CONN-OSHA QUARTERLY

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Top Stories

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OSHA's 29 CFR 1910.184 - Slings

A Safety Officer's Perspective

By Jeffrey Saltus, Occupational Safety Officer

I have been a CONN-OSHA safety officer for over thirty years. Throughout my career, one standard I always revisit is 29 CFR 1910.184, which covers the use of slings in the workplace. Slings, in simple terms, are flexible lifting devices used to move heavy loads with cranes, hoists, and other lifting equipment. These include chain slings, wire rope slings, metal mesh slings and synthetic web slings. Because of the inherent hazards in lifting operations, OSHA's regulations ensure that employees and employers follow precise safety measures to prevent accidents, injuries, and fatalities. See hazard corner on page 4.

From my perspective, the primary purpose of 1910.184 is to protect employees by defining best practices for sling selection, use, inspection, and maintenance. By adhering to these regulations, we not only fulfill our legal responsibilities but also maintain a safe work environment for the employees. Slings can fail for a variety of reasons - overloading, wear and tear, or exposure to harsh environments - and the standard prescribes detailed requirements to address each of these risks.

Selection and Use

Selecting the right sling for the job is the first step in preventing incidents. In my line of work, I always stress the importance of considering the load's weight, shape, and type before choosing the sling material and design. For instance, a chain sling is often favored when working with high-temperature materials or extremely heavy loads because of its durability. On the other hand, a synthetic web sling might be appropriate when handling fragile or delicate loads, as it reduces the risk of damage to surfaces.

1910.184 requires that each sling be clearly labeled or tagged with its rated capacity. I've seen employers penalized for ignoring this detail, so I always double-check that the load rating and sling identification match. Another critical point is ensuring that slings are never used above their rated capacities. This means regular communication and coordination with the employees lifting the loads, confirming the load's weight and balancing the load properly.

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Chain


Wire Rope


Metal mesh


Synthetic

Source of photo: PA Department of Labor & Industry

Inspection and Maintenance

In my experience, regular sling inspections are vital to detecting problems early. OSHA outlines three types of inspections:

1. Initial Inspection: A newly acquired sling - whether new or repaired - must be thoroughly inspected before its first use.
2. Daily or Pre-Use Inspection: The standard mandates a visual check each day a sling is used. Any signs of damage - such as cuts, fraying, corrosion, or missing identification tags - means it's time to remove the sling from service immediately.
3. Periodic Inspection: A more thorough inspection must be conducted periodically, depending on how frequently the sling is used and the working conditions. The frequency can vary, but many employers conduct quarterly or annual audits. However, such inspections shall not be at intervals greater than once every 12 months. During these inspections, certified inspectors measure wear, check for deformities, and evaluate overall integrity.

From a safety inspector's vantage point, the removal of damaged slings is one of the most critical directives of 1910.184. Slings with damaged parts, questionable welds, or excessive wear must be taken out of service until they are either repaired by a qualified person or replaced altogether. The employer shall make and maintain a record of the most recent month in which each lifting sling was thoroughly inspected.

Training and Documentation

Another essential component of 1910.184 is proper training. In every facility I visit, I stress the importance of instructing employees on the correct methods of rigging and lifting. Workers should know how to select the appropriate sling, inspect it for defects, and correctly attach it to the load. Proper rigging techniques can be the difference between a successful lift and a catastrophic failure. A well-informed workforce is a safer workforce.

Documentation is also pivotal. Maintaining clear records of inspections, repairs, training programs, and load tests provides a clear trail of compliance. It shows that the employer takes safety seriously and that all procedures meet OSHA's guidelines.

Why It Matters

From my perspective as a safety inspector, the reason 1910.184 exists goes beyond mere regulatory compliance. At its core, this standard safeguards lives. When we protect employees and anyone in the vicinity of a lifting operation, we foster a culture of safety that enhances productivity and morale. By selecting appropriate slings, performing diligent inspections, and prioritizing training and documentation, we minimize the risk of accidents and demonstrate our commitment to upholding the highest safety standards.

I've seen firsthand how a clear understanding and strict adherence to 1910.184 helps employers maintain an accident-free environment. If your team follows these guidelines, you'll be well on your way to ensuring that every lift - and every worker - stays safe.

Consider requesting a safety consultation for a review of the slings that you use on your jobsites.

Requesting a Consultation

To learn more or request your free consultation from CONN-OSHA:

Call us at 860-263-6900, or visit our webpage

Remember! OSHA Injury and Illness Recordkeeping and Reporting Requirements

1 **Post** your 300A Summary at your workplace February 1 through April 30.

2 **Submit** your Injury and Illness data to the Injury Tracking Application by March 2.

Learn More

How Should Building Owners and Employers Communicate the Locations and Hazards of Asbestos to Employees?

