



# Point

June 2025



This newsletter is to inform you of recent changes & trends regarding health and safety.

The Turning Point is a monthly newsletter covering topics from various industries and sectors. The Turning Point will respond to your inquiries and inform you of current services and updates regarding

Raising the Standard Consulting Inc.



## RAISING THE STANDARD CONSULTING

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### CONSULTANT ARTICLE FEATURE

#### CHRIS MORELAND (CHST)

“CHRIS M. MORELAND WAS BORN AND RAISED IN THE SMALL CITY OF PORTSMOUTH, OHIO WHERE LOCKING DOORS TO YOUR HOME AND CAR WAS SIMPLY AN UNCOMMON THOUGHT, ATTENDING OR LISTENING TO A SPORTING EVENT ON FRIDAY NIGHTS WAS EXPECTED, AND WHERE THERE WAS NO SHAME IF YOU HAD TO BORROW EGGS, SUGAR, MILK, ETC. FROM YOUR NEIGHBOR TO COMPLETE A MEAL. CHRIS JOINED THE UNITED STATES MARINE CORPS IN 1984 WHERE HE SPENT 20 YEARS AS A HELICOPTER AND JET STRUCTURAL MECHANIC. AFTER RETIRING FROM THE USMC, CHRIS JOINED ALOHA AIRLINES AS A SAFETY AND REGULATORY COMPLIANCE INTERNAL AUDITOR UNTIL 2006. HE HAS BEEN IN CONSTRUCTION SAFETY FOR THE PAST 19 YEARS. IN JULY OF 2017, CHRIS WAS OFFERED AND ACCEPTED A POSITION WITH THE RTS CONSULTING FAMILY.”

## MEDICAL SERVICES AND FIRST AID REQUIREMENTS AT A CONSTRUCTION SITE

It's 8:00 AM on Monday, just an hour into the workday, and chaos begins to unfold. A worker running across the jobsite and screaming, "Get the foreman"! Panicked and confused, he could barely explain that his coworker had fallen on top of an unprotected piece of rebar and had been severely injured. No one knew what to do or had access to first aid kits.

The foreman contacted emergency services but was unable to provide the project address and had difficulty describing how to reach the location. Time is critical and minutes have now been wasted because this project team is unprepared for the emergency at hand.

While the story above is fictitious, similar, real life construction emergencies occur more often than you may think. Do you know what the requirements are of having medical services and first aid on a construction site? Do you know what to do in an emergency or if an accident happens on your construction site? Working in the construction industry is inherently dangerous. Implementing required medical services and first aid on your construction site increases the likelihood that everyone goes home safely at the end of the day.

The following OSHA standard serves as a guide to help you identify and comply with the requirements of providing medical services and first aid on a construction site.

### **OSHA Standard 1926.50 Medical Services and First Aid**

**1926.50(a)** Provisions shall be made prior to commencement of the project for prompt medical attention in case of serious injury.

- Assess the workplace to identify all risks that have the potential to cause injury or illness.
- Ensure that the findings of your assessment are documented and added to your employee safety orientation.

**1926.50(c)** In the absence of an infirmary, clinic, hospital, or physician, that is reasonably accessible in terms of time and distance to the worksite, which is available for the treatment of injured employees, a person who has a valid certificate in first-aid training from the U.S. Bureau of Mines, the American Red Cross, or equivalent training that can be verified by documentary evidence, shall be available at the worksite to render first aid.

- OSHA has long interpreted the term “near proximity” to mean that emergency care must be available within no more than 3–4 minutes from the workplace, an interpretation that has been upheld by the Occupational Safety and Health Review Commission and by federal courts.
- When using first-aid providers, ensure they receive first-aid training suitable for the specific workplace and that refresher training is received as required.

**1926.50(d)(1)** First aid supplies shall be easily accessible when required.

- Clearly mark and place first aid supplies where all site personnel can easily locate them. Briefing personnel on the location of first aid kits, eye wash stations, and other medical equipment during the new employee safety orientation provides initial awareness. Erect signs that identify the location of medical and emergency equipment and provide essential information for the reader.

