



California and Federal Legal EHS Drivers

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December 10, 2018

Agenda



I. Chemicals & Constituents

- Asbestos
- Mercury
- PFAS
- Crystalline Silica



II. Modernizing Workplaces

- Robotics and AI
- Temporary Worker Safety Initiative



**Occupational Safety
and Health Administration**

U.S. Department of Labor



III. Political Changes

- Public Disclosures
- OSHA Enforcement
- Private Cal/OSHA Lawsuits in California

Introduction and Themes



Federal Rollbacks

- EPA and Chemical Regulations
- Federal OSHA and Public Disclosures



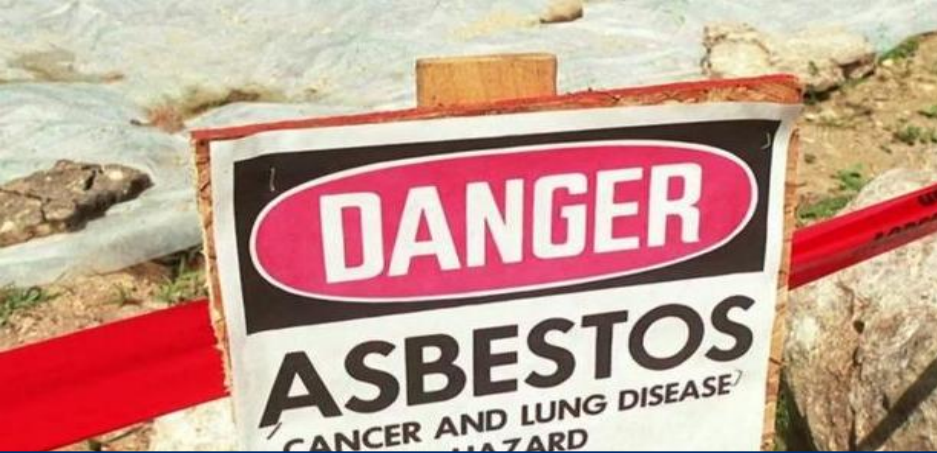
State Action and Deviation

- State Legislation on PFAS Exposure
- Private Cal/OSHA Actions in California



Federal Progress

- Crystalline Silica OSHA Regulations
- Center for Occupational Robotics Research



I. Chemicals & Constituents

Asbestos

Asbestos Regulation: Context

- Banned in more than 60 countries worldwide, including the U.K., every member of the EU, and Australia
- Use of asbestos is regulated in the United States
 - “Asbestos Ban and Phaseout Rule of 1989” struck down as unconstitutional in *Corrosion Proof Fittings, et al. v. EPA and Reilly*, 947 F.2d 1201 (5th Cir. 1991)
- Still used in variety of products (brake pads, automobile clutches, corrugated sheeting, firefighters’ clothing)
- Raw crystalline asbestos imported by chlorine manufacturers

Asbestos

Proposed Significant New Use Rule (SNUR) for Asbestos

- Gives EPA authority under TSCA to approve “significant new uses” of certain products containing asbestos
- Companies must notify EPA at least 90 days before they begin manufacturing or processing these asbestos-containing products

- Adhesives, sealants, and roof and non-roof coatings
- Arc chutes
- Beater-add gaskets
- Extruded sealant tape and other tape
- Filler for acetylene cylinders
- High-grade electrical paper
- Millboard
- Missile liner
- Pipeline wrap
- Reinforced plastics
- Roofing felt
- Separators in fuel cells and batteries
- Vinyl-asbestos floor tile
- And any other building material (other than cement).

