

# Running an Effective Driver Safety Program – Reducing Accidents and Improving OSHA Compliance

SPRING 2010  
CONFERENCE

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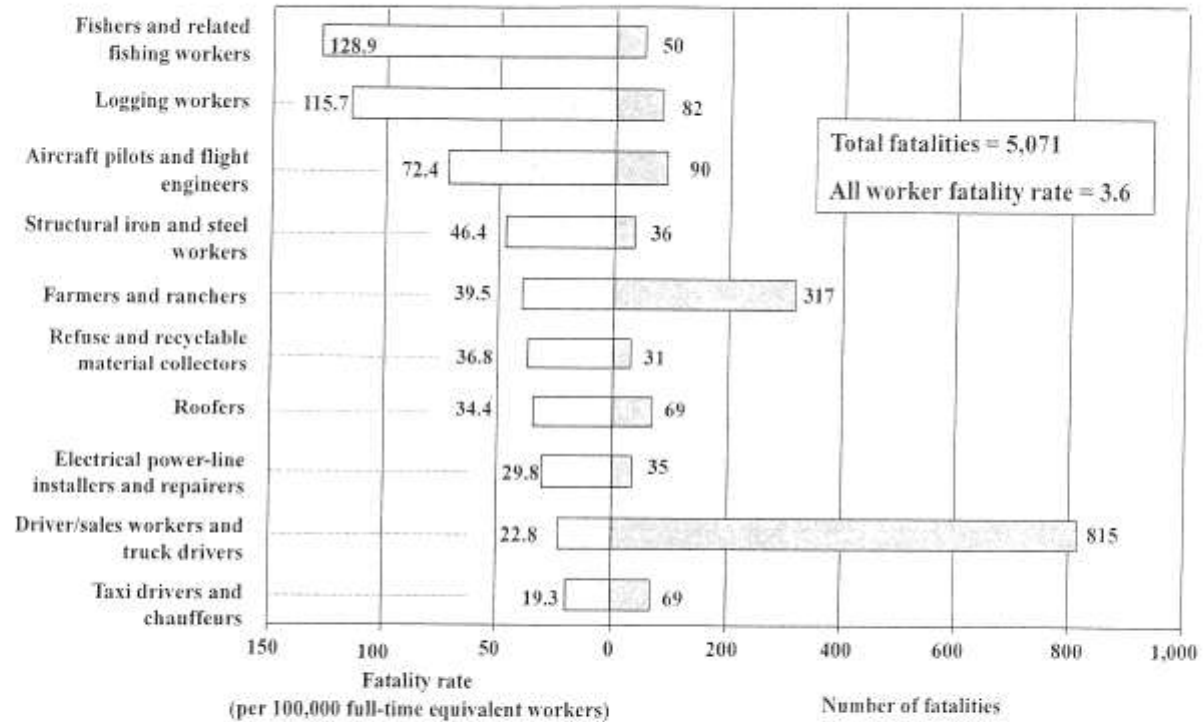


# Solid Waste Fatality Data

- Waste/recycling collection workers have the 6<sup>th</sup> highest fatality rate in the United States!
  - 36.8 per 100,000 workers (31 in 2008).
  - 10 times higher than the national average.
- The fatality rate in 2008 increased compared to 2007. Disproportionate number are at small haulers and local governments.
- About 15-20 more employees are killed each year at transfer stations, landfills and recycling facilities.
- 46 known fatalities in 2009 – Majority were at small collection companies and non-members.

# Solid Waste Fatality Data

Selected occupations with high fatality rates, 2008\*



Fatal work injury rates were highest for fishers, logging workers, and aircraft pilots and flight engineers in 2008.

\*Data for 2008 are preliminary.

NOTE: In 2008, CFOI implemented a new methodology, using hours worked for fatality rate calculations rather than employment. For additional information on the fatality rate methodology changes please see <http://www.bls.gov/tif/oshnotice10.htm>.

SOURCE: U.S. Bureau of Labor Statistics, U.S. Department of Labor, 2009.

# Solid Waste Injury Data

Solid waste employees also have high injury and illness rates:

	<u>Injury Rate</u> (2008)
Waste Collection	7.7 per 100
Waste Disposal	4.8 per 100
• Landfill	5.5 per 100
• MRFs	7.0 per 100



The injury rate for the solid waste industry has declined by more than 20% over the past five years. Preliminary 2009 data indicates a continued decline.

