



Point

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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

NATHAN BROWN, CIT & CHST

NATHAN HAS BEEN LIVING IN HAWAII FOR THE PAST 15 YEARS AND WORKING AS A SAFETY TRAINER, AUDITOR AND ONSITE REPRESENTATIVE FOR 8. DURING THIS TIME GROWING IN HIS KNOWLEDGE AND EXPERIENCE IN THE CONSTRUCTION SAFETY FIELDS. THROUGH RECEIVING & CONDUCTING TRAININGS, EXPERIENCES IN THE FIELD AND STATISTICS ACROSS THE INDUSTRY, FALL HAZARDS AND THEIR SPECIFIC, CUSTOMIZABLE CONTROLS HAS BECOME A HIGHLIGHTED POINT OF INTEREST, LEADING TO HIS CHOICE OF TOPIC FOR THIS ARTICLE.

DEFYING GRAVITY: THE HIDDEN DANGERS OF FALLS AT LOW HEIGHTS IN CONSTRUCTION

Falls remain the undisputed leading cause of death in construction, accounting for 38.% of construction fatalities in 2022 according to the Bureau of Labor Statistics. At this point most workers & construction management teams know that working above 6 feet without fall protection is unsafe and against OSHA & EM

385-1-1 general construction regulation, unfortunately sometimes that's all people consider when working at height.

Too often as soon workers are above 6 feet they're given just a harness,

lanyard and anchor point to tie off and not much consideration is given to if the equipment being used is right for the work being done and the hazard being faced.

However, looking at a study from 2015 titled "How High is Deadly", compiled from 5 years of accidents, injuries & fatalities on construction sites, we see that falls from a variety of heights are still dangerous.

to be a larger number of people and chances for accidents to occur. Another reason is that because it's such a common height to do work, people are more casual about the work, getting complacent about working at height and are more likely to make mistakes because of it. A third reason is the danger that exists when using a conventional 6ft energy absorbing lanyard while working within those 10 feet.



As you can see the largest percentage of deaths from falls isn't in the 30ft + range, even though that includes any number of feet above 30. It's actually in the 5ft zone of 11-15ft. If we open that up to 11-20ft, those 10 feet account for 37.1% of all deaths from falls on construction sites.

There are multiple reasons for this, the first being that it's a common height for construction work to happen, so there's going

Determining Fall Distance

Fig.1

The calculation used to determine fall distance may vary slightly from publication to publication, but they are generally similar, containing four factors. Whenever determining fall distance with a standard, non-retracting lanyard measure it from the **anchor** to the nearest level below