Asbestos

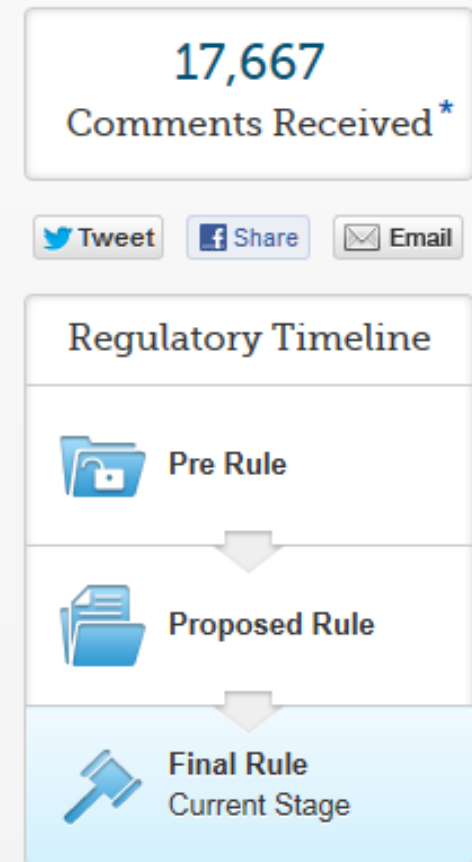
Arguments For and Against Proposed New Significant Rule

EPA	OPPONENTS
Listed products/uses not specified in current asbestos regulations	Many listed products/uses have fallen out of favor anyway
Manufacturers of these products were not required to notify EPA	Reassessing these products/uses could bring them back to use
Will give EPA better picture of asbestos use in US	Review process does not consider historic asbestos use data
Will give EPA authority to prohibit or limit harmful exposures	Review does not consider all asbestos fibers
Is necessary step to potential full ban of asbestos one day	Will ultimately lead EPA to classify asbestos as less of a threat

Asbestos

Proposed SNUR for Asbestos: Regulatory Timeline

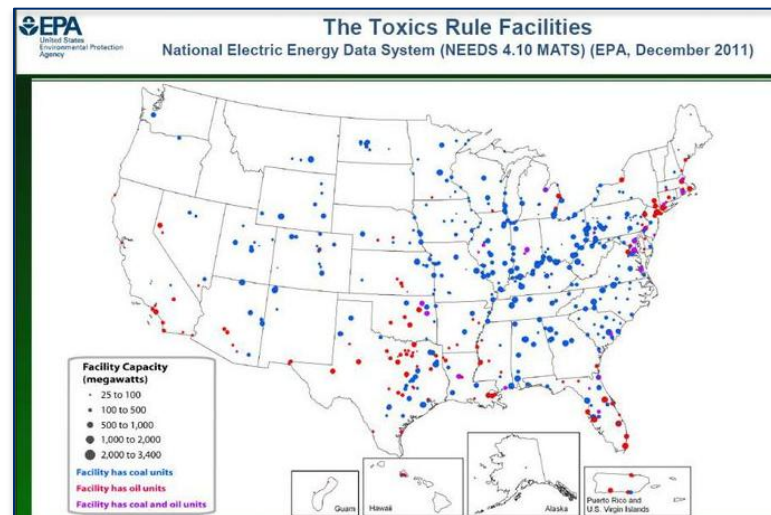
- June 1, 2018 – SNUR Proposed
- August 10, 2018 – Public Comment Period Ended
- January 2019 – EPA Plans to Finalize SNUR



Mercury

Mercury and Air Toxics Standard (MATS)

- October 2018: EPA announced it is considering recalculating Obama EPA's economic analysis supporting MATS
- MATS: Obama EPA Clean Air Act regulation that set limits on air pollutants including mercury, arsenic, and metals
- Affected 550 power plants, primarily in middle part of U.S.



Mercury

- Clean Air Act: EPA must take any *appropriate and necessary* actions to regulate hazardous air pollution
 - *Appropriate and necessary* includes weighing the benefits of a proposed regulation against the costs
- Obama EPA Analysis – “Benefits” of a regulation can include “co-benefits” – accompanying benefits that stem from a regulation and are not direct results of regulating the target chemical.