**1926.50(d)(2)** The contents of the first aid kit shall be placed in a weatherproof container with individual sealed packages for each type of item and shall be checked by the employer before being sent out on each job and at least weekly on each job to ensure that the expended items are replaced.

**1926.50(e)** Proper equipment for prompt transportation of the injured person to a physician or hospital, or a

communication system for contacting necessary ambulance service shall be provided.

- Ensure all personnel are briefed on the following:
  - Project name
  - Project location (Formal address or street cross sections)
  - Nearest hospital

**1926.50(f)(1)** In areas where 911 emergency dispatch services are not available, the telephone numbers of the physicians, hospitals, or ambulances shall be conspicuously posted.

**1926.50(f)(2)** In areas where 911 emergency dispatch services are available and an employer uses a communication system for contacting necessary emergency-medical service, the employer must:

- Ensure that the communication system is effective in contacting the emergency-medical service; and
- When using a communication system in an area that does not automatically supply the caller's latitude and longitude information to the 911 emergency dispatcher, the employer must post in a conspicuous location at the worksite either:
  - The latitude and longitude of the worksite; or
  - Other location-identification information that communicates effectively to employees the location of the worksite.

**1926.50(g)** Where the eyes or body of any person may be exposed to injurious corrosive materials, suitable facilities for quick drenching or flushing of the eyes and body

shall be provided within the work area for immediate emergency use.

- Ensure the path to eyewash stations and showers remain clear throughout the duration of the project.

Ensure all workers are trained on the first-aid program, including what workers should do if a coworker is injured or ill. Putting the policies and program in writing is recommended to implement this and other program elements.

Conducting scheduled evaluations (emergency drills) and making necessary changes will keep the first-aid program current and prepared to handle new risks that may arise in the workplace. Regular training, inspections, and reminders help keep first aid readiness a priority, ensuring a safer environment for everyone working on-site.

**Note(s):** Important references

- OSHA3317first-aid.pdf
- 1926.50 – Medical services and first aid. | Occupational Safety and Health Administration
- Interlinking | Occupational Safety and Health Administration
- For work being performed on government projects, see Safety and Occupational Health Requirements

## Key Takeaways

Medical services and first aid play an essential role in managing injuries and avoiding serious outcomes in construction. Construction sites must have well-established and well-practiced procedures in place. Adequate training and preparation are critical for effective emergency response. Weekly inspections and maintaining the contents of first aid kits guarantee that ample supplies will be there in emergency situations. Complying with legal and regulatory requirements not only can create a safer working environment, but it will also avoid costly penalties.

Chris Moreland, CHST

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## BRIDGING THE GAP: ELEVATING SAFETY WITH VERTICAL INSPECTIONS

Safety inspections (sometimes referred to as safety rounds) are a key practice in industrial safety, helping to identify and fix hazards before they cause serious problems. Most organizations focus on horizontal safety inspections because they are easy and comfortable. However, vertical safety inspections—checking equipment and conditions at elevated locations—often get ignored. Climbing stairways, ladders and scaffolding requires extra effort, making these inspections less frequent. This neglect can lead to serious risks, as critical equipment at higher levels may have hidden hazards.

### Why Ignoring Vertical Safety Inspections is Dangerous

Many essential operations happen at heights, such as reactors, elevated piping and storage tanks. When these areas are overlooked, serious incidents can occur. Unattended corrosion, unnoticed leaks and malfunctioning pressure relief systems are some of the hidden dangers that can lead to catastrophic failures.

Consider an industrial setting where chemical reactions take place in overhead reactors. A minor unnoticed leak in a high-altitude

pipeline can lead to a significant gas release, potentially causing health hazards or fire outbreaks. The absence of routine vertical safety inspections increases the likelihood of such incidents going undetected until it is too late.