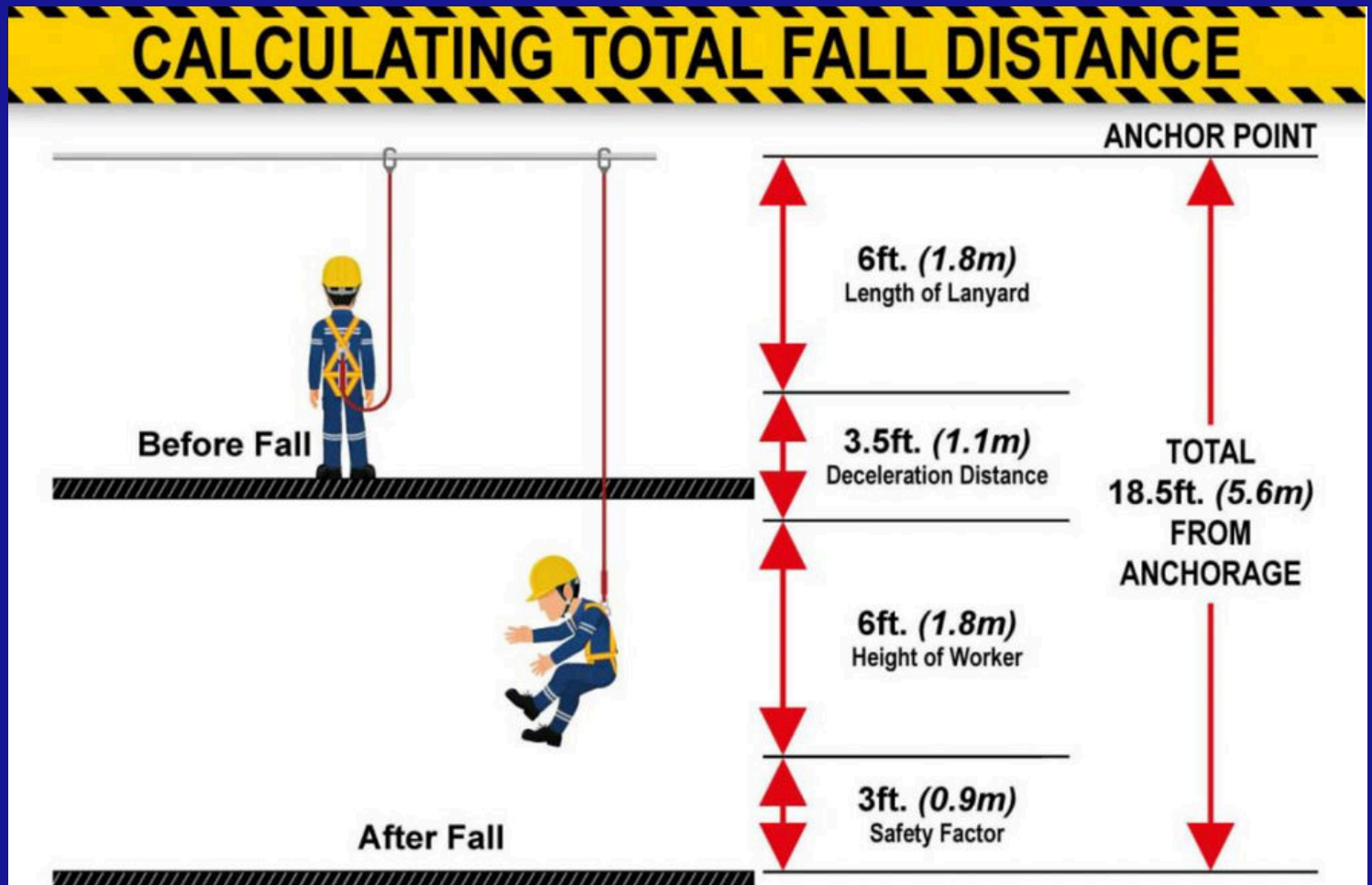
- Worker Height: Usually 6ft. is used for

the sake of a round number, can be customized for individual workers.

- Lanyard Length: **6ft.**
- Deceleration Device: **3.5ft.** is the distance prescribed by OSHA, be sure to check your lanyard
- Safety Factor: Between **2** and **3** feet, to ensure that during the stretch or bounce of the lanyard doesn't cause the worker's feet to hit the ground/lower surface.

surroundings than they would be if they realized how unprotected they are.

Another height to focus on from that study is below six feet, which is under OSHA & EM 385-1-1's threshold for construction, is still responsible for 8.2% of fall fatalities. With falls being responsible for just over a third of all



What this means is that, if a worker is tied off with a standard nonretracting lanyard less than ~18ft from the ground or nearest obstruction to them they may still hit it, despite believing they were protected while working, creating a fall distance danger zone of false confidence in the protective systems. This is especially dangerous due to how people act when they think they're protected, being less careful and considerate of their

deaths on construction sites that means falls from below 6ft are responsible for ~2.75% of all deaths on construction sites. As with working in the fall distance danger zone, complacency that can come from working at heights below this benchmark has dire consequences.

Fall protection isn't a binary thing like

Fig. 2

a lightswitch on or off, either protected or not. The specific heights the work is happening at, the material of the ground or nearest lower level, any obstructions, anchor point location, worker size, specific work being done and many other factors must be considered in order to select the correct options and keep workers protected. Fall protection also isn't as easy as flicking a lightswitch. There are so many different pieces of equipment that interact with each other in different ways. Any workers relying on a form of fall protection to keep them safe must be trained on the equipment, its uses and especially its limitations. Without knowing those limitations a worker can make dangerous assumptions about their safety & protection.

Stay Safe. Stay Secure. Protect Yourself and Your Workers at Every Height.