Benefits	Costs
\$6 million : health benefits of lower mercury reductions	\$9.6 billion – industry costs for complying with MATS standards
\$37-90 billion : benefits of reduced soot and nitrous oxide reductions from pollution control equipment	
Total - \$37.06-\$90.06 billion	Total - \$9.6 billion

Mercury

- Trump EPA's Recalculated Position:
 - EPA cost-benefit analyses should focus on the **specific impact of a rule** (here, mercury)
 - EPA should not consider accompanying benefits that stem from installing new pollution controls on equipment



I just think it's a little fuzzy math when you say, "Reduce mercury, and we have all these other benefits over here as the shiny object."

Andrew Wheeler

Mercury

- New cost-benefit calculation analysis could redefine how the Clean Air Act is implemented and lead to additional regulations being rolled back

Benefits	Costs
\$6 million: health benefits of lower mercury reductions	\$9.6 billion – industry costs for complying with MATS standards
\$37-90 billion: benefits of reduced soot and nitrous oxide reductions from pollution control equipment	
Total - \$6 million	Total - \$9.6 billion

Per- and Polyfluoroalkyl Substances (PFAS)

- Family of about 3,500 chemical compounds (including PFOA/PFAS)
- Classified as *Group 2A: Probably Carcinogenic to Humans* by IARC
- Used to make non-stick paper products (i.e., microwave popcorn bags)
- Also used as fire retardant and firefighting foam
- Used in chrome plating, electronics manufacturing, and oil recovery
- Highly soluble and cannot be removed by standard wastewater methods

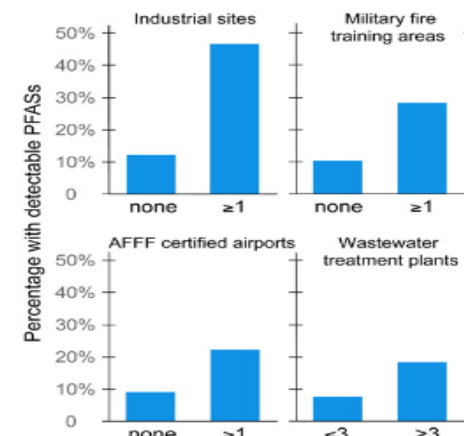
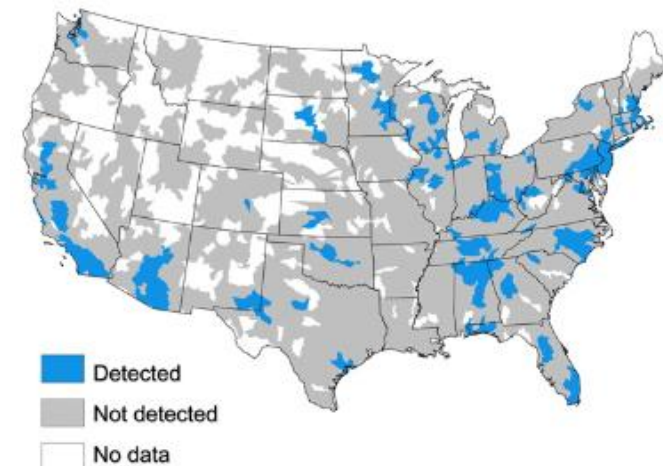


PFAS

2016 Harvard Study on PFAS Contamination*

- Unsafe levels of PFAS found in 33 states' drinking water
- 13 states contained 75% of hydrological units with PFAS detections
- Includes hydrological units in both Los Angeles and Bay Area
- Detections most commonly found at industrial sites, military fire training areas, and AFFF certified airports

Hydrological units with detectable PFASs



*Hu, Xindi, et al., "Detection of Poly- and Perfluoroalkyl Substances (PFAS) in U.S. Drinking Water Linked to Industrial Sites, Military Fire Training Areas, and Wastewater Treatment Plants." *Environ. Sci. Technol. Lett.*, 2016 3 (10), pp 344-350.

