Guidance on Protecting Employees During Hurricane Harvey and Especially In Cleanup.

Insights
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Despite the constant news coverage, Americans are inevitably surprised by the violence of hurricanes … and even more by the damages inflicted by storm surges and the extraordinary amounts of rain once the hurricane high winds pass. As I type this post, forecasters are predicting as much as 50" of rain in places. I cannot visualize that much rain but I can imagine the consequences of the average town or city receiving even 20".

People will be injured and killed because they underestimate the hazards posed by flooding and by clean-up. Even today, people are performing what OSHA refers to as *"Non-Routine Tasks."* Many will get hurt, and when they are employees, that exposure is on the employer.

Employees will fall through skylights or off of roofs dealing with roof damage and fallen trees and debris. Employees unaccustomed to chain saws will learn how unforgiving a whirling chain can be. Individuals will be electrocuted because of damage, but all too commonly they will be injured because they are unaccustomed to this work or do not have proper tools and PPE. Some employees will suffer skin rashes and infections from working in filthy water. Some will get snake bitten … generally when the water has receded and they encounter a scared and thoroughly irritated snake behind boxes and debris.

Injuries will not be limited to employees performing Non Routine tasks. Skilled recovery employees and other contractors will suffer heat exhaustion or get injured working at heights or near overhead lines.

How do we avoid these hazards?

Step 1: THINK before you act.
If the work involves Non Routine tasks … pause, conduct a Job Safety Analysis (JSA), determine the hazards, and provide training and PPE.

Step 2: Emphasize "Situational Awareness."
Make sure supervisors and employees look for unforeseen, hidden and just plain weird hazards.

Step 3: Take advantage of OSHA resources.
Although if power is out, as it is for about 325,000 at the moment, you won't be accessing the

Internet, but OSHA, FEMA, the City of Houston and other organizations have sound guidance (See end of POST). If you are caught flat footed on this occasion, sadly, you'll have more opportunities in the future to be well prepared. This is why we harp a great deal on "real" disaster/crisis preparation and business continuity planning and training.

Step 4: Anticipate that disasters never follow the rules and plans.

Every military veteran knows that no battle plan survives contact with the enemy … or as grunts prosaically put it … *"things happens."*

Expect problems. Be paranoid. Be glass half empty … and you will not be surprised. In your planning, ALWAYS engage in *"What-if"* analysis. I recommend that larger companies create a "What-if Committee" and periodically brainstorm (consider it an expanded process hazard analysis applied to every aspect of your business).

Step 5: Stay alert for hazards posed by fatigue.
The first thing to go, as you exhaust yourself, is your judgment. And glucose is essential. Skipping meals equals bad judgment, which results in injuries.

Step 6: Hydrate.
We're talking the Gulf, Texas, Louisiana and parts in between.

Step 7: Repeat after me … watch out for power lines.

Step 8: Fall Protection is non-negotiable.
Watch the TV. People are scrambling on to roofs to avoid being trapped by rising water. Most of these folks do not know what fall protection means. However, the employer MUST ensure that no corners are cut. Only one error is necessary, and as in the case of trenching, excavation and confined space entry, one error often means a death.

Step 9: Follow the Bloodborne Pathogens standard and recognize that rising waters will contain a soup of fecal matter, fuel, rotten food, chemical and heavy metals and other risks.
Provide PPE. Remember necessary vaccinations. Vigilantly attend to open wounds. Anticipate rashes and infections. Excellent OSHA Fact Sheet.

Step 10: Protect employees from Mosquitos.
Many of the affected areas were already dealing with West Nile Virus, ZIKA and other mosquito borne diseases. OSHA Fact Sheet – West Nile. OSHA ZIKA Quick Sheet.

Step 11: Generators and gas tools generate carbon monoxide – be careful about indoor usage.
Step 12: Follow Public Safety guidance. Texas is doing a fine job so far with state and federal advice. (Yes, I'm proud of my law school class mate, Texas Governor Greg Abbott).

Texas department of Public Safety – Hurricane Preparedness.

FEMA – Hurricane Harvey.

BELOW ARE SOME OF OSHA's RESOURCES:

The Preparedness page outlines the warnings and watches used for hurricanes, including the five categories used to rate the strength of a hurricane. The page also contains information on creating evacuation plans and supply kits.

The Response/Recovery page features a link to OSHA's Hurricane eMatrix, which features information on hazard exposures and risk assessments for hurricane response and recovery work. The information in the matrix is organized based on the types of activities performed so that it is easy for workers to identify the precautions they should take based on the tasks they will be performing.

OSHA and NOAA are working together on a public education effort aimed at improving the way people prepare for and respond to severe weather. This page is designed to help businesses and their workers prepare for hurricanes, and to provide information about hazards that workers may face during and after a hurricane.

Employer Responsibilities

Each employer is responsible for the safety and health of its workers and for providing a safe and healthful workplace for its workers. Employers are required to protect workers from the anticipated hazards associated with the response and recovery operations that workers are likely to conduct. For additional information on Workers' Rights, Employer Responsibilities, and other services OSHA offers, visit OSHA's Employers Page, Workers Page and Publications.

Flood Preparedness and Response

Floods can be serious catastrophes and they are one of the most common hazards in the United States. Floods can be caused by a variety of factors, including a sudden accumulation of rain, rising rivers, tidal surges, ice jams and dam failures.

OSHA and NOAA are working together on a public education effort aimed at improving the way people prepare for and respond to severe weather. This page is designed to help businesses and their workers prepare for floods, and to provide information about hazards that workers may face during and after a flood event.

Workers who have to respond to flooded areas face the greatest risks from floods, but all workers can help protect themselves by preparing evacuation plans and learning about the hazards commonly associated with floods.

The Preparedness page provides information on making an evacuation plan, emergency supply kits, and flood watches and warnings. This planning information can help you ensure that you are ready

to evacuate in an orderly manner before rising waters impact your business or residence, or your evacuation routes.

The Response/Recovery page provides useful details on the hazards to avoid when flooding has occurred. This includes areas to avoid when using a vehicle, and safety and health hazards such as downed electrical lines, mold and wild animals.

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