Image sources

Fig. 1 *Fatal occupational injuries incurred by workers in the construction industry due to falls to a lower level, 2011-2015.* Bureau of Labor Statistics Injuries, Illnesses, and Fatalities. (IFF). Accessed Aug. 7th 2025, <https://stopconstructionfalls.com/training/infographics/>

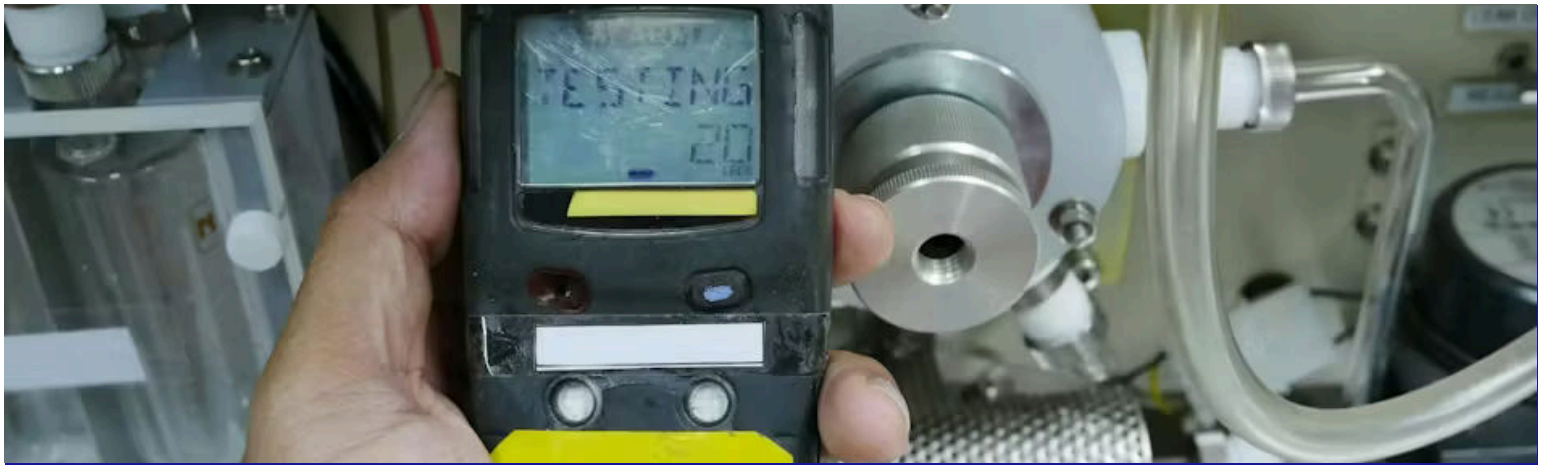
Fig. 2 *What are Fall Arrest Systems & How do they Work,* Reece Safety, Andy Graham Nov. 2023. Accessed Aug. 7th 2025, <https://www.reecesafety.co.uk/what-is-a-fall-arrest-system/>

Nathan Brown, CIT & CHST

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Raising The Standard

RTS



WHEN GAS DETECTORS EXPIRE: HOW TO AVOID SAFETY RISKS AND DISPOSE OF EQUIPMENT THE RIGHT WAY

Disposing of gas detection equipment can be deceptively complex for EHS managers, facility supervisors and maintenance personnel. Gas detectors contain hazardous materials (e.g., lead, mercury or electrochemical sensors) that require specialized e-waste handling. Simply tossing them in the trash risks environmental contamination and may violate local disposal laws. Expired calibration gases are also classified as hazardous waste and have their own set of disposal protocols.

Across industries, disposal procedures are often informal or undocumented and can result in expired detectors in storage, missing disposal records or outdated vendor agreements. When active hazards take precedence over day-to-day operations, it's easy for end-of-life equipment handling to take a back seat.

Don't wait for audits or inspections to expose these gaps. Build a proactive disposal plan that includes the following steps.

Poor Storage Shortens Equipment Life: Why Safe Disposal Starts Long Before Expiration

Proper storage is often the most overlooked step in managing gas detection equipment through its full lifecycle. How you store gas detectors and calibration gases directly affects how long they last and how safe they are to handle after expiration.

For instance, most electrochemical sensors have a shelf life of six to 12 months when stored between 68 and 77°F (20 and 25°C) and away from high humidity. This

temperature range helps preserve the integrity of the electrolyte and other sensitive components within the sensor. Similarly, calibration gases (especially reactive blends) can degrade or depressurize before their printed expiration date if not kept upright in a cool, dry and ventilated environment.

