

	Manual:	Policy Section #:	34
	Safety Policy & Procedures	Page:	1 of 4
	Subject:	Revision:	1/20/18
	OSHA Recordkeeping	Issue Date:	1/1/03

1.0 Policy

All OSHA recordkeeping processes shall be maintained and utilized for the purpose of preventing recurrence.

2.0 Purpose

To ensure such regulatory requirements are maintained and utilized for analysis purposes.

3.0 Scope

Topics in this section apply to all incidents occurring, in the course of and / or arising from, work activities conducted by Sunbelt Controls employees or other employees, under the direction of Sunbelt Controls supervision.

4.1 Definitions

First Aid – includes the following types of treatment:

- Using non-prescription medications at non-prescription strength
- Administering tetanus immunization(s)
- Cleaning, flushing, or soaking wounds on the skin surface
- Using wound coverings, such as bandages, ‘Band-Aids’, gauze pads, etc., or using ‘Steri-Strips’ or butterfly bandages
- Using hot or cold therapy
- Using any totally non-rigid means of support, such as elastic bandages, wraps, etc.
- Using temporary immobilization devices while transporting an employee, such as splints, slings, neck collars, or back boards
- Drilling a fingernail or toenail to relieve pressure, or draining fluids from blisters
- Using eye patches
- Using simple irrigation or a cotton swab to remove foreign bodies not embedded in or adhered to the eye
- Using irrigation, tweezers, cotton swab or other simple means to remove splinters or foreign material from areas OTHER than the eye
- Using finger guards
- Using massages
- Drinking fluids to relieve heat stress

Illness – classified as a skin disease/disorder, respiratory condition, poisoning, or other illnesses resulting from an event in the work environment. Examples include, but are not limited to:

- Contact Dermatitis
- Eczema
- Silicosis
- Asbestosis
- Toxic inhalation
- Poisonings by lead, mercury, or other metals
- Poisonings by carbon monoxide, hydrogen sulfide, or other gases
- Poisonings by organic solvents or by other chemicals
- Heatstroke, sunstroke, heat exhaustion, or other heat-related factors
- Freezing, frostbite, or other cold-related factors
- Effects of Non-ionizing radiation (welder’s flash or lasers)

	Manual:	Policy Section #:	34
	Safety Policy & Procedures	Page:	2 of 4
	Subject:	Revision:	1/20/18
	OSHA Recordkeeping	Issue Date:	1/1/03

- Bloodborne Pathogenic diseases

Injury – any wound or damage to the body resulting from an event in the work environment.

Examples include:

- Cut/laceration
- Puncture
- Abrasion
- Contusion/bruise
- Fracture
- Chipped tooth
- Amputation
- Insect bite
- Electrocuting
- Thermal, chemical, electrical or radiation burn
- And, sprain/strain injuries to muscles, joints and connective tissues when the result from a slip, trip, fall or other similar accident

Medical Treatment – the management and caring for a patient for the purpose of combating disease or disorder. The following activities are NOT medical treatment:

- First Aid
- Visits to a doctor solely for observation or counseling
- Diagnostic procedures, including the administering prescription medications that are used solely for diagnostic procedures

OSHA Form 300 (*Log of Work-Related Injuries and Illnesses*) – a form that is used to classify work-related injuries and illnesses and to note the extent and severity of each case.

OSHA Form 300A (*Summary of Work-Related Injuries and Illnesses*) – a form that shows the totals for the prior calendar year in each category from the OSHA Form 300.

OSHA Form 301 (*OSHA's Injury and Illness Incident Report*) – the first form that must be filled out when a recordable work-related injury or illness has been determined, unless the State First Report of Injury contains all of the same information.

Restricted Work – activities where a doctor keeps, or recommends keeping, an employee from doing the routine functions of their job or from working the full workday that the employee would have been normally scheduled, before the injury/illness.

Work-Related Injury or Illness – an injury or illness resulting from an event or exposure in the work environment causing or contributing to the condition or significantly aggravating a preexisting condition

Work Environment – includes all work sites where one or more employees are present as a condition of their employment.

	Manual:	Policy Section #:	34
	Safety Policy & Procedures	Page:	3 of 4
	Subject:	Revision:	1/20/18
	OSHA Recordkeeping	Issue Date:	1/1/03

5.1 Requirements

5.2 Records Retention

Obtain OSHA Forms 300, 301 and 300A for use, as noted within this policy manual section. Visual reference copies of all three are found in Appendix 34-A.

A central log (Form 300) shall be maintained at the main office.

This log shall contain all OSHA Recordable injuries and illness for all activities. This central log shall be maintained and retained for, a minimum, of five (5) calendar years following the year to which they pertain.

Additional logs (Form 300) shall be maintained at all remote work sites that are expected to be in operation for one year or longer. This log shall only contain the OSHA Recordable injuries and illnesses for activities reporting to this remote work site. This remote log shall be maintained and retained for the duration of the work activity, or for, a minimum, of five (5) calendar years following the year to which they pertain. When this remote work site ends, the applicable logs (Form 300) shall be forwarded to and retained by the main office.

All First Reports of Injury (as provided by applicable State jurisdictions) shall be retained by the main office. These Reports shall constitute compliance with the retention of OSHA's Form 301.

When minor injuries are paid internally (reference Incidents section (33) of this manual) and a Workers' Compensation First Report of Injury is not received from the State, the Form 301 shall be prepared and retained by the main office for five (5) calendar years following the year to which they pertain.

5.3 Determining OSHA Recordability

Work-related injuries or illnesses shall be recorded when they fall within the following categories:

- Death
- Loss of Consciousness
- Scheduled work days away from work
- Restricted work activity or transfer for scheduled work days
- Medical treatment beyond first aid


If the injury or illness is OSHA Recordable, entry on the applicable Form 300 and completion of the Form 301 (if applicable) shall occur within seven (7) business days.

Some OSHA Recordable(s) may require reporting to OSHA (reference the Incidents section (33) of this manual).

5.4 Postings

Annually, a Summary of Work-Related Injuries and Illnesses (Form 300A) for the prior calendar year shall be compiled and posted, even if there is zero applicable OSHA Recordable(s) Incidents.

This posting at the main office shall include all OSHA Recordable(s) Incidents for activities reporting to the main office.

	Manual:	Policy Section #:	34
	Safety Policy & Procedures	Page:	4 of 4
	Subject:	Revision:	1/20/18
	OSHA Recordkeeping	Issue Date:	1/1/03

Remote work sites shall also post this Summary (Form 300A) for the prior calendar year, but only for OSHA Recordable(s) from activities reporting to that remote work site.

This posting shall remain in place from February 1 through and including April 30, beginning with the posting applicable to 2002 (February 1 through April 30, 2003). After this time, it shall be removed.

5.5 Federal or State Interpretations

All future Federal and State-approved OSHA interpretations applicable to issues within this manual section applying to the operations reporting to a business unit shall supersede the requirements noted within.

6.0 References

OSHA 29 CFR 1904

OSHA CPL 02-00-135