By Mark Trotochaud, Occupational Hygienist

Asbestos is a naturally occurring fibrous mineral fiber. Once called the "Magic Mineral", asbestos had many attractive properties for a building owner. It does not rust, rot, or decay. The fibers do not burn and are chemically inert. Products made with asbestos fibers have excellent insulation properties and are essentially fireproof. However, asbestos fibers are carcinogenic and cause lung cancer, mesothelioma, and asbestosis. Although domestic manufacture of asbestos building materials was phased out in the early 1980's, building owners of older public and commercial buildings may encounter asbestos products used as insulation in the boiler rooms/mechanical spaces and in the floor tiles and mastic used to cover the rooms and corridors of their facility.

Employees engaged in housekeeping activities in public and commercial buildings with installed asbestos containing materials may be exposed to asbestos fibers. Most of these workers are covered by OSHA's general industry standard, 29 CFR 1910.1001. Employees who perform construction work or housekeeping activities during and after construction activities are covered by the asbestos construction standard, 29 CFR 1926.1101. Building owners are often the only and/or best source of information concerning the presence of previously installed asbestos containing building materials. Therefore they, along with employers of potentially exposed employees, should communicate the presence, location and hazards of asbestos in the building.

Asbestos Identification and Labelling Duties

Building owners are responsible for determining the presence, location and quantity of asbestos containing material (ACM) or presumed asbestos containing material (PACM) at their facilities. Employers and building owners are required to treat installed thermal system insulation (TSI) and sprayed on and troweled-on surfacing materials as PACM in buildings constructed no later than 1980. Asphalt and vinyl flooring material installed no later than 1980 also must be treated as asbestos-containing. The employer or building owner may demonstrate that PACM and flooring material do not contain asbestos by having asbestos sampling performed by a licensed asbestos inspector. Building owners should maintain records of the presence, location and quantity of ACM and PACM in their buildings. The records should be kept for the duration of ownership and should be transferred to successive owners.

Building owners must inform employers of employees who will perform construction work or housekeeping activities in (or adjacent to) areas which contain ACM and/or PACM of the presence and location of ACM and/or PACM. For example, at the entrance to mechanical rooms/areas in which employees reasonably can be expected to enter and which contain ACM and/or PACM, the building owner shall post signs which identify the material which is present, its location, and appropriate work practices which, if followed, will ensure that ACM and/or PACM will not be disturbed. The employer shall ensure, to the extent feasible, that employees can comprehend these signs. Means to ensure employee comprehension may include translation of signs and warning labels for non-English speaking workers.

Training for Employees

OSHA's asbestos standard for general industry at 29 CFR 1910.1001(j)(7)(iv) requires employers to provide an asbestos awareness training course for employees who perform housekeeping operations in areas where an ACM or PACM are present. Housekeeping activities include waxing and buffing vinyl asbestos floor tiles and cleaning any asbestos building materials. The elements of the training must include the health effects of asbestos; locations, signs of damage and deterioration of ACM and PACM; the proper response to asbestos fiber release episodes; and the standard's requirements related to housekeeping. This training must be held annually and conducted so that all employees understand it. In addition, general industry and construction employers should include asbestos in the programs they establish to comply with the Hazard Communication Standard, 29 CFR 1910.1200.

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The reason OSHA's standard contains this training requirement for employees who perform housekeeping operations in facilities where ACM or PACM is present is because OSHA learned during its rulemaking process that there was evidence of asbestos disease among school custodians. OSHA believed that significant exposures to custodians resulted when they dry buffed floor tile and cleaned up accumulations of friable (damaged) material with no knowledge or concern about asbestos hazards, such as when insulation debris had fallen to the floor because it was so badly deteriorated. If your custodial workers are contract employees, their employers must provide the above asbestos awareness training to their employees.

Information for Occupants and Tenants

Building owners, in addition to informing building workers as required by OSHA, should also inform occupants and tenants about the location and physical condition of the ACM, and stress the need to avoid disturbing the material.

In Summary

The information given to workers and building occupants should address the following points to the extent they reflect building conditions:

- ACM has been found in the building and is located in areas where the material could be disturbed (e.g., ceilings in Rooms 101 and 102, walls in the lobby, above suspended ceilings in the main corridor, on columns in the front entry, on pipes in the boiler room).
- The condition of the ACM, and the response that is appropriate for that condition.
- Asbestos only presents a health risk when fibers become airborne and are inhaled. The mere presence of intact ACM may not represent a health risk.
- Do not disturb the ACM (e.g., do not push furniture against the ACM, do not damage thermal system insulation).
- Report any evidence of disturbance or damage of ACM to (name, location, and phone number).
- Report any dust or debris that might come from the ACM or PACM, any change in the condition of the ACM, or any improper action (relative to ACM).
- Cleaning and maintenance personnel are taking special precautions during their work to properly clean up any asbestos debris and to avoid disturbing ACM.
- All ACM is inspected periodically, and additional measures will be taken if needed to protect the health of building occupants.

OSHA and EPA materials were sourced for this article.