### Historical Incidents due to Missed Vertical Safety Inspections

In 2016, a devastating boiler explosion occurred at the Tampaco Foils Ltd. factory in Tongi, near Dhaka, Bangladesh, resulting in 24 fatalities and numerous injuries. Investigations revealed that the explosion was caused by poor maintenance and a lack of regular inspections, leading to undetected corrosion in the boiler system. The failure to conduct thorough vertical safety inspections allowed critical structural degradation to go unnoticed, ultimately leading to the disaster.

This incident underscores the vital importance of routine vertical inspections in preventing catastrophic failures in elevated equipment.

## Challenges in Conducting Vertical Safety Inspections

### 1. Physical Effort and Accessibility

- Climbing stairways and ladders takes effort, discouraging frequent inspections.
- Some elevated areas are difficult to reach, making checks inconvenient.
- Inspectors may experience fatigue while conducting inspections at higher altitudes, leading to oversight of crucial hazards.

### 2. Time Constraints and Priorities

- Workers focus more on horizontal inspections as they are easier and faster.
- High workloads make it hard to dedicate time to vertical safety inspections.
- Production pressure often forces operators to prioritize immediate operational needs over routine safety checks.

### 3. Lack of Awareness and Training

- Many teams do not realize the importance of checking elevated areas.
- Training programs often do not emphasize vertical safety inspections.
- Workers may not be well versed in detecting early signs of structural degradation, leaks, or corrosion in high-risk zones.

### 4. Safety Risks at Heights

- Falls and exposure to hazards make inspections dangerous.
- Lack of proper safety gear discourages inspectors from checking these areas.
- The absence of proper fall protection measures can increase the likelihood of serious injuries during inspections.

## How to Improve Vertical Safety Inspections

### 1. Make Vertical Safety Inspections Mandatory

- Create a checklist specifically for inspecting elevated areas.
- Assign responsibility to ensure these

inspections happen regularly.

- Implement standard operating procedures (SOPs) that require documentation and reporting of each vertical inspection.

### 2. Use Technology for Safer Inspections

- Drones can inspect high-risk areas without requiring workers to climb.
- Install remote sensors to monitor equipment performance in elevated locations.
- Infrared cameras and gas detection sensors can help detect leaks or overheating equipment at height without human exposure.
- AI-based predictive maintenance tools can analyze data from high-altitude equipment, predicting failures before they occur.

### 3. Train and Motivate Teams

- Conduct regular training on the importance of vertical inspections.
- Use virtual reality (VR) simulations to teach safe inspection techniques.
- Establish hands-on workshops where employees can practice safe climbing and working at height.
- Develop mentorship programs where experienced inspectors guide new employees in proper vertical safety inspections.

### 4. Provide Proper Safety Gear

- Ensure inspectors have harnesses, helmets and slip-resistant footwear.
- Implement a strict permit-to-work system for high-risk areas.
- Equip workers with portable communication devices to maintain contact while conducting

inspections in elevated zones.

#### 5. Encourage a Strong Safety Culture

- Involve leadership in vertical safety inspections to set an example.
- Recognize and reward employees who proactively report hazards in elevated areas.
- Establish a reporting system where workers can anonymously highlight unsafe conditions observed in high-risk zones.

#### KPIs for Line Managers

To ensure the effectiveness of vertical safety inspections, line managers should be measured against key performance indicators (KPIs), such as:

- Frequency of Vertical Safety Rounds Conducted—Number of documented vertical inspections per month.
- Compliance Rate—Percentage of completed vertical inspections versus scheduled inspections.
- Hazards Identified and Mitigated—Number of safety issues reported and resolved from vertical inspections.
- Training Participation—Percentage of workers trained on vertical safety practices.

#### Basic Checklist for Vertical Safety Inspections

In conclusion, ignoring vertical safety inspections can lead to serious incidents, as shown in past cases. Many workers avoid them due to the extra effort required, but the risks of skipping them are too high. Organizations must make vertical safety inspections a priority by integrating technology, providing training, and ensuring proper safety equipment.