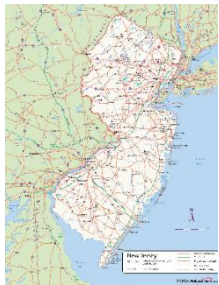
PFAS

Federal Regulation

- EPA –nonenforceable healthy advisory in 2016 for PFOA and PFOS levels at a combined 70 parts per trillion (ppt)
- May 2018 – EPA announces that PFOA and PFOS may eventually be classified as hazardous substances for waste site cleanups
- June 2018 – Department of Health & Human Services releases study concluding “minimal risk level” for combined PFOA and PFOS should be 7-10 times lower than EPA advised level
- September 2018 – EPA official tells congressional panel EPA will decide by the end of 2018 whether to initiate multiyear process to develop MCLs for PFOA and PFAS

PFAS

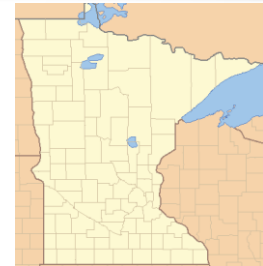
- Some states are taking action given perceived slow progress of federal government
- 6 states have advisory drinking water limits for PFOA and/or PFAS (3 are stricter than EPA's level)
- New Jersey has set an enforceable standard for PFNA and proposed standards for PFOA and PFOS



- PFNA Standard – 13 ppt
- Proposed PFOS – 13 ppt
- Proposed PFOA – 14 ppt



- PFOS Advisory – 13 ppt
- PFOA Advisory – 14 ppt



- PFOS Advisory – 27 ppt
- PFOA Advisory – 35 ppt

PFAS

State of Washington Legislation on PFAS

- Begun rulemaking process to set drinking water standard
- 2018 – First state in the country to pass legislation outlawing certain products with PFAS

Washington Revised Code Section 70.75A

- Bans the use of PFAS-containing firefighting foam for training
- Requires manufacturers of firefighting PPE containing PFAS to disclose presence of chemical
- Will ban manufacture, distribution, and sale of firefighting foam containing PFAS (July 2020)

Washington Revised Code Section 70.95G

- Bans use of PFAS in paper food packaging (i.e., popcorn bags, french fry boxes) effective January 1, 2022
- Ban is conditioned on State Department of ecology finding a safer alternative to PFAS for food packaging

Crystalline Silica

- Crystalline Silica – basic component of soil, granite, and other minerals; quartz is the most common form
 - Can be inhaled when workers chip, cut, drill, or grind objects
 - Roughly 2 million American workers are exposed
 - Recognized as a threat to human health since the 1930s
 - Most common health effect is silicosis
 - Recognized as a cause of lung cancer
- 1996: “If It’s Silica, It’s Not Just Dust” Campaign to eliminate overexposure

Non-Malignant	Malignant
Alveolar Proteinosis (Acute Silicosis)	Lung Cancer
Parenchymal Fibrosis (Silicosis)	
Tuberculosis	
Connective Tissue Disease	
Chronic Renal Failure	
COPD	



Crystalline Silica

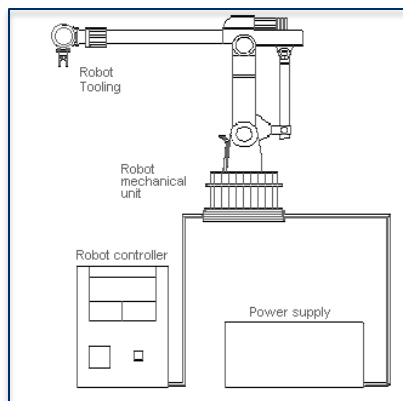
- June 2016: OSHA enacted regulations to prevent overexposure to crystalline silica
 - Former Labor Secretary Tom Perez, “**I’m sorry it took so long.**”
- OSHA: enacted two separate standards
 - Construction (effective October 23, 2017)
 - General Industry and Maritime (effective June 23, 2018)
- Common elements between standards
 - Exposure limit of 50 micrograms per cubic meter of air (ug/m³) per 8 hours
 - Requirement that employers provide respirators to workers with especially high exposure to silica dust
 - Requirement that employers offer confidential medical exams to workers exposed for more than 30 days per year to exposures above 25 ug/m³ per 8 hours