Here are some essential practices to extend safe usability and simplify end-of-life handling:

- Label inventory with shelf life and expiration dates. Clearly marking each item with both its shelf life and expiration date helps teams monitor gas stability and avoid using degraded or unsafe supplies. Shelf life refers to how long a product can be stored before use, while expiration (or lifespan) indicates how long it remains effective once activated or deployed.
- Secure with mounting brackets or wall chains. To prevent tipping, leaks or accidental damage, store gas detectors and calibration gases in their original packaging until they're ready for use. Use wall-mounted brackets, racks or chains to keep cylinders upright and stable, especially in high-traffic or vibration-prone areas where unsecured containers pose a safety risk.
- Implement a first-in, first-out (FIFO) system. Organize your inventory so that older stock is used before newer items. This simple rotation method helps minimize waste, ensures calibration gases and sensors are used within their effective lifespan, and reduces the likelihood of discovering expired equipment during audits or inspections.

Treating storage as part of your disposal plan fosters a “start smart, end safe” culture. It also minimizes surprises during inventory reviews or inspections.

When No One Owns it, Everyone is at Risk: Why Clear Roles are Critical for Safe Disposal

Gas detection equipment disposal works best when it’s a shared responsibility among EHS managers, facility supervisors and maintenance personnel.

Here’s how teams can take ownership and streamline the process:

- Assign clear roles. Designate who’s responsible for identifying expired equipment, who handles storage and who coordinates with disposal vendors. This division of labor prevents last-minute scrambles, ensures accountability, streamlines communication and reinforces a proactive safety culture.
- Create a disposal checklist. A clear, step-by-step checklist ensures consistency, reduces errors and keeps disposal tasks from falling through the cracks, especially in busy facilities with rotating staff. Include essential actions such as removing lithium-ion batteries, devalving the cylinder and ensuring it’s empty and without pressure, documenting serial numbers, and verifying vendor handoff procedures. Post the checklist in shared workspaces and embed it in digital standard operating procedures (SOPs) so it’s always within reach. This practice not only streamlines training and hand overs but also reinforces accountability and compliance during audits or inspections.
- Schedule quarterly inventory reviews. Waiting for an audit to uncover expired

minimum wage, overtime, and leave violations under the Fair Labor gas detectors or calibration gases is a reactive approach that can lead to compliance violations, wasted resources or even safety risks. By proactively reviewing your inventory every quarter, teams can identify aging equipment before it becomes a liability, rotate stock more efficiently and ensure that all devices in use are within their functional lifespan.

Proactively assigning disposal oversight to a specific role, backed by a documented process, helps ensure expired materials are handled promptly and properly. It also reinforces a strong culture of accountability—where safety doesn’t end when equipment stops working.

Avoid Fines and Safety Risks: How to Dispose of Gas Detectors and Calibration Gases the Right Way

Once gas detectors and calibration gases reach the end of their usable life, these items are often considered hazardous waste due to their chemical makeup, pressurized components or embedded electronics. Mishandling them can result in fines, environmental liabilities or even workplace accidents.

Here’s how to dispose of them safely and responsibly:

- Segregate components into their raw components. Gas detectors often contain lithium batteries, electrochemical sensors, circuit boards and casings made of mixed

materials. Lithium-ion batteries, for instance, pose fire and environmental risks if not fully depleted and handled correctly. Even partially discharged batteries can spark fires if tossed into standard waste streams. As such, these components should be removed and sorted according to local e-waste, battery recycling and hazardous materials guidelines. If you're unsure, refer to the device's Material Safety Data Sheet (MSDS) for instructions.

- Devalve and depressurize calibration gas cylinders. Before disposal, all calibration gas cylinders should be fully emptied and depressurized. Use manufacturer-approved tools (e.g., C-10 or CGA 600 devalver, depending on cylinder size and type) to release residual gas safely. Once empty, mark the cylinder clearly and follow local guidelines for recycling or disposal. Some vendors may accept returned cylinders for reuse or recycling.
- Partner with certified e-waste recyclers or disposal vendors. Partner with a certified electronics recycling facility or hazardous waste vendor familiar with industrial safety equipment. These providers can handle the separation, neutralization or safe destruction of toxic components and help ensure compliance with the U.S. Environmental Protection Agency (EPA), Occupational Safety and Health Administration (OSHA) and local regulations. Some vendors may offer mail-in disposal services for retired gas monitors. This service ensures proper dismantling and disposal while minimizing administrative burden.
- Document the disposal process. Maintain records that show when and how each piece of equipment was disposed of, who handled the task, and which vendor or facility processed it. Having this

documentation on hand can be invaluable during audits or environmental compliance reviews.