To ensure a holistic safety approach, industries must evolve their inspection strategies. With the right combination of mandatory inspections, technological advancements, training programs, and strong leadership, vertical safety inspections can become a standard practice rather than an overlooked duty. A complete safety approach must cover all levels—ground and heights—to protect people and assets effectively.

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#### Temperature

Should be consistently below 80°F to be exempt from certain requirements



#### If over 80°F

Employer must provide drinking water (1 quart per employee per hour)  
Access to shade, or Air-conditioned break room



#### If over 90°F

15-minute paid rest breaks every two hours

# Proposed OSHA Heat Regulations

## HEAT INJURY AND ILLNESS PREVENTION IN OUTDOOR AND INDOOR WORK SETTINGS RULEMAKING

An informal public hearing on OSHA's Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule is scheduled to be held virtually and begin on June 16, 2025.

Heat is the leading cause of death among all hazardous weather conditions in the United States. Excessive heat in the workplace can cause a number of adverse health effects, including heat stroke and even death, if not treated properly. According to the Bureau of Labor Statistics, 479 workers in the U.S. died from exposure to environmental heat from 2011–2022, an average of 40 fatalities per year in that time period. Additionally, there were 33,890 estimated work-related heat injuries and illnesses that resulted in days away from work from 2011–2020, an average of 3,389 per year in that time period. However, these statistics for occupational heat-related illnesses, injuries, and fatalities are likely vast underestimates.

Workers in outdoor and indoor work settings without adequate climate controls are at risk of hazardous heat exposure. Certain heat-generating processes, machinery, and equipment (e.g., hot tar ovens, furnaces, etc.) can also cause hazardous heat when cooling measures are not in place. Some groups may be more likely to experience adverse health effects from heat, such as pregnant workers, while others are disproportionately exposed to hazardous levels of heat, such as workers of color in essential jobs who are more often employed in work settings with high risk of hazardous heat exposure.

### Current Status

An informal public hearing on OSHA's Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings proposed rule is scheduled to be held virtually and begin on June 16, 2025. The period to submit a Notice of Intention to Appear (NOITA) closed on May 2, 2025. Further information and instructions for viewing the hearing will be posted in the coming weeks.

On August 30, 2024, OSHA published in the Federal Register a Notice of Proposed Rulemaking (NPRM) for Heat Injury and Illness Prevention in Outdoor and Indoor Work Settings. This is a significant step toward a federal heat standard to protect workers. The proposed standard would apply to all employers conducting outdoor and indoor work in all general industry, construction, maritime, and agriculture sectors where OSHA has jurisdiction. The standard would require employers to create a plan to evaluate and control heat hazards in their workplace. It would clarify employer obligations and the steps necessary to effectively protect employees from hazardous heat. The ultimate goal is to prevent and reduce the number of occupational injuries, illnesses, and fatalities caused by exposure to hazardous heat.

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# Raising The Standard

# RTS

## CONSULTING INC.

### **RTS First Aid/CPR/AED (4-8 hour)**

This 4-8 hour course covers the required elements for full certification: Set-Up & Site Evaluation, primary assessment, rescue breathing, CPR Techniques, choking management, control of bleeding, shock management and hands-on auto external defibrillator (AED) training.

### **RTS Competent Person Fall Protection (8-hour)**

This eight-hour Fall Protection Competent Person Safety Course will provide an understanding of fall protection with a focus on personal fall protection systems to increase worker safety while working at heights. This training will cover the requirements of Occupational Safety and Health Administration (OSHA), Hawaii Occupational Safety and Health (HIOSH) and EM 385-1-1.

**For more information please contact Hailey Mesner at [hmesner@rtsconsulting.com](mailto:hmesner@rtsconsulting.com)**

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### **TRAINING SERVICES**



Raising the Standard Consulting will raise the standard of EH&S in your organization through the development of new and innovative strategies and programs driven by your own individual needs.

We want to build relationships with our clients to help create lasting change in their organizations. Contact us today to build a safer tomorrow.

With Aloha,

Stanford Brown, B.Sc., CSP, CSHP, CRSP, CHSC, Senior  
Consultant, President & CEO