# Solid Waste Accident Data

Solid waste vehicles are also involved in many accidents causing fatalities, injuries and property damage to third parties:

- Solid waste vehicles were involved in crashes involving 97 fatalities and 2,428 injuries to third-parties in 2005.
- More than 25 third party fatalities in 2010.



# Top 5 Reasons Why You Should Care About Safety

5. Safe workplaces have lower turnover.
4. Image with customers/community.
  - Some customers are using safety in choosing a hauler.
3. Don't want attention from OSHA or other enforcement agencies



# Top 5 Reasons Why You Should Care About Safety

2. \$

Having accidents and injuries costs you lots of money!  
Even if an accident is not your fault, you may settle because it's cheaper/easier.

- Property damage/personal injury claims.
- Higher workers compensation/injury costs.
- Lawyers.
- Overtime.



1. Want to avoid killing/hurting workers or third-parties.
  - Moral issue
  - Morale issue



# Changing Worker Behavior is Key

- The majority of accidents and injuries are caused by unsafe BEHAVIOR, not unsafe conditions.
- Safety = getting adults to change their unsafe behavior.
- This is not easy – and the culture in our industry doesn't help!





# Most Common Injuries & Accidents

## Solid Waste Collection:

1. Backing – 25% of all accidents – #1 in Frequency
2. Rear End Collisions – Attention and Speed – #2 in Frequency
3. Intersections – High Cost Accidents
4. Struck By – Other Vehicles/PPE – *Slow Down to Get Around*
5. Falls Off Truck – Riding Step/Speed
6. Lifting/Pushing – Heavy/Bulky Trash or Containers - #1 injury
7. Tipovers – Speed/Seatbelt
8. Crushing (Container) – Maintenance issue
9. Lock Out Tag Out – Cleaning behind the blade, maintenance
10. Overhead Hazards – Power lines, bridges, trees
11. Sharps/Medwaste/Chemicals – PPE
12. Hands and Eyes – Gloves and safety glasses
13. Weather-related (heat/ice/snow or rain)

# Transfer Stations/Landfills/MRF's

Fewer injuries, but accidents can have fatal consequences.  
– collisions, falls, maintenance, ergonomic injuries.

- All employees need to wear PPE.
- Need to remind customers about safety rules.
- Pre-trip and post-trip on heavy equipment.
- Lock Out Tag Out (LOTO)
- Follow traffic directions and speed limit rules.
- Stay close to vehicle.
- **NO SCAVENGING**—not even beer!





# Decision Making – On the Route

What bad decisions do solid waste drivers make?

1. Not fit for work
2. Inadequate Pre-Trip or Post-Trip
3. Rushing/Excessive Speed
4. Personal Protective Equipment (PPE)
5. Not wearing a safety belt
6. Cell phones, texting and other distractions
7. Lack of communication with helper or other drivers

Route observation is the best way to address these issues.




# OSHA Compliance & Regulations

- Every single business day, an OSHA inspector shows up at a solid waste company to perform an inspection.
  - 280 federal inspections in SIC Code 4953 in 2009!
- Employees with high injury rates are vulnerable to OSHA inspections.
- In addition, FMCSA, State Police and others are conducting truck weight and other safety inspections.



# OSHA Compliance

1. The average OSHA safety inspection lasts 20 hours.
2. Nearly half of inspected workplaces in SIC 4953 receive citations.
  - Since January 2009, NC OSHA has issued citations in nine of 17 solid waste inspections (total of 35 citations).
3. The amount of OSHA penalties to our industry has more than doubled since 2006.
4. The average penalty has increased from \$800 to \$1,400 over the past few years.



# OSHA Compliance – Recent Inspections

Two recent inspections demonstrates OSHA is much more interested in issuing big penalties to solid waste companies:

1. Transfer station cited in December 2009 under Site-Specific Targeting (SST) program was fined \$212,400 for willful and serious violations (LOTO, guarding).
2. A hauler was fined \$304,200 in August 2009 for failing to address hazards identified during a 2008 inspection (Hazcom, flammable danger, forklift training).