This deliberate approach allows even the busiest facilities to close the loop on gas detection safety and avoid costly missteps.

Compliance Without the Guesswork: The Value of a Trusted Disposal Partner

Even with the best internal protocols, gas detection equipment disposal can quickly become overwhelming without the appropriate support. That's where experienced vendors come in—not just as service providers but as strategic partners who understand the nuances of hazardous waste regulations, e-waste handling and calibration gas disposal.

[...]

With the right safety equipment partner, you can focus on what matters most—protecting your people and keeping operations running smoothly—without getting bogged down by administrative hurdles or regulatory guesswork.

When gas detectors expire, a smart disposal plan protects your people, your compliance record and your peace of mind.

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UNDERSTANDING ESG RISKS

As the increased emphasis on ESG performance continues, a new report from Supplier.io, points out the critical need for businesses to apply the same rigor to ESG reporting as they do to financial metrics.

The report provides these key findings:

Environmental Risk: Environmental risks are a pressing concern, with greenhouse gas (GHG) emissions standing out as the most significant threat, affecting 73% of companies.

Water withdrawal and consumption is a concern with 49% of companies impacted by water pollution from supply chain activities, including the discharge of untreated wastewater, chemical pollutants, and plastic waste. Furthermore, 67% of companies face risks from water usage and scarcity.

Air pollution is a major problem with 56% of companies reporting they are impacted by air pollution, primarily from supplier activities in transportation and manufacturing.

Additionally, 72% of companies face risks from lack of managing their products' environmental and social impacts throughout the product lifecycle.

Social Risk: the report found that 54% of companies encounter worker health and safety risks.

Governance Risk: A large percentage of companies, 45%, said they face risks related to unethical business conduct, such as bribery and corruption.

Companies are required to report on the ESG impact of their suppliers, as a result of mandates including the Corporate Sustainability Reporting Directive. Yet, 45% of companies are exposed to significant risks due to inadequate supply chain transparency and management.

And 43% of companies face risks related to unethical business conduct, such as bribery and corruption.

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WASHINGTON SOLAR INSTALLER CITED AGAIN FOR FALL HAZARDS, FACES OVER \$250K IN NEW FINES

A company in the residential solar panel installation industry is repeatedly failing to protect its workers from the risk of falling off the roofs they work on. The Washington State Department of Labor & Industries (L&I) recently fined Purelight Power LLC more than \$250,000 for the latest violations.

[...]

The employees who work on the homes spend their days on rooftops, lifting, carrying, and installing or removing the panels, often at significant height. Washington law requires employees who work four feet off the ground or higher to have and use protection against the danger of falls. This includes work on walking surfaces, like rooftops, excavations, and around dangerous equipment.

Fall protection like anchored ropes and harnesses matter because falls in construction are common: more than 1,600 workers are injured in falls every year

in Washington. It's one of the leading causes of death in the construction industry, and it is entirely preventable with the right equipment, training, and safety practices.

Company knowingly allows employees to work without fall protection

In this case, L&I inspectors found two Purelight Power (formerly Solgen Power) workers removing solar panels to allow for installation of a new roof on a Vancouver home. The men were working 15 feet off the ground on a steep-pitched roof without wearing fall protection gear.

"No homeowner wants someone to get hurt or killed while working on their roof," said Cari Anderson, deputy assistant director for L&I's Division of Occupational Safety and Health. "The public should absolutely take advantage of L&I's resources and information online to look into the safety history of the companies they're hiring."

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RTS CP Fall Protection – 8hr

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.

RTS HAZCOM – 4hr

In this course the requirements of Occupational Safety and Health Administration (OSHA), Hawaii Occupational Safety and Health (HIOSH) and EM 385-1-1 will be covered. Upon completion of this course students will be familiar with hazard determination, hazardous chemical list, safety data sheets, definitions associated with hazard communications and hazard labeling systems.

For more information please contact Hailey Mesner at hmesner@rtsconsulting.com

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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