II. Modernizing Workplaces

Robotics and AI

- Not only are robots becoming more common in the workplace, but also the roles of robots are changing
- Likelihood that OSHA will implement robotic-specific workplace regulations in the future
 - No current regulations specifically covering use of robots in the workplace
 - 1987: published “Guidelines for Robotics Safety”



“Robots are generally used to perform unsafe, hazardous, highly repetitive, and unpleasant tasks.”

OSHA, 1987

Robotics and AI

Center for Occupational Robotics Research (CORR)

- October 2017 – OSHA, NIOSH, and the Robotics Industries Association signed an alliance agreement to create CORR
- Goals
 - Work together to enhance OSHA and NIOSH's technical expertise
 - Improve awareness of workplace hazards with robots
 - Identify areas of needed research to reduce hazards



Robotics and AI

Center for Occupational Robotics Research

- Research Plan: research traditional industrial robots and emerging robotic technology (i.e., drones and AI)
 - May 2018: Requested public comment for research prioritization suggestions; received 2 comments
- Identified at least 61 robot-related workplace deaths between 1992 and 2015



Dawn Castillo, Director, NIOSH
Division of Safety Research

“We suspect fatalities will increase over time because of the growing number of industrial robots being used by companies in the U.S.”

Robotics and OSHA Violations

OSHA can issue citations relating to robotics incidents under its existing regulatory framework

Case Study: July 2016

- Temporary assembly line worker entered a robotic station after an assembly line had stopped to clear a sensor fault
- The worker was crushed when the machine abruptly restarted and killed
- OSHA: issued 23 violations to the host employer and fined staffing agency. Violations included:
 - Failing to use energy-control procedures to prevent machine restart
 - Failing to provide safety locks to isolate hazardous energy
 - Exposing employees to crushing and amputation hazards

Temporary Worker Safety

OSHA Temporary Worker Initiative (TWI)

- Temporary workers are becoming more common in workplaces across the country
- OSHA launched TWI in June 2014 in response to concerns that temporary workers were not afforded the same protections as permanent employees
- Has released 9 advisory bulletins, including 2 in 2018

TWI BULLETIN NO. 9



Temporary Worker Safety

Temporary Worker Initiative Highlights

- Both the host employer and staffing agency are responsible for maintaining safe work environments for temporary workers
- Host employers are generally in a better position to understand hazards on their own worksite.
- Host employers remain liable for the following, regardless of contractual agreements with staffing agencies, including:
 - Ensuring workers have adequate PPE
 - Ensuring workers receive adequate, site-specific training
- As workplaces become more modern, it is critical to ensure that temporary workers are properly trained and protected



**Occupational Safety
and Health Administration**

U.S. Department of Labor



III. Political Change

Federal OSHA Summary

Changes to Public Disclosure Practices

Reduced Enforcement

Reduced Advisory Panel Roles

Federal OSHA: Public Disclosure Practices

- July 2018: OSHA announced a proposed rule that would eliminate the requirement that employers with 250 or more employees electronically file OSHA Forms 300 and 301, and that these forms be made public
 - OSHA Form 300 – Log of Work-Related Injuries and Illnesses
 - OSHA Form 301 – Injury and Illness Incident Report
- Under proposed rule, all employers with 20 or more employees in designated industries would only be required to e-file their Form 300A general summary of workplace illnesses and injuries
- OSHA: Proposed rule will help protect worker privacy

Federal OSHA: Public Disclosure Practices

OSHA Form 300 Log (E-Filed and Public Under Current Rule)

OSHA's Form 300 (Rev. 04/2004)
Log of Work-Related Injuries and Illnesses

Note: You can type input into this form and save it. Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#). In addition, the forms are programmed to auto-calculate as appropriate.

