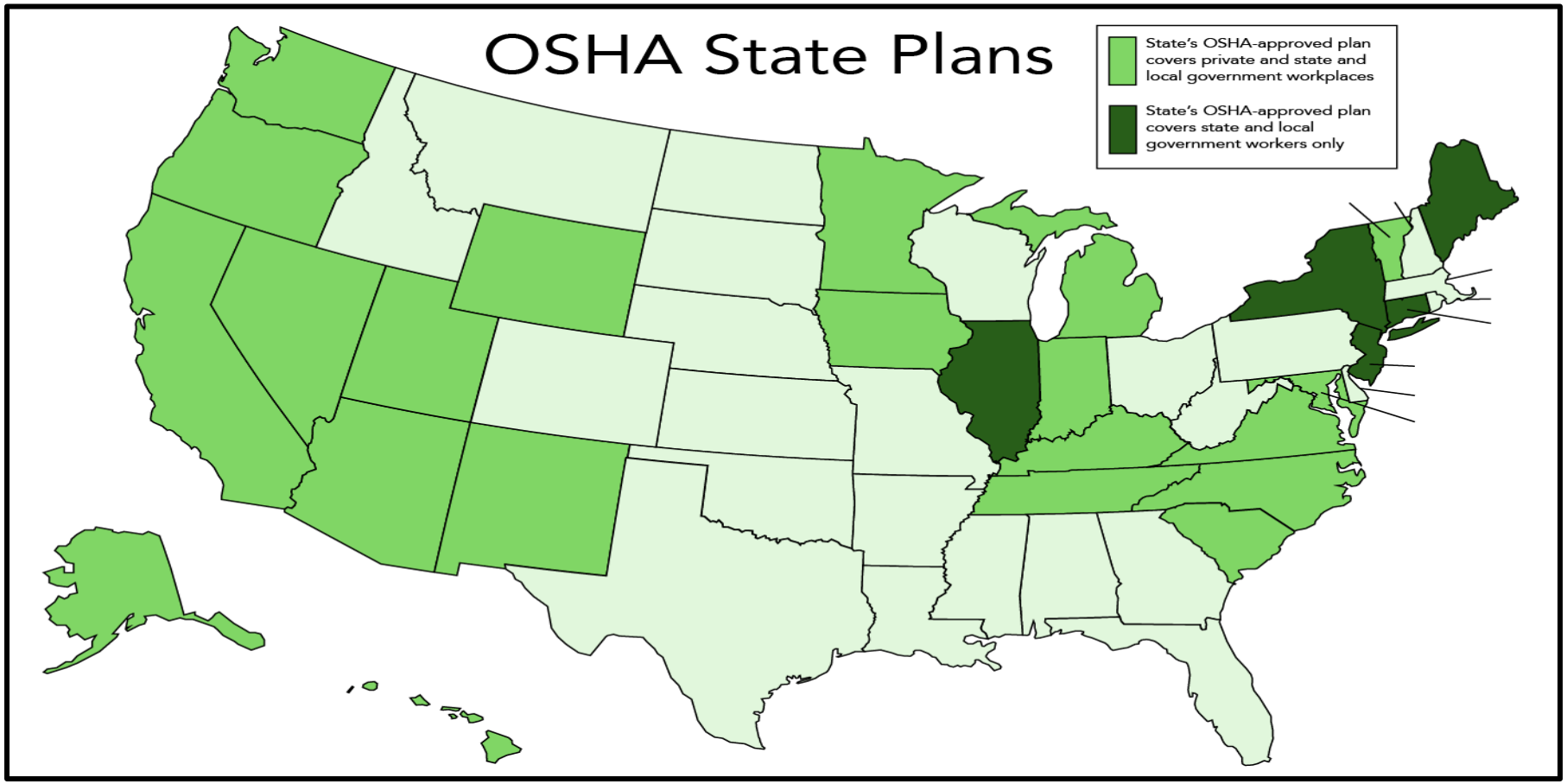
Presentation will answer the following:

1. What occupational hazards and property are found at Transfer Stations (TS)?
2. What OSHA requirements apply to these hazards?
3. What systems do municipalities have to put into place to protect employees, the public, and property?
4. How is the program designed for effective implementation?