Hazard Corner

Construction worker is crushed by steel beams when overloaded nylon slings fail

A 24-year-old male construction worker died after steel beams fell on him when the nylon slings that were carrying them failed. The decedent and a co-worker were unloading a delivery truck that contained approximately 42,000 pounds of structural steel. A 450-ton crane on site was assisting with the unloading process. The lifting procedure was discussed with the decedent and co-worker's senior supervisor on-site. The first and second lifts were done without incident. The senior supervisor then left the job site to perform other responsibilities. The construction workers rigged the rest of the steel and picked it up as one load, instead of the three separate loads as planned. No consideration was given to the rated capacity of the slings, devices to protect the nylon slings from the sharp edges of the steel, or a tag line to guide the steel being lifted. The first and second loads weighed approximately 8,700 pounds apiece. The third load was approximately 24,000 pounds. The lift was near its maximum radius when

the nylon slings failed, dropping its load on top of the decedent.

The FACE investigator determined that, in order to prevent future occurrences, employers, as part of their Injury and Illness Prevention Program, should:

- Ensure that nylon slings are not overloaded.
- Ensure chafing material is used to protect nylon slings from sharp edges.
- Ensure elevated loads are controlled with tag lines.
- Ensure crane operators making lifts are aware of the rating capacity of the rigging devices used to lift the load.

Summary from a Fatality Assessment and Control Evaluation (FACE) Program Report.

Virtual Training Schedule

Noise and Hearing Conservation *2/5/25*	OSHA requires a hearing conservation program whenever employee noise exposures equal or exceed an 8-hour time-weighted average sound level (TWA) of 85 decibels measured on the A scale (slow response) or, equivalently, a dose of fifty percent. This class will provide an overview of 29 CFR 1910.95, Occupational Noise standard.
Stairway and Ladder Safety *3/13/25*	An overview of stairway and ladder safety will be discussed during this course. Falls from stairways and ladders result in thousands of injuries per year. Basic types of ladders and stairways, hazards and methods to prevent those hazards, and the OSHA requirements will be covered.
Control of Hazardous Energy (LO/TO) *4/10/25*	The OSHA standard for The Control of Hazardous Energy (Lockout/Tagout), 29 CFR 1910.147, addresses the practices and procedures necessary to disable machinery or equipment, thereby preventing the release of hazardous energy while employees perform servicing and maintenance activities. Employers are to develop, implement, and enforce an energy control program, and inspect the energy control procedures at least annually. The standard gives the employer flexibility to develop an energy control program suited to the needs of the particular workplace and the types of machines and equipment being maintained and serviced. If you are new to Lockout/Tagout this program will give you the basics you need to know. For those who are more familiar with the standard, this program will serve as a valuable review.
OSHA Reporting and Recording Requirements *5/7/25*	The purpose of this workshop is to introduce the requirements and procedures related to OSHA Injury & Illness Recordkeeping, including the electronic reporting of injuries and illnesses requirements. The class will help develop skills to accurately report occupational injuries and illnesses. Resources and reference materials will be provided. If you are responsible for completing the documents required by this rule (OSHA 300, OSHA 300A and OSHA 301), or if you supervise the person that completes the forms, or if you are a safety committee member, this class is a must.
New England Roundtable *Every Wednesday of the Month*	Bringing business together to network and share ideas in the occupational safety and health community. The roundtable meetings are held from 9:00 am to 10:15 am every Wednesday. For more information on the New England Roundtable visit: oshaedne.com/roundtables

Visit this link for more info and to sign up.

Farewell Catherine Zinsser

Catherine Zinsser has retired from state service after spending 20 years with CONN-OSHA. Catherine started her two decades of work with the agency as a Connecticut Careers Trainee with responsibility for the occupational clinics program and the CONN-OSHA Quarterly newsletter. She then took on the challenges of working as CONN-OSHA's public sector Occupational Safety Training Specialist. While working in these two capacities Catherine was proud that her outreach and training initiatives made a difference. She found that it was rewarding to provide employers with common sense information on how to develop safety programs that would prevent work-related injuries or deaths. Hundreds of Connecticut employers have benefited from her quarterly in-person and virtual OSHA Recordkeeping classes.

Catherine received her BS in Industrial Hygiene from Quinnipiac University. Before joining CONN-OSHA she worked for Liberty Mutual in their loss control department and for GZA GeoEnvironmental as a safety coordinator.

Catherine plans to enjoy life by spending time with family and friends. Catherine was a valued member of our training team. We wish her well.

Welcome Aneesa Dawson

Aneesa Dawson has joined CONN-OSHA's Administrative team. Aneesa spent most of her childhood in Barbados before moving to the United States at age 15. She graduated from Berkeley College in New York with a bachelor's degree in business management and a minor in administration. Aneesa has over 12 years of customer service experience through her work in the aerospace and distribution sectors.

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- **(860) 263-6946**

Private Employers:

- **Report to Federal OSHA**
- **(800) 321-OSHA (6742)**

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