Attention: This form contains information relating to employee health and must be used in a manner that protects the confidentiality of employees to the extent possible while the information is being used for occupational safety and health purposes.

Year 20

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

Please Record:

- Information about every work-related death and about every work-related injury or illness that involves loss of consciousness, restricted work activity or job transfer, days away from work, or medical treatment beyond first aid.
- Significant work-related injuries and illnesses that are diagnosed by a physician or licensed health care professional.
- Work-related injuries and illnesses that meet any of the specific recording criteria listed in 29 CFR Part 1904.8 through 1904.12.

Reminders:

- Complete an Injury and Illness Incident Report (OSHA Form 301) or equivalent form for each injury or illness recorded on this form. If you're not sure whether a case is recordable, call your local OSHA office for help.
- Feel free to use two lines for a single case if you need to.
- Complete the 5 steps for each case.

Establishment name

City State

Step 1. Identify the person

(A) Case no.	(B) Employee's name	(C) Job title (e.g., Workers)	(D) Date of injury or onset of illness (e.g., 2/10)	(E) Where the event occurred (e.g., Loading dock north end)	(F) Describe injury or illness, parts of body affected, and object/substance that directly injured or made person ill (e.g., Second degree burns on right forearm from acetylene torch)
Reset <input type="button" value=""/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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Step 2. Describe the case

Step 3. Classify the case
SELECT ONLY ONE circle based on the most serious outcome:

Remained at Work			
Death (G)	Days away from work (H)	Job transfer or restriction (I)	Other recordable cases (J)
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Step 4.
Enter the number of days the injured or ill worker was:

Away from work (K)	On job transfer or restriction (L)
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
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<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Step 5.
Select one column:

Illness					
Injury (M)	Skin disorder (1)	Respiratory condition (2)	Poisoning (3)	Hearing loss (4)	All other illnesses (5)
<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Page totals

Page of

Public reporting burden for this collection of information is estimated to average 14 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-1644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Save Input

Add a Form Page

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Federal OSHA: Public Disclosure Practices

OSHA Form 300A (Only Public Filing Under Proposed Rule)

OSHA's Form 300A (Rev. 04/2004)

Summary of Work-Related Injuries and Illnesses

All establishments covered by Part 1904 must complete this Summary page, even if no work-related injuries or illnesses occurred during the year. Remember to review the Log to verify that the entries are complete and accurate before completing this summary.

Using the Log, count the individual entries you made for each category. Then write the totals below, making sure you've added the entries from every page of the Log. If you had no cases, write "0."

Employees, former employees, and their representatives have the right to review the OSHA Form 300 in its entirety. They also have limited access to the OSHA Form 301 or its equivalent. See 29 CFR Part 1904.35, in OSHA's recordkeeping rule, for further details on the access provisions for these forms.

Note: You can type input into this form and save it.
Because the forms in this recordkeeping package are "fillable/writable" PDF documents, you can type into the input form fields and then save your inputs using the [free Adobe PDF Reader](#).

Year 20

U.S. Department of Labor
Occupational Safety and Health Administration

Form approved OMB no. 1218-0176

Number of Cases

Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	0	0	0
(G)	(H)	(I)	(J)

Number of Days

Total number of days away from work	Total number of days of job transfer or restriction
0	0
(K)	(L)

Injury and Illness Types

Total number of . . . (M)			
(1) Injuries	0	(4) Poisonings	0
(2) Skin disorders	0	(5) Hearing loss	0
(3) Respiratory conditions	0	(6) All other illnesses	0

Post this Summary page from February 1 to April 30 of the year following the year covered by the form.