Program Based on an OSHA-Approved State Plan for Massachusetts Public Sector (only)

The State Plan was initially approved on August 18, 2022.

It is enforced by the Department of Labor Standards (DLS).



Summary of Work:

Identified Key Hazards from over 20 TS Inspections

and

Discussions with Town Administrators and TS Attendants

Chemical Hazards

Chemical hazards fall into following categories:

1. Hazardous Products used on site by attendants



2. Hazardous and Universal Waste collected



3. Unauthorized products *left* or *donated* by residents

4. Products used by contractors (e.g., pesticides).



Types of Haz Mat Releases & Fires



Li-Ion Battery Fires



PCB Spills



Used Oil Spills



Battery Acid Spills



Hydraulic Oil Spills



Mercury Spills

Fire Hazards

Fires!

A fire in an incoming load



A vehicle fire



A fire in compactor



Compost & brush fires





Fires in containers

Emergency Response – First Aid

Emergency Eyewash – Hard Issue to Resolve!







Due to lack of heat in buildings when TS is not open:

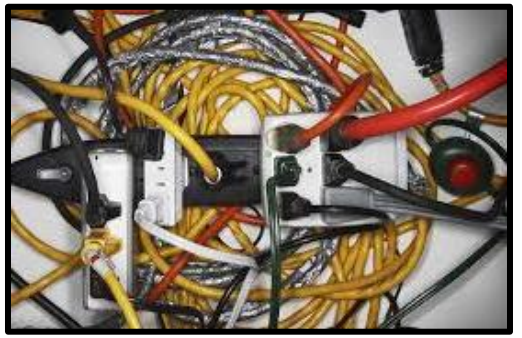
- Cannot keep eyewash solutions from freezing.

All eyewash systems need to:

- Be located near hazard, be unobstructed, have signage.
- Provide adequate water volume, pressure, temperature.
- Be inspected and maintained.

Most common findings of electrical hazards:

Lack of adequate power and receptacles lead to permanent use of extension cords & power strips.





Lack of clearance for circuit panels.

Portable heaters lack tip over protection.

Appliances not directly wired.



Pests – TS is an Attractive Nuisance!

Can damage buildings, start fires, generate allergens, cause fatal allergic reactions and disease, etc.
















Pest Control Issue for Municipal Employees









Use of insecticides and rodenticides by MA municipal employees on town property requires a pesticide license by the MA Dept of Agricultural Resources.

MDAR
MASSACHUSETTS DEPARTMENT OF AGRICULTURAL RESOURCES

Walking/Working Surfaces: Unprotected Edges into Compactor

- Fall Hazard
- Machine Guarding Hazard
- Hazardous Energy Hazard



https://www.wcvb.com/article/southborough-massachusetts-vehicle-stuck-trash-compactor/45589193

Walking/Working Surfaces: Stair Hazards – Key Finding!

- Icy stairs
- Damaged stairs
- Inconsistent stair heights and depths
- Lack of stair railings or railings not compliant with OSHA specs







Walking/Working Surfaces: Slips, Trips, Falls – Hazards

Housekeeping







Walking/Working Surfaces: Ladder Hazards

- Not rated for workload
- Used incorrectly
- Damaged
- Dirty



Inspections found attendants salvaging ladders from the trash or reuse sheds.

This practice needs to be prohibited!