# OSHA Compliance – Lessons

1. Don't get into the OSHA SST Program!
2. Don't ignore maintenance (or anything else).
3. Fix what OSHA tells you to fix.
4. Reduce penalties through informal conference.



# Top 5 OSHA Violations – SIC 4953

Hazard Communication – provide information to employees re chemicals in the workplace, through MSDS's, labels and training.

Lockout Tagout – shutting down vehicles or machines to protect employees from unexpected startup.

Electrical Equipment/Systems – protecting employees against hazards involving electricity.

Powered Industrial Trucks – forklifts – training.

Respiratory Protection – protecting workers from fumes, dust, etc. (PPE).



# OSHA Regulations & Enforcement

The Obama Administration has increased OSHA's enforcement budget by 10% and is hiring more inspectors.

Congress may pass a law increasing OSHA's authority and penalties.

OSHA is proposing new regulations that will be challenging to comply with and/or increase costs (e.g., Combustible Dust, Hazard Communication).

OSHA may be taking a first step towards regulating MSD's (proposed change to OSHA 300 log).



# DOT Regulatory Issues

- Texting Ban for “Interstate” CDL Drivers – Up to \$2,750 fine.
  - Proposed cell phone limits expected later this year.
- Hours of Service – DOT considering making changes.
  - Revised proposed HOS rule expected later this year.
  - Final HOS rule by July 2011.
  - More lawsuits likely.
- Sleep Apnea – NTSB letter to DOT.



# DOT Regulatory Issues – CSA 2010

CSA = Comprehensive Safety Analysis. It is replacing the Safestat Program.

CSA 2010 is a new way of using safety data to reduce accidents.

Three Key Elements:

1. Safety Measurement System – Seven SMS categories of carrier and driver performance data; weighted by risk and includes warnings/traffic citations.
2. Intervention – New sliding scale from warning letter to inspection to Notice of Claim.
3. Safety Evaluation – DOT will use SMS information to determine carrier's safety fitness (continue to operate; marginal; unfit).

More information: <http://csa2010.fmcsa.gov>



# How to Reduce Fatalities, Accidents & Injuries

1. Look at your injury logs and workers comp. data:
  - What is most common? (frequency)
  - What is most expensive? (severity)
2. Driver Training:
  - New drivers – how long? (two weeks or two hours)
  - Coaching the Refuse Driver/Smith System.
  - Pre-trip and post-trip inspections.
3. Helper Training:
  - Lifting – videos, hands-on.
  - Riding on side.
  - Dealing with traffic.
  - Wearing PPE.



# How to Reduce Fatalities, Accidents & Injuries

## 4. Route Observation:

- Observe workers on routes.
- Coach if not following rules: Talk to them not at them.

## 5. Safety meetings.

## 6. Accident Investigation:

- Root cause analysis.

## 7. Incentives/Discipline:

- Individual rewards (e.g., X yrs no accident).
- Group rewards (e.g., x months no accident/injury).
- Progressive discipline – 3 strikes v. zero tolerance.
- Recession means employers have more leverage to get workers to change behavior or face consequences.



# How to Reduce Fatalities, Accidents & Injuries

## 8. Medical Management:

- A light duty program is an effective way to get a worker back to work.

## 9. Equipment/Technology:

- Cameras, event recorders, lighting packages, collision avoidance systems, software, etc.

## 10. Routing/Workload.

## 11. Paint the Back of the Truck.

# Communication is Key

Communicate to your frontline workers that safety is a core value:

- Signs/posters
- Coaching
- Video/Training/Meetings
- Use humor



Make it personal: Be safe for your family and/or to keep your job.



# Solid Waste Safety – Resources

- EIA/NSWMA/WASTECC
  - *Safety Monday*
  - *Slow Down to Get Around*
  - ANSI Standards
  - *Be Safe Be Proud* Safety Videos
  - Training Programs
  - Driver of the Year Program
  - Concorde (drug/alcohol testing)
- [www.nswma.org](http://www.nswma.org)
- [www.wastec.org](http://www.wastec.org)
- [davidb@envasns.org](mailto:davidb@envasns.org)
- OSHA ([www.osha.gov](http://www.osha.gov))
- NC Department of Labor ([www.nclabor.com](http://www.nclabor.com))
- Insurance company/brokers
- Safety-oriented companies