Public reporting burden for this collection of information is estimated to average 58 minutes per response, including time to review the instructions, search and gather the data needed, and complete and review the collection of information. Persons are not required to respond to the collection of information unless it displays a currently valid OMB control number. If you have any comments about these estimates or any other aspects of this data collection, contact: US Department of Labor, OSHA Office of Statistical Analysis, Room N-3644, 200 Constitution Avenue, NW, Washington, DC 20210. Do not send the completed forms to this office.

Establishment information

Your establishment name

Street

City State Zip

Industry description (e.g., Manufacture of motor truck trailers)

North American Industrial Classification (NAICS), if known (e.g., 336212)

Employment information (If you don't have these figures, see the Worksheet on the next page to estimate.)

Annual average number of employees

Total hours worked by all employees last year

Sign here

Knowingly falsifying this document may result in a fine.

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Federal OSHA: Public Disclosure Practices

Comparison of Publicly Available Information

Current Rule (OSHA Form 300 Log)

Proposed Rule (OSHA Form 300A)

For each reported injury or illness:

Total number of:

- Date of Injury or Illness
- Location of the Injury on the Jobsite
- Description of the injury or illness
- Classification of the Case
 - Death
 - Requiring Days Away From Work
 - Requiring Job Transfer/Restriction
- Number of Days Away From Work
- Classification of the Event as an Injury or as Specific Type of Illness
- *Worker Name is Redacted*

- Cases
 - Deaths
 - Requiring Days Away From Work
 - Requiring Job Transfer/Restriction
- Number of Days
 - Away From Work
 - Requiring Job Transfer/Restriction
- Injury and Illness Types
 - Total Number of Injuries and Specific Injury Classes

Federal OSHA: Public Disclosure Practices

- Under the Obama Administration, worker fatalities were displayed prominently on the OSHA homepage

The screenshot shows the OSHA homepage with a red header containing the Department of Labor logo, social media icons, and a search bar. Below the header is a navigation menu with categories like 'For Workers', 'For Employers', and 'Law & Regulations'. The main content area features a 'Labor Rights Week 2016' banner with three images of workers and a text box explaining the event. Below the banner are three sections: 'IN FOCUS' with a 'Know Your Rights!' link, '4,821 workers died on the job in 2014' with a fatality report for Arturo Acosta, and 'HOW TO...' with links for filing a complaint, getting a poster, and reporting injuries.

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety and Health Administration

For Workers - For Employers - Law & Regulations - Data & Statistics - Enforcement - Training & Education - News & Publications

Labor Rights Week 2016

During Labor Rights Week, OSHA reminds **ALL** workers of their right to a safe and healthful workplace. Join us Aug. 29 - Sept. 4 for an event in your area.

IN FOCUS

[en español](#) *Know Your Rights!* [Learn more](#)

4,821 workers died on the job in 2014

LA: Arturo Acosta died from heat stress 5/14/2016
1 construction job site. pulling win

Fatality Reports

HOW TO...

- [File a complaint](#)
- [Get a FREE OSHA poster](#)
- [Get information on reporting severe work-related injuries, illnesses and fatalities to OSHA](#)

Federal OSHA: Public Disclosure Practices

- In August 2017, OSHA removed information about worker fatalities from its homepage.

UNITED STATES DEPARTMENT OF LABOR

Occupational Safety and Health Administration

ABOUT OSHA ▾ WORKERS ▾ EMPLOYERS ▾ REGULATIONS ▾ ENFORCEMENT ▾ TOPICS ▾ NEWS & PUBLICATIONS ▾ DATA ▾ TRAINING ▾

Data and Statistics
Commonly Used Statistics
High Penalties by State
Fatality Reports
Inspection Search by Establishment
Inspection Search by Number
BLS Injury/Illness Statistics

TAKE ACTION

- Contact OSHA
- File a safety and health complaint
- Report a death or severe injury
- Get whistleblower information

NEWS [More News](#)

November 7, 2017
U.S. Department of Labor Resumes Regular Enforcement in Florida and Georgia

November 7, 2017
U.S. Department of Labor Cites Georgia Parts Manufacturer After Injuries Reveal Hazards

October 27, 2017
U.S. Department of Labor and New York Manufacturer Reach Settlement to Improve Safety and Health

OSHA WORKING WITH EMPLOYERS

- Training
- Compliance Assistance
- Cooperative and Recognition Programs

Below are just a few examples of our cooperative programs that work with and recognize employers who create safe workplaces.