Compactor Hazards

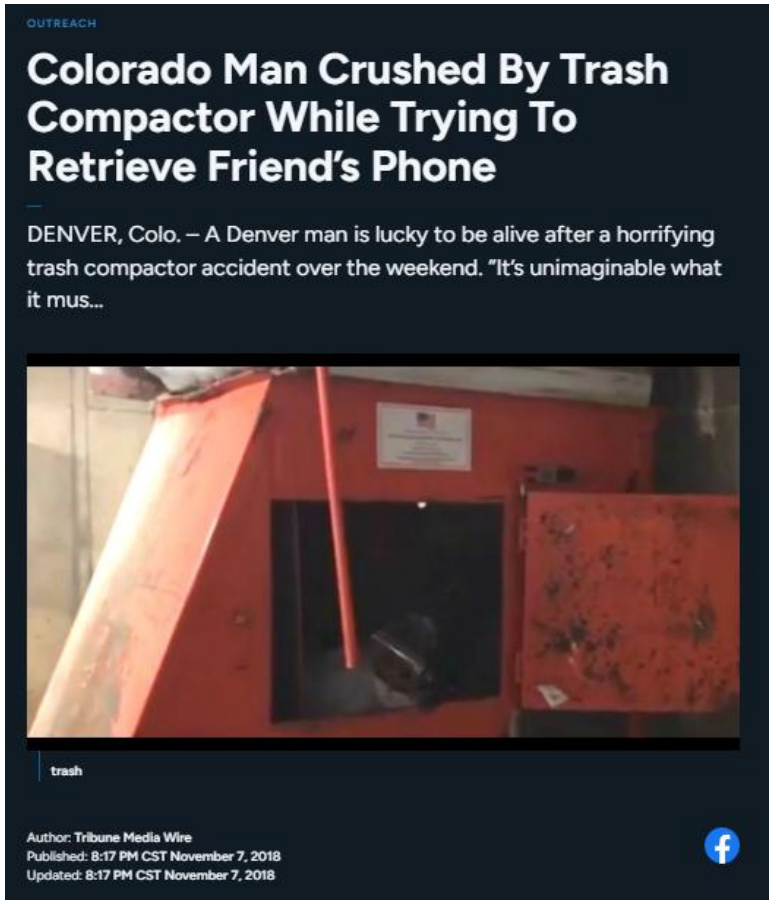
A wide range of severe hazards exist due to size, configuration, and operation:

Use – Troubleshooting:

- Clearing jams
- Retrieving items from compactor (e.g., keys, phones, wallets)

Maintenance:

- Cleaning, repairing, or maintaining compactor


OUTREACH

Colorado Man Crushed By Trash Compactor While Trying To Retrieve Friend's Phone

DENVER, Colo. – A Denver man is lucky to be alive after a horrifying trash compactor accident over the weekend. "It's unimaginable what it mus...

trash

Author: Tribune Media Wire
Published: 8:17 PM CST November 7, 2018
Updated: 8:17 PM CST November 7, 2018

Compactor Hazards

Most common hazards:



Caught-In/Between



Struck-By

Source: weeklysafety.com, volume 2, issue 46, Heavy equipment, Trash Compactors

Applicable OSHA Requirements

Four OSHA standards apply:

Machine Guarding





Confined Space (PRCS)

Lock Out/Tag Out





Fall Protection

Requirements for Coordinating with Vendors Servicing Compactors

For contracted work, MA Dept of Labor Standards requires communication and coordination between TS and vendors for:

- Permit Required Confined Space (PRCS)
- Lock Out/Tag Out

Involves coordinating:

- Work scheduling and informing employees
- Agreement on OSHA Plans, work practices, schedules

Applicable OSHA Requirements

- Emergency Action Plan – Natural Disasters, Extreme Weather, Power Outages, Haz Mat Releases, Shelter in Place, Lock Down, etc.











- Fire Prevention and Response Plan



- Hazard Communication Plan



Why an EAP is so Important!

Key Points Regarding Emergencies at TS:

- TS are collecting a wide range of haz mat in all kinds of conditions, including unknown materials.
- It is hard to monitor and manage materials brought in during operating hours:
  - Unauthorized materials are disposed of out of sight.
  - Incompatible items are disposed of together.
  - Items are disposed in inappropriate places.
- Reactions can happen when TS are closed.



Why an EAP is so Important!