State Farm at Park Center GA: Partnership will

Federal OSHA: Public Disclosure Practices

- Worker fatalities that do not result in a company citation are no longer included in OSHA's fatality list.
- Going forward, OSHA's fatality list will only include fatalities recorded in the states and territories that OSHA regulates directly.
 - Fatalities reported in the 26 states that administer their own OSHA programs will not be included in the fatality list.

Federal OSHA: Reduced Enforcement

Reduction in EPA Enforcement Units

- To encourage “quality over quantity” with inspections, EPA has used a weighted *enforcement unit* point system to measure enforcement actions
- Enforcement units dropped from 2016 to 2017 and during the first five months of fiscal year 2018

2016	2017	Oct 2016 – Feb 2017	Oct 2017 – Feb 2018
42,900	41,829	15,806	14,643

Federal OSHA: Reduced Advisory Panel Roles

- OSHA sponsors 5 advisory committees that advise on workplace safety and health issues and whistleblower protection
 - Advisory Committee on Construction Safety and Health
 - National Advisory Committee on Occupational Safety and Health
 - Federal Advisory Council on Occupational Safety and Health
 - Maritime Advisory Committee for Occupational Safety and Health
 - Whistleblower Advisory Committee
- September 2017: President Trump issues executive order continuing certain advisory committees
 - Did not continue any of OSHA's committees
 - Committees have not met since the executive order was signed

California & Private Cal/OSHA Lawsuits

*Solus Industrial Innovations, LLC v. Superior Court**

- Held that private parties can sue employers for Cal/OSHA violations
- Background
 - Explosion at Solus left two employees dead
 - DOSH issues five citations to Solus for alleged violations of Cal/OSHA regulations, and Solus appeals
 - Orange County District Attorney files lawsuit against Solus for alleged violations of CA Unfair Competition Law and Fair Advertising Law
 - Premise – By maintaining an unsafe work environment, Solus engaged in unlawful business practices and falsely represented commitment to workplace safety

*4 Cal. 5th 316 (2018)

Solus v. Superior Court

- Court of Appeal – overruled trial court’s denial of Solus’ demurrer and held that Federal OSHA preempted UCL and FAL claims arising from Cal/OSHA violations
- Cal. Supreme Court – unanimously reversed the decision
 - Federal OSHA identifies specific enforcement actions (such as workers’ comp.) that are not preempted by OSHA
 - However, Federal OSHA does not identify specific enforcement actions that are preempted by OSHA
 - By allowing states to provide broader protections than the federal government, Federal OSHA anticipates that states may use enforcement actions other than administrative litigation to further their aim
 - Civil litigation is not foreclosed by the statutory scheme, and its use does not conflict with Federal OSHA’s objectives

Themes



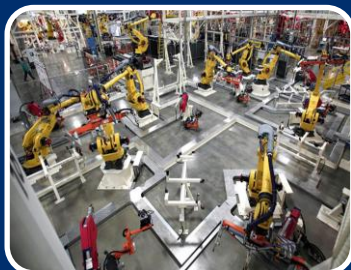
Federal Rollbacks

- EPA and Chemical Regulation (Asbestos, Mercury)
- Federal OSHA and Public Disclosures



State Action and Deviation

- State Legislation on PFAS Exposure
- Private Cal/OSHA Actions in California



Federal Progress

- Crystalline Silica OSHA Regulations
- Center for Occupational Robotics Research

Questions?