Key Points Regarding Emergencies at TS, Continued:

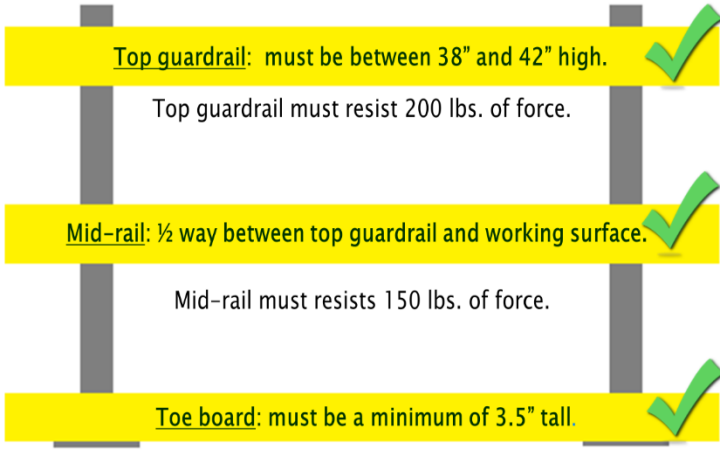
- Rural TS are located in locations that:
  - have no cell service and no land lines
  - have no emergency medical services within 30 minutes
  - have volunteer fire depts and limited water for fire suppression
  - are located in flash flood zones
  - are located in areas that get cut off in major weather events
  - have facilities that cannot be used to SIP or lock down.

Applicable OSHA Requirements

- **Walking/Working Surfaces:**

1. Slips/Trips/Falls

2. Fall Protection



All of the guardrails must be a minimum 1/4" in diameter.

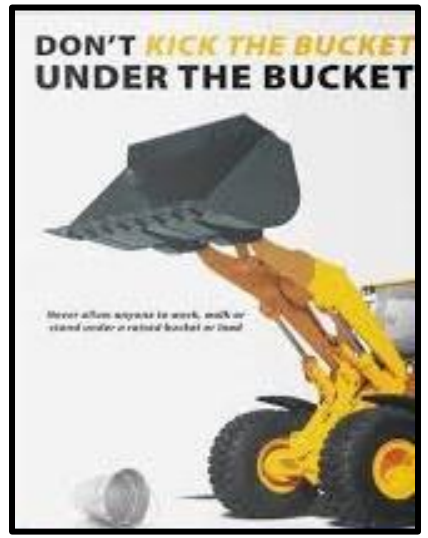
3. Ladder Safety



Applicable OSHA Requirements



- Power Tools
- Equipment



- Electrical Safety





- Materials Handling

Applicable OSHA Requirements





- Bloodborne Pathogen Standard
  - Blood Spills
  - Used Syringes

- Personal Protective Equipment



Applicable OSHA Requirements

Pests: General Environmental Controls – Sanitation



Although the TS is inherently an attractive nuisance:

There are Integrated Pest Management (IPM) strategies to minimize risk from pest disease, injuries, and building damage.

The program provides guidance on development of an IPM Plan.



OSHA General-Duty Clause

Based on outcomes of a Job Hazard Analysis, there may be hazards not accounted for under OSHA standards.

OSHA requires employers to address them under:



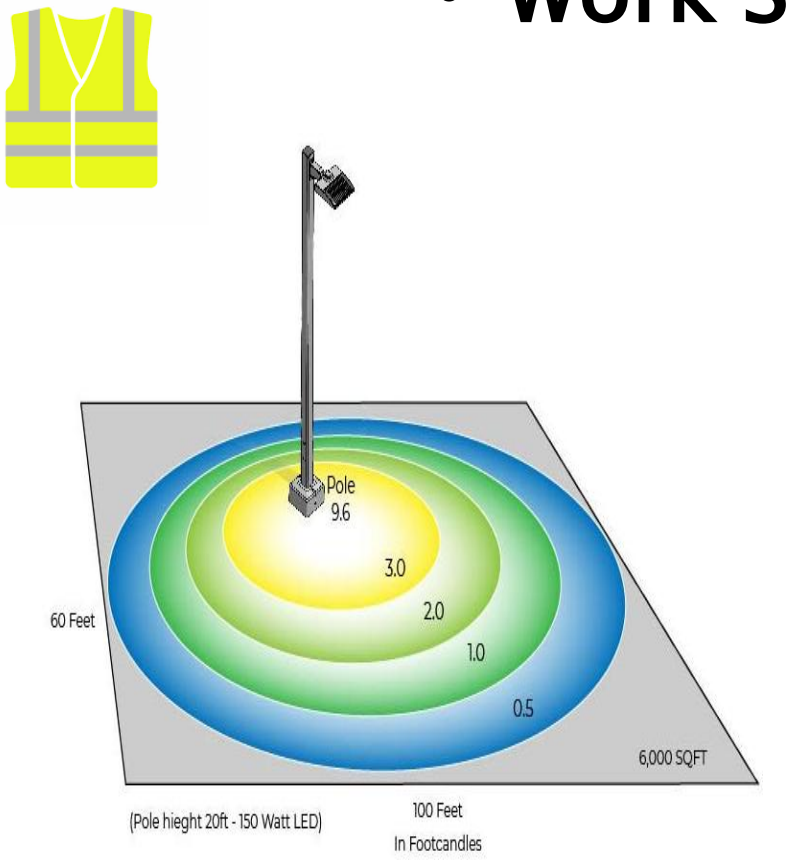
The OSH Act of 1970
General-Duty Clause,
which requires employers to:

"furnish a place of employment that is free from recognized hazards which are causing or are likely to cause death or serious physical harm to employees."

Applicable OSHA Requirements

General Duty Clause

- **Work Site Safety**



Visibility



Traffic Controls

Applicable OSHA Requirements

General Duty Clause

- Mold





- Heat & Cold Stress

Program Infrastructure



Format of OSHA Program for TS

The program has streamlined the requirements from siloed OSHA Standards into a comprehensive program:

- Plans – some topics provide a complete plan template with protocols, work practices, roles, etc. that we customized.
- Work Practices – some topics only require work practices meet requirements, which we developed.

Format of the OSHA Program for TS

Roles and Responsibilities (R&R)

- All topics delineate R&R for municipal employees:
  - TS supervisors and attendants
  - Other town employees working at TS
- Contractors must comply with federal OSHA (e.g., Lock Out/Tag Out, Confined Space, Hazard Communication).

Format of the Training Program

- OSHA 10 does not meet work specific OSHA requirements.
- Job specific requirements are based on:



  - Materials and equipment handled.
  - Chemicals used by or around employees.
  - Other hazards faced on the job.

Format of the Training Program

The training program provides separate, but coordinated training for:

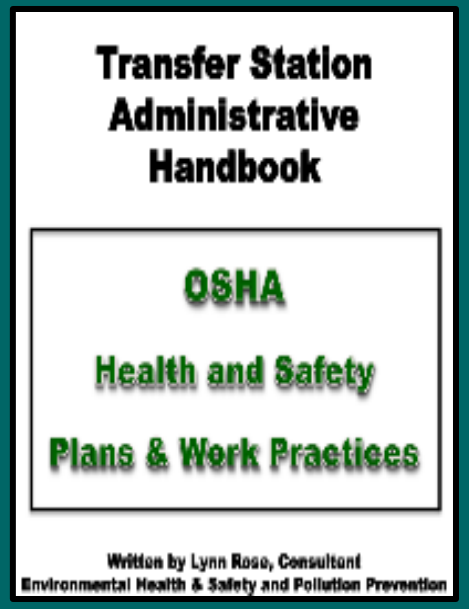
- Administrators:
  - Facilitated work sessions to develop program plans.
  - Combination of in-person and recorded sessions.





- Attendants:
  - TS operations and work practices.
  - Trainings now recorded.

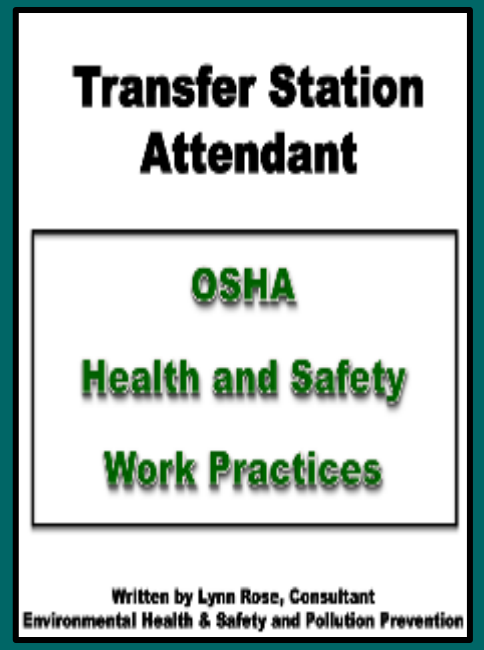
Administrative Handbook



- Hazards at TS
- OSHA Standards & Plan Templates
- Roles/Responsibilities – Town, Employees, Contractors
- Supplies and Equipment
- Recordkeeping Requirements
- Training Requirements
- Reporting Requirements
- Medical Care and Reporting

Attendant Handbook

- Responsibilities
- TS Operating Procedures
- Work Practices
- Emergency Protocols and Contacts
- Operational Tools (e.g., signs, supplies, labels, posters)
- Resources



Franklin County
Solid Waste Management District

REDUCTION
RECYCLING
COMPOSTING
DISPOSAL

OSHA Workplace Safety at Transfer Stations

Presented by Jan Ameen,
Executive Director

Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

- Municipal entity formed in 1989
- Members: 21 rural towns in western Massachusetts; 17 transfer stations
- Pop. 50,000 over 500 sq. miles
- Provide professional assistance relating to MSW, recycling, organics, hazardous waste, and everything else

MIIA versus OSHA

- In addition to OSHA requirements, there are risk management issues identified by MIIA which are intended to protect employees and users of the facility.
- For MIIA members: Risk Management Grants for training, equipment, and supplies (up to $10,000 per fiscal year).
- MIIA risk management staff have OSHA knowledge and is a resource for your town.

Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

Disclaimer:

The FCSWMD's OSHA program for TS is designed for small, rural TS.

Every facility has its own safety hazards and work practices that need to be addressed. Some hazards are similar, and some are unique.

The FCSWMD OSHA program cannot be cut and pasted as your OSHA program.

Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

Culmination of 5 years' work



Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

Things she didn't know in 2019…

- **Attendants who may be exposed to bloodborne pathogens must be offered the Hepatitis B vaccine.**
- **OSHA/DLS has a template document for accepting or declining the Hepatitis B vaccine.**

Pest Control

MA regulations only allow a licensed pesticide applicator to apply "pesticides." Attendants cannot spray for stinging insects, such as hornets and wasps unless licensed by DAR.

Most towns do not have a licensed applicator on staff to spray for hornets/wasps.

This creates a challenging situation of hiring a private company on an as-needed basis.

Refer to Massachusetts state contract FAC117 - IPM

Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

A serious issue for OSHA & MIIA – a fall into an open top rolloff or compactor opening or between wall and box (OSHA regulates as an unprotected edge.)





Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

OSHA requires fall protection for a 4-foot drop (rail height of 42” +/- 3” with mid-rail) and MIIA may request fall protection for less than 4 feet based on risk. (retaining walls below are <4’)

MIIA risk management grant for fall protection paid for custom-built railings and guardrails at transfer stations.

Custom-built railings (trash compactor)



Uline 3-rib 19” guardrail



Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

MIIA Risk Management Grant for Fall Protection

Top rail existed.
DPW added two rails.



Custom-built rail
for trash hopper



Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

MIIA Risk Management Grant for Fall Protection

Custom-built railings





Franklin County Solid Waste Management District
OSHA Workplace Safety at Transfer Stations

Summary:

The ultimate goal is to prevent harm to employees at the transfer station.

Understand all of their work duties in order to design an effective OSHA work practices program.